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Subject: Draft Environmental Impact Report (DEIR) for the Sacramento Entertainment and Sports Center & Related Development Project (SCH # 2013042031)

Dear Mr. Johnson:

Thank you for the opportunity to comment on the DEIR on the proposed Entertainment and Sports Center (ESC) & Related Development project.

Sacramento Area Bicycle Advocates is dedicated to helping transform the region by making it convenient and comfortable for more people to choose bicycling as a means of everyday travel. Participating as a stakeholder in projects like the Entertainment & Sports Center is one of the most important ways we fulfill our mission.

We believe that, properly done, the Proposed Project could make an important and substantial contribution to Sacramento's quality of life and vibrancy as a 21<sup>st</sup> century city. Sacramento has the opportunity to make the ESC one of the country's most bike-friendly facilities. All the elements for success are here: a large base of enthusiastic bicyclists in downtown, large events that already draw large numbers of cyclists downtown, the motivating necessity to maximize the bicycle modal split in order to reduce auto traffic at ESC events, and relatively mild weather that encourages cycling. We provide our comments in the spirit of making sure that vision is brought to reality.

This letter focusses on the following main areas of inadequacies in the DEIR.

**Project objectives and general plan policy:** The DEIR is defective because it fails to acknowledge that the Proposed Project is not consistent with important General Plan policies.

**Failure to adequately provide for access by bicycle:** The Proposed Project fails to adequately provide for access by bicycle and therefore would cause significant adverse impacts. These adverse impacts on bicycle access would result from: 1) inadequate bicycle parking, 2) inadequate access to bicycle parking, and 3) inadequate bicycle access to and from the ESC site.

**Inadequacy of the Event Transportation Management Plan:** Mitigation Measures 4.10-1, 4.10-6, 4.10-8, 4.10-11, 4.10-17, and 4.10-19 all require the project applicant to prepare and implement an Event Transportation Management Plan (ETMP). These mitigation measures are flawed, however, and do not comply with CEQA. The ETMP itself is flawed and does not include infrastructure improvements that may be required to fully address impacts of ESC events on transit operations, and pedestrian and bicycle access.

Below is a more detailed explanation of these inadequacies and our recommendations for resolving them. This content is summarized in Attachments 1 and 2.

### **Project objectives and general plan policy**

We wholeheartedly support the City's objectives for the Proposed Project as adopted by City Council on October 29, 2013. Particularly crucial for bicycle transportation are these City objectives for the ESC:

- *Sustainable Project*: "encourages public transit as well as pedestrian and bicycle transportation"
- *Connect Downtown*: "connects with and enhances downtown from the waterfront to the Convention Center and from the Capitol to the Railyards and intermodal facilities"
- *Multimodal Place*: is "an entertainment and sports center that complements a variety of transportation modes including . . . bicycling".

Many policies in the City of Sacramento's 2030 General Plan require that the Proposed Project ensure excellent access for bicycling. DEIR pages 4.10-36 and -37 cite policies from the General Plan's Mobility Element including "M5.1.4. The Proposed Project shall not result in conflicts between bicyclists and motor vehicles on streets, and bicyclists and pedestrians on multi-use trails and sidewalks." However, neither DEIR Table 3-1 nor Chapter 4.10 on transportation impacts and mitigation measures discusses how the Proposed Project is consistent with Mobility Policy M5.1.4.

The Sacramento General Plan also states key urban form characteristics to be achieved by development within the Central Business District (Land Use and Urban Design section) including #12 that specifies that street design shall integrate "pedestrian, bicycle, transit, and vehicular use" and shall incorporate "traffic-calming features . . .". Also, as discussed in DEIR Table 3-1, General Plan Policy LU2.6.1 Sustainable Development Patterns states that the City shall promote development patterns that "facilitate walking, bicycling, and transit use." General Plan Policy LU5.6.2 Family-Friendly Downtown states that the City shall promote the Central Business District as "a family-friendly area . . .". The DEIR must explain how the ESC's provision of walking and bicycling facilities will qualify as family friendly.

The DEIR is defective because it fails to acknowledge that the Proposed Project is not consistent with the General Plan policies stated above. For example, page 2-3 of the DEIR states the project applicant's objectives for the Proposed Project. Unfortunately, the 8th and 9th objectives among the applicant's objectives are not consistent with the City's objectives for the project and are not consistent with General Plan policies. To be consistent, the 8th objective should be amended to read "Ensure that *adequate vehicle and bicycle* parking for ESC patrons and employees is available *and accessible* for use during events (underline and italicizes added for emphasis)." Similarly, the 9th objective should be amended to read "Ensure that *adequate vehicle and bicycle* parking is available and sufficient *and accessible* to support patrons and employees of the mixed use development and other adjacent uses."

### **Failure to adequately provide for access by bicycle**

The DEIR findings of less than significant impacts on bicycle access are not supported by substantial evidence (Transportation Impacts 4.10-7 and 4.10-18, DEIR page 4.10-101 and -111). A more detailed explanation of these inadequacies and our recommendations for resolving the inadequacies is provided below and in Attachments 1 and 2.

## **1. Inadequate Bicycle Parking**

The Proposed Project fails to adequately provide for access by bicycle as it does not include sufficient quantity of bicycle parking or specificity of a bicycle parking plan. The DEIR acknowledges that the Proposed Project must comply with the City's bicycle parking requirements (Planning and Development Code Chapter 17.608 and Table 17.608.030C) as stated on DEIR page 2-54.

The project description, however, presents only a very conceptual Bicycle (parking) Plan for ESC operations depicted in Figure 2-24 (DEIR page 2-55): Long-term bike parking for employees would be provided in the underground parking garage; some undefined amount of short-term bike parking would be provided along the north edge of the ESC plaza whereas short-term bike parking for events with sufficient demand would be provided in temporary bike-valet operations. The project description fails to describe how decisions will be made to provide bike-valet operations and how and where they will be implemented.

Using the City's bicycle-parking requirements in Planning and Development Code Chapter 17.608, we have calculated required amounts of long- and short-term bicycle parking for the mixed uses proposed for the ESC SPD/PUD based on sizes of the uses stated in DEIR Table 2-2 and for ESC events based on employment (DEIR page 2-17) and event scenarios (DEIR Appendix L ETMP page 8). Attachment 1 shows the calculated bicycle parking requirements for each proposed use. The DEIR should include this information about required bicycle parking spaces in the Project Description section on bicycles at DEIR page 2-54. For example, the ESC must provide one long-term bicycle-parking space per 13 employees and short-term bicycle-parking spaces for 5% of attendees at events. Using this formula, a sold-out NBA game with 17,500 attendees and 1,200 employees would require 875 short-term spaces and 92 long-term spaces.

The DEIR does not describe how the required amounts of bicycle parking will be provided for ESC operations, either for employees or for event attendees. The bicycle parking plan must describe how it will provide long-term parking consisting of at least 20 spaces for permanent employees plus 92 spaces for temporary employees that staff events. The DEIR currently only mentions providing "approximately 20 long-term" spaces for employees in the underground parking (page 2-54).

The DEIR estimates a mode share of 0.5% for bicycling by attendees to typical NBA events, meaning only about 90 attendees will arrive on bicycles for NBA games (ETMP page 27). This low estimate may be appropriate for the initial season or two of NBA events at the ESC and for games in wintertime inclement conditions. However, Sacramento is a very favorable area for bicycling and bicycling to NBA events at the ESC will be much more attractive in spring and fall months when evening bicycling in Sacramento can be quite pleasant. Bicycling to other ESC events will also be more frequent for daytime events (e.g., matinee events attractive to families). The summer Concert in the Park series at Cesar Chavez Park, for example, regularly draws several hundred bicyclists to bike-valet parking for an attendance of several thousand persons.

The DEIR fails to account for the likely growth of bicycling mode share over the timeframe of the cumulative impact analysis to 2035. Currently, although bicycle access to downtown Sacramento can be difficult because of an incomplete network of low-traffic-stress bikeways, bicycles are an increasingly popular mode of transportation for commuters and for simply moving around downtown and midtown. As Sacramento's bikeway network becomes more comfortable and continuous, the bicycling mode share to downtown Sacramento will quickly grow. Tables 3-2 and 3-3 in the ETMP show that approximately 40% of NBA event attendees will come from or go home to neighborhoods within a 20- to 30-minute bicycle ride of the ESC (about 3-5 miles); these neighborhoods include Downtown Sacramento, Midtown, East Sacramento, Land Park, Curtis Park, Oak Park, North Sacramento, West

Sacramento, and South Natomas. So, as Sacramento's bikeway network improves, the bicycling mode share to the ESC can also be expected to steadily grow. The DEIR must relate likely bicycling mode share to the projections for 2035 in the Sacramento Area Council of Governments (SACOG) Metropolitan Transportation Plan.

The project description for the Proposed Project therefore must specify short-term parking for ESC events that is readily scalable (i.e., able to adaptively grow in capacity with more favorable bicycling conditions) and adequately secure. Security must not only protect against theft of entire bicycles but against theft or vandalism of important bicycle equipment such as wheels, seats, seats and speedometers. Bicycle racks that are not guarded or otherwise protected during events will not suffice for attendee bicycle parking.

For the required bicycle parking in future SPD/PUD uses, we recommend that the Proposed Project adopt a strategy of bicycle-parking facilities that are integrated into the mixed-use structures. For example, several high-volume parking facilities like the Folsom Pedal Stop, which has a capacity of 60 bicycles, located at two or more points around the SPD/PUD buildings could fulfill much of the long-term bicycle parking requirement for employees, tenants and residents, and also make short-term bicycle parking convenient for customers and visitors.

In conclusion, the DEIR must present a bicycle-parking plan that fully complies with City requirements for bicycle-parking capacity and that is specific about how short-term bicycle parking will be provided for ESC events. Short-term event parking must be provided sufficiently near the ESC that it not be a deterrent to bicycling use (e.g., in the ESC plaza or immediately adjacent). Such parking must be fully secured to protect bicycles and their auxiliary equipment, and must be scalable for handling the expected amounts of bicycle use for the different kinds and conditions of ESC events.

## **2. Inadequate access to bicycle parking**

The Proposed Project fails to provide access to the bicycle parking depicted in Figure 2-24 of the DEIR. This figure shows that some amount of short-term bicycle parking for small events would be located along the north side of the ESC entry plaza near future SPD/PUD developments for a hotel and retail/commercial uses. The retail/commercial uses would largely be "oriented to have front doors mainly onto the entry plaza and the K St. alignment" (DEIR page 2-40). Short-term parking for customers of the retail/commercial uses should be in this location as required by the City's bicycle-parking ordinance: "Required short-term bicycle parking facilities shall be located in an area visible from and within 200 ft of the primary entrance of the building served" (Section 17.608.040 N.2.a). Figure 2-24 of the DEIR also shows that long-term bicycle parking for employees would be provided within the parking garage at this location.

The DEIR fails to describe access routes for bicycles to these locations for short-term and long-term bicycle parking. So that people traveling by bike can actually use this parking, the Proposed Project must establish routes for bicycles to access these parking locations from each of the access points shown on ETMP Figure 10 Bicycle Access Routes and Facilities. Key bicycle routes to the ESC under current conditions will approach from K St. to the east, 5th St. from the south, the K St. pedestrian/bicycle connection from the west and Old Sacramento, and J St. and the Intermodal Station to the north. Figure 6 of the PUD Guidelines (page 6-25) shows an access and open space easement providing pedestrian, bicycle, and vehicular access along the K St. alignment between 4th St. and the ESC plaza across 5th St.

To mitigate this significant impact, the Proposed Project must delineate bicycle access paths across the ESC entry plaza from these access points to the bicycle parking that are separate from pedestrian areas, using

pavement surface treatments and wayfinding signage. The access paths for bicycles to the short-term parking can also serve to direct bicycle travel across the entry plaza during non-event periods (e.g., for customers of the retail/commercial uses at the north side of the entry plaza).

Table 3-1 (DEIR page 3-13) states that “the public ownership of K St. would be vacated through the ESC project site . . . “. The DEIR must fully explain this statement, reveal the existing status of public ownership of K St., and disclose whether this action would significantly and adversely impact bicycle access to and through the project site in the transportation impact analysis.

### **3. Inadequate bicycle access to and from the ESC site**

The DEIR fails to disclose that the Proposed Project would adversely affect bicycle access to and from the ESC site from within the surrounding Central Business District. DEIR Figure 4.10-4 shows the existing bicycle network in the vicinity of the ESC site, including striped bicycle lanes along 5th St., J St., I St., and Capitol Mall. K St. has a combination of Class 1 bicycle path and Class 3 bicycle route approaching the ESC site from the east. As stated in the ETMP (page 26), “the recent addition of striping to provide on-street bicycle lanes on Capitol Mall, 5th St., and J St. make[s] them ideal routes for bicyclists to access the ESC.”

The DEIR must disclose that event vehicle-traffic operations will adversely affect most of these facilities, as shown by Figure 2-22 (entrances/exits to/from VIP parking and loading/delivery/service bays, zones of auto drop-off) and Figure 2-25 (temporary street closures and traffic control stations to manage vehicle and pedestrian flows for NBA games). Likewise, ETMP Figures 13 and 14 (Pre- and Post-Event Vehicle Routes) show which street segments and intersections will be heavily affected by vehicle traffic to and from parking facilities for NBA games. Figure 4.10-15 (Pre-Event Peak Hour Pedestrian Flows) and Table 4.10-24 (Pedestrian Volumes – Existing plus Project Conditions) show that numerous intersections will be subject to spillover of pedestrians from cross-walks because of excessive pedestrian flow rates before typical NBA events. Those adverse effects must be mitigated.

The DEIR fails to disclose that the concentrated vehicle and pedestrian flows for NBA-type events will cause conflicts between vehicles and bicyclists and between pedestrians and bicyclists, as prohibited by General Plan Mobility Policy 5.1.4. For example, closure of 7th St. between J and L streets would appear to adversely affect bicycle access to the Class 1 bicycle path on K St. These significant impacts on bicycling in the vicinity of the ESC will also occur although to a lesser extent for smaller events. ETMP Table 2-1 estimates 50 NBA events and large concerts (28%), 53 events of 5,000-10,000 attendees (30%), and 74 events of 5,000 attendees or less (42%) each year. These conflicts will adversely affect both bicyclists attending events and those simply passing by between other parts of the SPD/PUD, Old Sacramento, and the Central Business District.

To avoid these conflicts and thus mitigate the significant impacts, the Proposed Project must result in improvements to bicycling infrastructure to and from the ESC site. Bicycling infrastructure improvements will be needed on 5th St. for access from north (e.g., Sacramento Valley Station) and south (e.g., Capitol Mall), on J St. for access from the east, and on L St. for access from the east. These improvements should consist of dedicated bikeways separated from pedestrian paths (e.g., to and from key transit stations), vehicle access routes (e.g., into and out of ESC underground parking), and truck access routes to the ESC. Because vehicular traffic into and out of large ESC events, especially NBA games, will be very high volume and high speed, these bikeways must offer low-traffic-stress conditions as described by Mekuria et al.<sup>1</sup>. Appropriate protected bikeways would be two-way cycle

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<sup>1</sup> Mekuria, Maaza, Peter Furth, and Hilary Nixon. 2012. Low-Stress Bicycling and Network Connectivity. Mineta Transportation Institute, San Jose State University. May. Report 11-19.

tracks (<http://streetswiki.wikispaces.com/Two-Way+Cycle+Tracks>) installed on the north side of J St. (opposite ESC parking entrance/exits and drop-off zones), the south side of L St. (opposite ESC parking entrance/exits and drop-off zones), and the west side of 5th St. (opposite the ESC truck exit ramp and the double northbound right turn lanes at J St.). These sides of these blocks have few driveways, thus minimizing turning conflicts with cars, and making these blocks optimal for cycle-track installations. A two-way bikeway along the 5th St. alignment could also be placed across the entry-plaza bridge over 5th St.

The Proposed Project should partner with the City of Sacramento's Department of Public Works to make these bicycle infrastructure improvements and thereby mitigate the significant impacts to bicycle access to and from the ESC site.

### **Inadequacy of the Event Transportation Management Plan (ETMP)**

The DEIR has proposed Mitigation Measure 4.10-1 to mitigate the significant worsening of intersection conditions in the vicinity of ESC (DEIR page 4.10-93). This measure would require the preparation and implementation of the ETMP, subject to the review and approval of the Sacramento Traffic Engineer in consultation with affected agencies such as Caltrans and Regional Transit.

The ETMP would "manage vehicular circulation near the project site" and "optimize the safe and efficient use of multiple modes of transportation to and from events at the ESC" (DEIR page 4.10-92). The DEIR also proposes the ETMP as mitigation for Transportation Impacts 4.10-6 (access to light rail) and 4.10-8 (pedestrian access) and for mitigation of impacts to intersections, light rail, and pedestrian facilities under cumulative conditions projected for 2035.

Mitigation Measures 4.10-1, 4.10-6, and 4.10-8 do not comply with CEQA guidelines and fail to mitigate the significant impacts in 2 ways:

1. The ETMP has not been finalized and approved by the City so that it cannot be determined that the project would adequately reduce the significant impacts, as stated on DEIR page 4.10-93.
2. CEQA Guidelines Section 15126.4(a) requires that "mitigation measures must be fully enforceable through permit conditions, agreements, or other legally-binding instruments." Mitigation Measures 4.10-1, 4.10-6, and 4.10-8 do not identify the minimum required contents of the ETMP. To be enforceable, the ETMP must have performance standards for what it will achieve, how its efficacy will be measured during ESC operations, how success of the ETMP will be demonstrated, and what corrective actions will be taken and by when if its efficacy is inadequate.

The ETMP must be reworked by the Project Applicant and the City to include enforceable performance standards about what it will achieve. The ETMP should encompass not only traffic-operations measures but also infrastructure improvements that may be required to fully address impacts of ESC events on transit operations, and pedestrian and bicycle access. More than half of ESC events are expected to have more than 5,000 attendees (ETMP Table 2-1). Therefore, the ETMP should also include measures for these events in addition to "sold-out NBA games" with 17,500 attendees. Such smaller events also can be expected to adversely affect travel operations in the ESC vicinity.

Because the ETMP would be intended not only "to manage vehicular circulation near the project site" but also "to optimize the safe and efficient use of multiple modes of transportation to and from events at the ESC" (DEIR page 4.10-92), its final approval should rest with the City of Sacramento Director of Public Works whose responsibilities

encompass all types of transportation services. Finalizing the ETMP must include Caltrans and Regional Transit and also other entities responsible for managing Sacramento transportation (e.g., Sacramento Transportation Management Association) and representatives of non-auto travel modes (e.g., WALKSacramento and Sacramento Area Bicycle Advocates).

The Bicycle Element of the ETMP should be greatly expanded to serve as mitigation for significant impacts to bicycle access as follows:

Adequate bicycle parking for ESC Events: This section should establish a performance standard to provide all long- and short-term bicycle parking required by Sacramento Planning & Development Code including a bicycle valet parking program that is readily scalable for 5% of expected event attendees, is adequately secure from bicycle theft and vandalism, is located in or immediately adjacent to the ESC, and that has clearly described implementation responsibilities.

Adequate access to bicycle parking: This section should detail how routes across the ESC plaza will be provided to direct bicyclists to parking locations at the ESC, whether short- or long-term. These routes must be provided for bicyclists arriving at the ESC from north (Sacramento Valley Station and Natomas), south (Land Park), east (Midtown, East Sacramento, Curtis Park), or west (Old Sacramento, Sacramento River Parkway Bicycle Path, West Sacramento). These routes must be delineated with pavement treatments and wayfinding signage.

Adequate access to and from the ESC site: This section should have a performance standard that specifies that the Proposed Project will join in partnership with the City of Sacramento Department of Public Works to install low-traffic-stress bikeways connecting the ESC site in all 4 cardinal directions. These bikeways would serve the several blocks in each direction affected by vehicular and pedestrian conflicts before, during, and after ESC events. This section must also address bicycle travel through the streets proposed for temporary closure after ESC events. These bikeways would have the auxiliary benefit of allowing bicyclists of all ages and abilities to ride to the ESC plaza and the SPD/PUD during non-event periods.

One of the objectives of the ETMP is “to facilitate and maximize bicycle use by ESC event attendees and employees” (ETMP page 1). The ETMP’s plan for monitoring and refinement aims to “ensure that a high proportion of project employees and visitors . . . are traveling to and from the site via transit, bicycle, and walk modes” (ETMP page 49). Therefore, the monitoring part of the ETMP must be enhanced to fully encompass all modes of transportation to the ESC, such as its effectiveness in accommodating pedestrians and bicyclists.

The ETMP must describe how the monitoring results will be documented in annual reports, available for public review, and how the results will be used to modify ETMP operations and infrastructure in the ESC vicinity. Modifications and improvements to the ETMP should be done in consultation with the same entities and representatives of all travel modes as help finalize the ETMP in its initial year and subject to approval by the City of Sacramento Director of Public Works. Monitoring and refinement of the ETMP should continue through the life of the ESC in response to improvements in multi-modal transportation opportunities and further build-out of the Central Business District (e.g., the ESC SPD/PUD).

The mitigation measure adopted by City Council in the EIR will guide preparation of the ETMP and must specify necessary details regarding ETMP content, success criteria, responsibilities for approval and implementation, and

enforceability.

### Other Comments

We have attached additional detailed comments on the DEIR as Attachment 2. The comments in Attachment 2 are to be considered in addition to the comments provided in this letter.

DEIR Section 2.4.10 discusses the proposed ESC SPD/PUD. We hereby incorporate by reference as additional comments on the DEIR all comments provided in our letter to Stacia Cosgrove of the Community Development Department, City of Sacramento, dated December 31, 2013. The letter provided detailed comments on the draft SPD/PUD and should be carefully compared against the contents of Section 2.4.10 of the DEIR. Included in that letter are comments on the following: the change to Planning Director approval for certain uses in lieu of the Planning and Design Commission; the inappropriate limiting of allowable residential uses to one-and two-bedroom units (which is not consistent with General Plan Policy LU5.6.2 Family-Friendly Downtown); comments on specific PUD Design Guidelines including the proposed reduction in minimum sidewalk width; and comments that suggest additional modifications to the Central City Urban Design Guidelines relevant to the PUD area. The December 31 letter to Ms. Cosgrove is included as Attachment 3.

We also fully support the comments provided by the Capitol Corridor Joint Powers Authority, as submitted by email on Jan. 22, 2014, by James Allison, Manager of Planning. We hereby incorporate this email, by reference, as additional comments on the DEIR, as Attachment 4.

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: Paul Philley, SMAQMD (pphilley@airquality.org)  
Ed Cox, City of Sacramento Alternative Modes Coordinator (ecox@cityofsacramento.org)

Attachments: 1. Bicycle-Parking Requirements for Proposed ESC and ESC SPD/PUD  
2. Additional DEIR Comments  
3. SABA letter to Stacia Cosgrove, Community Development Department, City of Sacramento, dated December 31, 2013



**Attachment 1  
Bicycle Parking Requirements for Proposed ESC PUD/SPD  
Based on uses described in Table 2-2 in ESC DEIR page 2-11**

Use	Proposed size	Long-Term Bicycle Parking		Short-Term Bicycle Parking	
		City requirement	Spaces	City requirements	Spaces
retail/commercial (sq. ft)	350,000	1 space per 10,000 ft <sup>2</sup>	35	1 space per 2,000 ft <sup>2</sup>	175
office (sq. ft)	475,000	1.5 spaces 10,000 ft <sup>2</sup>	71.3	1 space per 20,000 ft <sup>2</sup>	23.8
hotel (rooms)	250	1 space per 30 rooms	8.3	1 space per 60 rooms	4.2
residential (units)	550	0.5 space per unit	275	0.1 space per unit	55
<b>TOTAL</b>			<b>390</b>		<b>258</b>



**Attachment 2  
Additional DEIR Comments**

The comments on the DEIR provided below are to be considered in addition to the comments provided in SABA's letter to Scott Johnson at the City of Sacramento, dated Jan. 23, 2014. and Attachments 1 and 3 to that letter.

**Chapter 2, Project Description**

All details of the Proposed Project must be fully disclosed in Chapter 2, Project Description, and fully analyzed in subsequent chapters. Currently, some details of the project can only be found in chapters other than Chapter 2. Examples of these missing and hidden details are included in comments below.

Short-term bike racks are proposed for the north side of the ESC, yet most riders are (correctly) anticipated to arrive from the south. The project description fails to explain how riders are to be accommodated without requiring them to walk their bikes through the facility or take the long way around to the north side. The project description does not consistently address bicyclists' needs and how they will be accommodated in a manner that is compatible with pedestrian accommodations. For example, the discussion of street closures (page 2-56) focus on pedestrians, but do not describe what will be done for bicyclists.

Further, the project description fails to mention the bicycle barricade proposed on 7th St., where exactly it would be located and how and when it would be operated. These details must be added to the project description and Event Transportation Management Plan (ETMP) and fully analyzed in subsequent chapters. The barricade is currently only mentioned on page 3-13 in Table 3-1.

The project description mentions use of post-game street closures for the peak event, including 7th St. between J and L Streets, and L St. between 8th and 5th Streets (page 2-56). Is a post-event bicycle barricade proposed on L St.?

The Project Description chapter must describe how bicycles are to be accommodated on the streets proposed for closure. Prohibiting bicycle access along the closed streets is unacceptable because it would force cyclists into the auto stream and away from their most logical and convenient routes (i.e., 5th, 6th, 7th, and L Streets) to and from the venue.

The project description fails to provide the details of proposed sidewalk widths in the project area. Page 2-45 identifies a proposed reduction in the minimum sidewalk width currently specified in the existing Central City Urban Design Guidelines. This reduction is proposed at the project boundaries on 5th St., the south side of J St. and the west side of 7th St. As documented in the January 16, 2014 Report to Planning and Design Commission, City staff recommendation is to maintain the minimum sidewalk width specified in the Central City Urban Design Guidelines and remove the proposed sidewalk reduction from the PUD. The language must be removed from the DEIR.

There is no description of other proposed sidewalk widths in the project description chapter. Instead, widths are disclosed in Table 3-1 on page 3-13. The details of all proposed sidewalk widths must be included in Chapter 2, Project Description.

In Table 3-1 on page 3-14 is the following statement: The Proposed Project would maintain and enhance City sidewalks along J St., 7th St., and L St. On page 3-13 a similar sentence is used but the word enhance is omitted. Are sidewalk enhancements being proposed? Where in the EIR is there a description of the enhancements? If

enhancements are being proposed, they should be described in Chapter 2, Project Description.

The project description includes providing permanent changeable message signs on freeways that could be used to facilitate pedestrian, bicycle, and vehicle access (page 2-56). However, since freeways are used for vehicular traffic, justification is needed for how adding message signs on freeways would facilitate pedestrian and bicycle access.

The project description describes the use of the northern lane of L St. between 6th and 7th streets for media truck parking (page 2-50). This contradicts earlier public statements regarding the “activation” of L St. and City Councilmember requests to prevent the L St. side of the ESC from being an unattractive back door to the site. How will the placement of media trucks along the southern wall of the ESC enhance and activate L St. between 5th and 6th streets?

### **Chapter 3, Land Use, Population and Housing**

#### **Land Use Consistency and Compatibility**

The discussion in Chapter 3 is inadequate in that it fails to identify the inconsistencies of the Proposed Project with General Plan policies. For example, the DEIR does not provide a discussion of how the project is consistent with Mobility Policy M 5.1.4. This analysis is absent from Chapter 3 as well as Chapter 4, section 4.10, Transportation.

In Table 3-1, the discussion of Policy LU 5.6.2 states that the PUD would allow for development of high-density residential uses but fails to mention that the project is anticipating smaller-sized one-and two-bedroom units, as described in the Project Description on page 2-41. This fact must be disclosed in the discussion of this policy and an explanation provided for the project’s lack of family-friendly housing called for in Policy LU 5.6.2.

The proposed reduction in the minimum sidewalk width is inconsistent with General Plan Policy LU 4.4.4. The reduction in the minimum sidewalk width would not allow for an “ample public realm” and broad sidewalks furnished with pedestrian amenities that provide comfortable and attractive settings to accommodate high levels of pedestrian activity. Further, as stated on pages 3-9 and 3-10, the General Plan establishes that development in the Central Business District must be designed to reflect an urban form that is characterized by elements including broad sidewalks appointed with appropriate pedestrian amenities, including sidewalk restaurant/café seating. Reducing minimum sidewalk widths is inconsistent with the General Plan. As documented in the January 16, 2014 Report to Planning and Design Commission, City staff recommendation is to maintain the sidewalk with specified in the Central City Urban Design Guidelines and remove the proposed sidewalk reduction from the PUD. The language must be removed from the DEIR as well.

### **Chapter 4, Environmental Impacts, Setting, and Mitigation Measures**

#### **4.1, Aesthetics, Light and Glare**

Reasonably Foreseeable Development. The Aesthetics, Light and Glare discussion completely fails to address the visual impacts of reasonably foreseeable development of the now-vacant city parcels that will be deeded to the Kings as part of this deal. This includes two parcels adjoining Crocker Art Museum and the adjoining park. Reasonably foreseeable development would potentially affect the museum, the park, and the high-density residential community to the east of the park. Reasonably foreseeable development can be based on existing general plan and zoning land use allocations.

The analysis of the digital billboards, which are by definition and location intended to be seen by drivers and passengers on the city's major highways, does not employ any discernible standard visual impact analysis methodology. The analysis should at least use the Federal Highway Administration's (FHWA's) "Visual Impact Assessment for Highway Projects" Publication No. FHWA-HI-88-054. That's the standard methodology for projects adjoining freeways.

The FHWA methodology identifies drivers and passengers as a viewer group. The DEIR analysis ignores the impact of the digital billboards on this group.

A related concern is the presentation of state law regulating message boards. The discussion on page 4.1-30 is confused and may not accurately portray the "relocation" provisions of state code. If it is correct, then the proposed amendment to city ordinance that would eliminate the ordinance's relocation provisions (page 4.1-40) would seem to be contrary to state law. Those discussions need to be harmonized.

Photosimulations. The analysis lacks even the most simple photosimulations of what the proposed digital billboards would look like from the view point of the highway, nearby trails (Hwy 50/Pioneer Reservoir and Bus 80/Sutters Landing, in particular adjoin biking and/or walking trails), offices, and residential areas. This is particularly important for the US 50 at Pioneer Reservoir site where the billboard is described as being 45 feet higher than the Pioneer Bridge. The actual height is not provided, but it is probably in the neighborhood of 115 feet. Without photosimulations, neither the analyst nor the reader of the DEIR can possibly understand what the visual impact might be. The digital billboard at the US 50 at Pioneer Reservoir site may have a base that is broad enough to intrude into the visual quality of the adjoining bike trail. At the proposed height, it may be visible from West Sacramento and would certainly block existing rather pleasing views of the downtown from the Pioneer Bridge. Similarly, the impact of the Business 80 at Sutter's Landing Regional Park billboard on trail users' visual quality along the American River corridor, as well as on views from Business 80 cannot be determined. As written, the analysis of the digital billboards lacks the substantial evidence necessary to support its impact conclusions and fails to fully disclose the breadth and character of the significant effects that it purports to disclose.

Nighttime Visual Impacts. The analyses do not consistently address nighttime visual impacts. The impacts of the US 50 at Pioneer Reservoir and Business 80 at Sutter's Landing Regional Park sites will be particularly vibrant at night. The former may dominate the existing view of downtown from US 50 as well as views of the City from West Sacramento; the latter will intrude upon the rural character of the American River recreational corridor. While all of the digital billboards will arguably have significant visual impacts during the day, those impacts will be magnified at night. This is easily seen at the auto dealership digital billboard in Fairfield, the Cal State message board on US 50, and the State Fair digital billboard on Business 80.

State Scenic Highways. The analysis casually dismisses the impact on state scenic highways suggested by Appendix G of the State CEQA Guidelines because none of the highways affected by the proposed digital billboards are designated scenic highways (see page 4.1-42). However, Appendix G by its own terms is not intended to be the only criterion by which to determine whether there is an impact. Depending upon the project and its circumstances, there may be impacts that are not listed in Appendix G that are nonetheless pertinent to an analysis of that project. Here, all of the highways in question are "landscaped freeways" (see page 4.1-30) that are provided some level of protection by the Outdoor Advertising Act from sign intrusion. "Substantially damage views along landscaped highways" should be substituted for the scenic highway criterion found in Appendix G and the project's impact evaluated on that basis.

Mitigation. Mitigation Measures 4.1-1(a) and 4.1-1(b) are inadequate (beginning on page 4.1-68). They improperly defer mitigation by delaying the development of mitigation until after the signs are designed. The visibility studies

required by these measures lack performance standards, a means of measuring effectiveness, and even a commitment to mitigate the impacts that might be found during this delayed study.

Digital billboards are the most intrusive of all highway signs. Placing six new boards on Sacramento highways will greatly change the way in which visitors and residents visually perceive of the city. This will not be a positive change and the EIR must disclose that fact.

#### **4.6, Hazards and Hazardous Materials**

The following significance criteria is included in the DEIR for the analysis of hazards and hazardous materials: The project would result in a significant impact if it would interfere with an adopted emergency response plan or emergency evacuation plan. However, there is no analysis in the DEIR of the project's potential effects on emergency response or evacuation. Considering the high volumes of vehicle and pedestrian traffic anticipated (resulting in up to LOS F for both), the high seating capacity of the arena and the capacity of the other planned land uses, this omission is a significant error in the DEIR. This impact must be analyzed for the Existing Plus Project condition as well as the 2035 cumulative condition for which the project's contribution to a cumulative impact must be clearly shown.

In the introduction to Cumulative Impacts for Hazards and Hazardous Materials, page 4.6-25, the DEIR states that "the Proposed Project would contribute to potential cumulative exposure associated with interference with remediation of the South Plume, accidental or inadvertent release of hazardous substances during transportation, and interference with adopted emergency response or evacuation plans. Each of these cumulative impacts is further discussed." As stated previously, the impact discussion for interference with adopted emergency response or evacuation plans is missing from the DEIR. Because an EIR must discuss cumulative impacts of a project when the project's incremental effect is cumulatively considerable, this statement implies that the project would result in a cumulatively considerable impact; however it fails to disclose it.

#### **4.10, Transportation**

DEIR pages 4.10-36 and -37 cite policies from the General Plan's Mobility Element including "M5.1.4. The Proposed Project shall not result in conflicts between bicyclists and motor vehicles on streets, and bicyclists and pedestrians on multi-use trails and sidewalks." However, neither the analysis in section 4.10 nor Table 3-1 (relevant goals and policies) discusses how the Proposed Project is consistent with Mobility Policy M5.1.4. The DEIR is lacking an analysis of how the Proposed Project would prevent conflicts between bicyclists and motor vehicles and bicyclists and pedestrians. This discussion must be added to the DEIR.

Under Analysis Methods, in the discussion under *Existing Plus Project Trip Generation (Auto, Transit, Walk, Bike)*, tables are provided to show the AM Peak Hour, PM Peak Hour and Pre-Event Peak hour volumes for vehicles, transit ridership and pedestrians. Absent is the equivalent presentation of bicycle volumes. As identified in Table 4.10-7, bicycles are assumed to represent 2% of the travel modes for the for non-ESC land uses. A complete, equivalent discussion of bicycle use as a travel mode must be included in the DEIR. Similar to the travel routes and access points described for motor vehicles, transit riders and pedestrians, the DEIR must provide a description of the travel routes (not just designated bikeways) and access points for bicycles. The current lack of information prevents an adequate understanding of the analysis of the project's effects on bicycle use.

The analysis of *existing plus project* bicycle operations must be added to the DEIR. The discussion of *Existing Plus Project Traffic Operations* lacks an adequate discussion and analysis of the bicycle mode. A table equivalent to Table 4.10-24 should be added. An analysis of how the routes used by bicycles would be affected by vehicular traffic and pedestrian flows and how proposed road closures would affect bicycle use should also be added to the

DEIR. The lack of analysis prevents an adequate understanding of the project's effects on bicycle use.

Under Analysis Methods, the discussion of *Cumulative Conditions* (starting on page 4.10-77), fails to describe the bicycle travel conditions and bicycle systems anticipated in 2035. There is no mention of reasonably foreseeable bicycle system improvements nor anticipated increases in the bicycle mode volumes. The DEIR must relate likely bicycling mode share to the projections for 2035 in the Sacramento Area Council of Governments (SACOG) Metropolitan Transportation Plan. The absence of data regarding the 2035 bicycle system and 2035 bicycle operations leads to the inadequate discussion of the project's contribution to cumulative effects (discussed further below).

#### **Impact 4.10-1**

To conform to the General Plan, Policy M 1.2.2(a) calls for transportation infrastructure improvements to be implemented so that a project would not be required to provide mitigation for vehicular traffic impacts to road segments. Those improvements are required within the project site vicinity or within the area affected by the project's vehicular traffic impacts. These improvements can consist of increases in system-wide roadway capacity, intersection improvements, or enhancements of non-auto travel modes.

Impact 4.10-1 claims that the Proposed Project will "accommodate bicycle travel through bike share/valet programs and designated bike parking areas" as part of multi-modal improvements. The DEIR must acknowledge that these bicycling improvements are actually part of the No Project Alternative because 1) bike-share stations in the project vicinity are already identified in Sacramento's Bike Share Business Plan<sup>1</sup> and 2) Sacramento's Planning and Development Code already requires specified amounts of long- and short-term bicycle parking for new developments. Therefore, these improvements are existing and reasonably foreseeable conditions instead of elements of the Proposed Project that would enhance non-auto travel modes.

To mitigate for the worsening of intersection conditions in compliance with Policy M 1.2.2, the impact discussion should include infrastructure improvements proposed by the project to improve other parts of the citywide transportation system in the vicinity of the project site, to make intersection improvements, or enhance non-auto travel modes in ways that are not already mandated by City Code or included as part of other projects.

Impact 4.10-1 discloses that, even with the two "generalized travel benefits and specific multi-modal improvements" described, the street system in the vicinity of the project could experience substantial congestion unless circulation is managed effectively. The impact discussion also discloses the lack of finality and approval of the draft ETMP and the inability to determine if it would adequately "improve other parts of the citywide transportation system in the vicinity of the project site." As stated in the draft ETMP executive summary, the ETMP is a management and operating plan, not an infrastructure or capital improvement plan. Further, no infrastructure improvements other than wayfinding signs are proposed by the draft ETMP (the same signs already identified in the Project Description on page 2-56). It is "with the provision of such other transportation infrastructure improvements [that] the project would not be required to provide any mitigation for vehicular traffic impacts to road segments in order to conform to the General Plan" (Policy M 1.2.2). Therefore, use of the ETMP to improve vehicular traffic is not consistent with Policy M 1.2.2. The DEIR must be modified so that the ETMP is not identified as a way for the project to comply with Policy M 1.2.2.

The findings in Impact 4.10-11 are not supported by substantial evidence. Impact 4.10-1 identifies the worsening of conditions at intersections in the City as a significant impact and offers as mitigation the implementation of the

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<sup>1</sup><http://airquality.org/bikeshare/MediaAdvisory20131014.shtml>

ETMP. However, in the words of the DEIR, “because the ETMP has not yet been finalized and approved by the City, it cannot yet be determined that the project would adequately improve other parts of the citywide transportation system in the vicinity of the project site.” Immediately following this statement, the DEIR incorrectly claims that implementation of Mitigation Measure 4.10-1 would reduce Impact 4.10-1 to less-than-significant levels; there is no evidence to support this conclusion. Since it cannot yet be determined that the transportation system improvements needed to reduce the level of this impact would occur through implementation of the ETMP, this impact must be identified as **significant and unavoidable**. This unavoidable impact must be disclosed in the DEIR.

#### **Impact 4.10-6**

While elements of the ETMP that relate to Impact 4.10-6 are included in Mitigation Measure 4.10-6, mitigation for access to light rail transit also requires implementation of the ETMP itself. Therefore, Mitigation Measure 4.10-1 is also required to reduce the significant impact identified.

#### **Impact 4.10-7**

The DEIR findings of less than significant impacts on bicycle access are not supported by substantial evidence. For additional information regarding the lack of evidence, refer to the *Failure to Adequately Provide for Access by Bicycle* section of SABA’s letter to Scott Johnson at the City of Sacramento, dated Jan. 23, 2014.

Impact 4.10-7 also fails to disclose the potentially significant impacts to bicycle circulation caused by the proposed bicycle barricade (see DEIR page 3-13). The barricade could cause an impact to existing bicycle facilities as well as impacts on access to and from the site by bicycle. K St. between 7th and 8th is identified as a Class I bicycle facility on Figure 4.10-4. How will the barricade affect access to, and use of, this existing bicycle facility? This, and impacts to other existing and proposed bicycle facilities, must be disclosed in the DEIR. Also, how will the closure of L St. between 5th and 8th streets affect the Class II bicycle facility on 5th St.? Modify the discussion in Impact 4.10-7 to include analysis of these potentially significant impacts.

The Proposed Project’s inadequate access to bicycle parking, inadequate access to and from the ESC site and the effects of event vehicle traffic operations on existing bicycle facilities are considered **significant** impacts and should be identified as such in the DEIR. In addition, the DEIR must identify specific feasible mitigation to attempt to reduce the impacts to a less-than-significant levels. Recommendations for mitigation are included in SABA’s letter to Scott Johnson at the City of Sacramento, dated Jan. 23, 2014.

#### **Impact 4.10-9**

The DEIR findings of less than significant impacts on emergency access are not supported by substantial evidence. This impact fails to disclose and properly analyze the potentially significant impacts on emergency access caused by LOS F motor vehicle conditions on adjacent roadways, the thousands of pedestrians using sidewalks and crosswalks during pre-event and post-event peak hours causing pedestrian flows of LOS E or F, post-event road closures, and longer light rail transit trains that would block more roadway. It also omits discussion of how road closures would be operated to maintain emergency access and how bicycle access and use would be maintained and allowed. The complete lack of analysis, disclosure of potentially significant impacts and identification of suitable mitigation must be corrected. The DEIR must be corrected to indicate that this impact is considered **significant**. In addition, the DEIR must identify specific feasible mitigation to attempt to reduce the impacts to a less-than-significant levels.

#### **Impact 4.10-11**

The impact must clearly identify the project's specific contribution to cumulatively considerable impacts then identify mitigation to reduce that contribution. This impact is worked too similarly to Impact 4.10-1 and does not identify the cumulative analysis that was conducted, nor the project's cumulative contribution to the unacceptable intersection operations. This is a major flaw in the analysis that must be corrected.

Refer to and follow CEQA Guidelines section 15130 when preparing the cumulative analysis for this and other impacts, including but not limited to the direction provided in the following subsection.

15130(a)(3) An EIR may determine that a project's contribution to a significant cumulative impact will be rendered less than cumulatively considerable and thus is not significant. A project's contribution is less than cumulatively considerable if the project is required to implement or fund its fair share of a mitigation measure or measures designed to alleviate the cumulative impact. The lead agency shall identify facts and analysis supporting its conclusion that the contribution will be rendered less than cumulatively considerable.

The findings in Impact 4.10-11 are not supported by substantial evidence. Refer to the comments above under Impact 4.10-1 and apply them to the Impact 4.10-11 discussion, as well. Since it is unknown whether implementation of the ETMP would reduce this impact to less-than-significant levels, the project's contribution to cumulative unacceptable intersection operations is not adequately mitigated by Mitigation Measure 4.10-1. Therefore this impact must be identified as **significant and unavoidable** after mitigation. This unavoidable impact must be properly disclosed in the DEIR.

#### **Impacts 4.10-12 through 4.10-21**

Impacts 4.10-12 through 4.10-21 are inadequate in that they completely lack a cumulative analysis and in several cases use the exact text that was presented for the Existing Plus Project impact discussion. This omission in analysis must be corrected. The cumulative analysis must be presented in the cumulative impact discussions and the project's contribution to significant cumulative impacts clearly identified for each impact type.

Also, though they appear to be within the Cumulative Impacts section, the headers for Impacts 4.10-18, -19, -20, and -21 fail to identify that they are for cumulative conditions.

Impact 4.10-18. The DEIR findings of less than significant cumulative impacts on the bicycle system are not supported by substantial evidence. Lacking in the DEIR is an actual presentation and analysis of the cumulative conditions for bicycle facilities and access by bicycle, and an analysis of the project's contribution to those conditions. This impact discussion must be rewritten to include the analysis and a clear reasoning for the impact findings. For additional information regarding the lack of evidence, refer to the *Failure to Adequately Provide for Access by Bicycle* section of SABA's letter to Scott Johnson at the City of Sacramento, dated Jan. 23, 2014.

#### **Mitigation Measure 4.10-1**

An EIR must describe feasible measures which could minimize significant adverse impacts. Mitigation must be identified to reduce each significant impact, even if the impact cannot be reduced to less-than-significant levels by the identified mitigation.

For intersection operation impacts, the DEIR relies on the use of Mitigation Measure 4.10-1, implementation of an Event Transportation Management Plan, and states that it reduces the significance of Impacts 4.10-1 and 4.10-11 to less-than-significant levels. Mitigation Measure 4.10-1 is flawed for two reasons. The first reason is clearly disclosed in the DEIR on page 4.10-93: "because the ETMP has not yet been finalized and approved by the City, it

cannot yet be determined that the project would adequately “improve other parts of the citywide transportation system in the vicinity of the project site.” Therefore, the mitigation measure does not adequately reduce vehicular traffic impacts to less-than-significant levels.

Second, CEQA Guidelines section 15126.4(a) requires that “mitigation measures must be fully enforceable through permit conditions, agreements, or other legally-binding instruments. In the case of the adoption of a plan, policy, regulation, or other public project, mitigation measures can be incorporated into the plan, policy, regulation, or project design.” Measures also “may specify performance standards which would mitigate the significant effect of the project and which may be accomplished in more than one specified way.” Mitigation Measure 4.10-1 calls for the preparation and implementation of a ETMP, but does not identify the minimum required contents of the ETMP or any performance standards for how the implementation of the ETMP will be enforced, how its efficacy will be measured during operation of the ESC, how success of the ETMP will be identified and demonstrated, and what corrective actions must be taken, and by when, if its efficacy is shown to be inadequate. This level of detail is required for mitigation to be properly implemented and monitored by the Mitigation Monitoring and Reporting Plan.

The Project Description chapter references an active monitoring process that would occur during the first year of project operation, however, this level of detail is not provided in the mitigation measure language that will be adopted and implemented. One year also does not provide enough time to monitor the effects of buildout of the PUD area in addition to the ESC site.

The draft ETMP included with the DEIR is just that, a draft, and its contents cannot be guaranteed until it is finalized and adopted. Because the mitigation measure adopted by the City as part of the Mitigation Monitoring and Reporting Plan will guide the preparation of the final ETMP, this measure must include the necessary details for content, performance criteria and enforceability.

#### **Mitigation Measure 4.10-6**

Mitigation Measure 4.10-6 identifies a 7th St. closure between J St. and L St. However, there is no mention of the proposed bicycle barricade identified in Table 3-1 on page 3-13. Mitigation Measure 4.10-6 must identify how the 7th St. closure to vehicular traffic would affect bicycle-rider’s access to the Class I bicycle facility on K St. The effect of this measure on the existing bicycle system is potentially significant. The DEIR must discuss the significant impacts of proposed mitigation, as required by CEQA Guidelines section 15126.4(a)(1)(D).

CEQA Guidelines 15126.4(a)(1)(D): If a mitigation measure would cause one or more significant effects in addition to those that would be caused by the project as proposed, the effects of the mitigation measure shall be discussed but in less detail than the significant effects of the project as proposed.

Mitigation Measure 4.10-6 also specifies that the five strategies listed shall be implemented to improve access to light rail transit. Lacking in the measure is mention of any performance standards regarding how implementation of these five strategies will be enforced, how their efficacy will be measured during operation of the ESC, how success of the strategies will be identified and demonstrated, and what corrective actions must be taken, and by when, if their efficacy is shown to be inadequate.

Mitigation Measure 4.10-6 goes on to state that the five strategies will be documented in the ETMP. The detailed requirements for the contents of the ETMP should be identified in Mitigation Measure 4.10-1.

### **Mitigation Measure 4.10-8**

Mitigation Measure 4.10-8 specifies that the enhancements listed will be consistent with the ETMP. Since the detailed requirements for the contents of the ETMP are not identified in the DEIR, it is unclear how these enhancements will be made consistent. Further, measure 4.10-8 does not state that the enhancements are required to be contained in the ETMP.

The detailed requirements for the contents of the ETMP should be identified in Mitigation Measure 4.10-1 and the enhancements identified in Measure 4.10-8 should be included in those content requirements. Separating out some of the details of the ETMP adds confusion to the understanding of the proposed mitigation.

### **Chapter 6, Project Alternatives**

The description of the Proposed Project includes possible provisions for a Bikeshare docking station. However, the discussion of the No Project Alternative fails to mention that bike-share stations in the project vicinity are already identified in Sacramento's Bike Share Business Plan<sup>2</sup> and should therefore be a reasonably foreseeable part of no-project conditions.

### **Appendix L: Draft Event Transportation Management Plan**

The ETMP must state specific objectives, such as minimizing disruption of existing bike facilities, making sufficient bike parking conveniently available to attendees, minimizing opportunistic parking in neighborhoods within walking distance of the ESC, etc., and then providing specific management activities that will achieve each of those objectives. At present, the ETMP sometimes reads like a report on what might be done, rather than a program describing what will be done.

The event scenarios are aimed at daytime events and basketball events and do not address the most common sorts of anticipated events: non-basketball, night events. Further, note that Section 8.4 states that "the controls described below are for sold-out NBA game" (sic)", defined as 17,500 fans, and may also apply to "large sold-out concert or community event." This implies that much of the ETMP would not apply (or be required) for games that are not sold out or for smaller concerts and community events. That really isn't acceptable, given the traffic impacts generated by any large event. The ETMP must be employed for all NBA games (even non-sell outs) and for major events that have scheduled performance times. Small events that are day-long are less a concern since arrivals and departures will occur over a longer period.

Pre-event controls at J and 3rd streets (page 39) state that Caltrans message boards will help direct drivers away from the J St offramp when traffic is backing up there. The next most convenient exit to the south is Q St. However, the ETMP fails both to account for higher traffic volumes on Q and 5th resulting from such diversions (and how those will be managed) and how disruption of the surrounding neighborhoods by opportunistic parkers arriving via Q St. will be avoided. If the plan is to use the parking lots along the R St. corridor for event parking, that must be disclosed in this plan. Further, there must be management of traffic at those parking lots, too.

Short-term bike racks are proposed for the north side of the ESC, yet most riders are (correctly) anticipated to arrive from the south. The ETMP fails to explain how riders are to be accommodated without requiring them to walk their bikes through the facility or take the long way around to the north side. The ETMP does not consistently address bicyclists' needs and how they will be accommodated in a manner that is compatible with pedestrian accommodations. For example, the objectives for street closures (section 8.4.3 on page 41) focus on pedestrians,

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<sup>2</sup> <http://airquality.org/bikeshare/MediaAdvisory20131014.shtml>

but do not describe what will be done for bicyclists.

Also, there is no discussion on who will be responsible for implementing the proposed bicycle valet parking.

The ETMP also must describe how bicycles are to be accommodated on the streets proposed for closure. Prohibiting bicycle access along the closed streets is unacceptable because it would force cyclists into the auto stream and away from their most logical and convenient routes (i.e., 5th, 6th, 7th, and L streets) to and from the venue.

The monitoring methods in Section 10.2 explain how monitoring will be done, but fail to establish what is to be done with the results of the monitoring. The ETMP must describe the objectives of monitoring and of the ETMP itself, and how monitoring results will be used to achieve the ETMP objectives by modifications to the ETMP. Missing from the list of monitoring activities is monitoring of the effectiveness of the program in accommodating cyclists and pedestrians. Also missing is monitoring of the use of distant light rail parking lots by attendees (at Freeport and Vallejo, at City College, etc.). If fans begin parking at those lots and riding light rail to games, there may be a need for traffic management at those lots, too.

Monitoring Documentation (page 50) must include City review and input in the drafting of the report. Further, it isn't acceptable to leave review and approval of the updated ETMP to the sole discretion of the City Traffic Engineer. The ETMP must include an outreach component to allow affected communities effective input into the ETMP updates.

Sacramento has the opportunity to make the ESC one of the country's most bike-friendly facilities. All the elements for success are here: a large base of enthusiastic bicyclists in downtown, large events that already draw large numbers of cyclists downtown, the motivating necessity to maximize the bicycle modal split in order to reduce auto traffic at ESC events, and relatively mild weather that encourages cycling. The Proposed Project and the ETMP need to live up to that promise by making attendance by bicycle convenient, safe, and compatible with pedestrian and auto traffic.



**SACRAMENTO AREA  
BICYCLE ADVOCATES**

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**Attachment 3**

**SABA letter to Stacia Cosgrove, Community Development Department, City of Sacramento, dated December 31, 2013**



**SACRAMENTO AREA  
BICYCLE ADVOCATES**

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December 31, 2013

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

SUBJECT: Entertainment and Sports Center Project: Planned Unit Development, and Special Planning District (P13-065)

Dear Ms. Cosgrove,

Thank you for this opportunity to provide comments on the Entertainment & Sports Center zoning documents being considered by the Sacramento Planning & Design Commission.

Sacramento Area Bicycle Advocates is dedicated to helping transform the region by making it convenient and comfortable for more people to choose bicycling as a means of everyday travel. Participating as a stakeholder in projects like the Entertainment & Sports Center is one of the most important ways we fulfill our mission.

In my December 12, 2013, letter to you, I noted that SABA would be submitting substantive comments on the draft zoning documents. Those additional comments are attached. Implementing the comments will ensure that the ESC-PUD area will be developed in a way that accomplishes the Project Goals adopted by City Council on October 29, 2013 and will create a high quality urban lifestyle that accommodates and encourages more and safer trips by bicycle. Below is an overview of our comments.

First, the draft zoning documents fail to include the site-specific land use and design requirements that will help the City realize the twelve Project Goals adopted by the City Council on October 29, 2013. For example, the *Sustainable Project* goal specifically refers to making the site accessible by all modes of transportation, yet the draft documents contain no requirements for accomplishing this goal. This must be corrected.

Second, land uses will be regulated under the SPD in Planning and Development Code section 17.442, however, in order to realize the City's vision for the site, the design of the ESC-PUD site must also be regulated by city code and not addressed only through unenforceable guidelines. The draft zoning documents fail to indicate how the PUD will be codified. We suggest giving the Design Guidelines their own Planning and Development Code section number to ensure that they are enforceable.

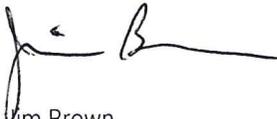
Finally, we've identified many errors in the maps that are included in the draft PUD. All such errors should be corrected so that the maps accurately depict the existing roadway network, direction of traffic flow, and motor

vehicle connectivity. A separate figure that accurately depicts the current bikeway network should be added to the document.

Similarly, the images in the PUD should reflect urban development types, consistent with the City's adopted Project Goals. We suggest that you to delete and replace images of the existing Downtown Plaza and images of suburban development, as they do not forward the design for the proposed project.

We expect to see the attached comments reflected in the zoning documents to be presented to the Planning & Design Commission for consideration on January 16, 2014. If you have any questions about the comments, please feel welcome to contact me directly at any time.

Respectfully,

A handwritten signature in black ink, appearing to read 'Jim Brown', with a long horizontal stroke extending to the right.

Jim Brown  
Executive Director  
916-444-6600  
jim@sacbike.org

Attachment

cc: Gregory Bitter, AICP, gbitter@cityofsacramento.org

John Rinehart  
Sacramento Basketball Holdings, LLC  
Sleep Train Arena  
One Arena Parkway  
Sacramento, CA 95834

Councilmember Steve Hansen, SHansen@cityofsacramento.org

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## **Entertainment and Sports Center**

### **Comments to draft Planned Unit Development and Special Planning District documents**

#### **General Comments**

These two zoning documents are the City of Sacramento's documents. Thus, they need to clearly reflect the City's vision for the ESC-PUD area, consistent with the adopted Project Goals. The documents need to specify the site-specific zoning regulations and design standards that will apply to this site. The draft documents dated November 20, 2013, fall short on both accounts.

The documents should include site-specific land use and design requirements to achieve the twelve Project Goals adopted by Sacramento City Council on October 29, 2013. For example, the *Sustainable Project* goal calls for developing an ESC project that encourages pedestrian and bicycle transportation. To ensure that this goal is accomplished, the project's zoning documents must include standards for safe and adequate bicycle parking for the variety of proposed uses, design requirements for bicycle access to the proposed land uses, and design requirements to create and maintain north-south and east-west connectivity to adjacent downtown areas.

Through the PUD, or preferably, in a single document -- the SPD -- the City should modify the *Central City Urban Design Guidelines* to reflect the adopted Project Goals and the site-specific project standards necessary to achieve those goals. Specifically, amend *Chapter 3-Public Realm Guidelines* and *Chapter 4-Private Realm Guidelines* to include specific design guidelines that allow for and encourage in modern and innovative ways the use of bicycles as a mode of transportation downtown and through the ESC-PUD area (see specific comments below). This amendment should include guidelines for bicycle parking for various uses, design requirements for access, etc. These should modify the generic standards included in the zoning ordinance and the General Plan so that they reflect the vision for this site.

Minimize cross references to other standards and guidelines, particularly when they are generic and will not guide the design of the site in the direction defined by the City's adopted Project Goals.

The document should be illustrated with examples taken from urban, not suburban designs. For example, the photo on page 6-3 in the PUD shows a suburban mall and should be replaced or deleted.

All errors in the map figures should be corrected so that the figures accurately reflect the existing roadway network, direction of traffic flow and motor vehicle connectivity currently present. A separate figure that accurately depicts the current bicycle network should be added to the document.

Page references included below are taken from the PDF versions of the documents date-stamped November 20, 2013.

#### **SPD Comments**

The ESC-SPD ordinance needs to be substantially revised to take advantage of the provisions of the SPD zone allowing it to change the list of allowable uses otherwise found in the C-3 base zone. This revision can be accomplished in the following ways:

##### **Section 17.442.040 – Uses**

Make the following revisions:

- Under subsection A, insert a table of allowable uses. The listed uses should exclude all C-3 uses that are not to be allowed in the ESC-SPD. Provide a note for retail stores that there will be no CUP requirement related to their size (this is item 1 on page 4-2 of the ordinance). Revise the table of uses allowable by CUP to delete the following uses that are clearly not consistent with the ESC-SPD (there's only so much room for development within the ESC-SPD site, it needs to be limited to a concise list of complementary uses): dwelling, single-unit; fraternity house; residential care facility; residential hotel; auto sales, storage, rental; kennel; major medical facility; non-residential care facility; school, K-12; tobacco retailer; veterinary clinic; and community garden.
- Delete subsection B and replace it with a statement indicating that those uses that are not listed in the table are not allowed in the ESC-SPD zone.
- Revise subsection C so that it relates directly to Section 17.422.040, rather than “adding” uses to a table found in a different section of the zoning code.

### Section 17.442.050 – Development and Design Standards

This section needs to be greatly expanded to include all of the building siting standards in the C-3 zone, as modified by the language found in the *Performance and Development Standards* section of the PUD. The modifications currently proposed in the PUD include changes to *Building Siting* and *Building Massing and Scale*. These modifications should be moved to Section 17.442.050.

Apparently, some standards are not proposed for change from the C-3 or other zoning ordinances (i.e., *Small Public Spaces; On-site Circulation, Loading Areas and Parking; Landscaping and Paving*). Where that is the case, a cross-reference to the applicable standard under the C-3 or other zoning code is justified, and the standards need not be repeated in Section 17.442.050.

The standards must provide project-specific development requirements to ensure that bicycle parking and pedestrian access are tailored to the ESC-PUD site and land uses. Section 17.442.050 should reflect best practices for wayfinding to lead pedestrians and bicyclists to and from nearby destinations and routes that connect to the ESC-PUD site. If implementing appropriate wayfinding requires modifying the provisions of code sections 17.600.135, 17.608, 17.612, and 17.620, then the modified provisions need to be described in Section 17.442.050.

The current approach to Section 17.442.050 is backwards – it should contain the performance and development standards and the PUD should cross reference to Section 17.442.050, not vice versa. As currently proposed, the PUD provides no code sections that amend the C-3 standards (in fact, the currently proposed PUD lacks even an overall code section to indicate where it is to be found in Title 17, the City's zoning code). This omission calls into question whether any amendments are actually being made. The bulk of the *Performance and Development Standards* section of the PUD needs to be moved into the SPD document to make explicit those site-specifically modified zoning requirements.

### PUD Comments

The PUD is unnecessarily wordy and should be trimmed to eliminate discussions that do not set out the specific design visions for the project. This is not a specific plan and should not be written like one.

Delete images of the existing Downtown Plaza and of suburban development. These do not forward the design for the proposed project. The PUD should reflect urban development types, consistent with the City's adopted Project Goals – suburban development images are out of place.

## Introduction

Page 6-13, Existing Conditions. Second paragraph notes the abandonment of 4th and 6th Streets surrounding the PUD. Specify the exact portions of these streets that have been abandoned and note on Figures 5 and 6.

Page 6-13, Existing Conditions, second paragraph. K Street is described as a pedestrian-only open space that connects the ESC-PUD site with K Street Mall to the east. This is confusing. K Street does not exist within the existing Downtown Plaza, as it has long since been abandoned. Specify the portions of what was once K Street that have been officially abandoned as City streets.

Page 6-13, Existing Conditions, second paragraph. Specify the portions of this K Street alignment that are pedestrian-only and the portions on which other uses, such as bicycles, are allowed (e.g., west of 4th Street for connection with Old Sacramento).

Page 6-14. Delete Figure 1. This has no relation to the design standards. As a PUD adopted by the City of Sacramento, it is obviously located in Sacramento and no figure is needed.

Pages 6-14 and 6-15. The brief discussion of the existing Downtown Plaza is enlightening and provides context. However, the accompanying photos of the existing shopping mall are superfluous and should be deleted. They bear no relationship to the ESC-PUD.

Page 6-16. Make the following corrections:

- Correct Figure 2 to indicate that light rail travels on H and 7th streets between the Sacramento Valley Station and K Street.
- Replace "Sacramento Amtrak" with "Sacramento Valley Station," the official name of the facility.

Page 6-17. Under Project Purpose and Objectives, insert a reference to the adopted Project Goals. Otherwise the impression is given that the five objectives currently listed will direct design.

Page 6-17. Under Administration, specifically state that the ESC-PUD standards and guidelines are zoning regulations and will be implemented and enforced as such. It needs to be clear that while uses are regulated under the SPD district, design will be regulated by the PUD. The ESC project is the most substantial, important, and influential project that has come to the City's downtown and may remain the most important for years to come. Because of this, the ESC-PUD should not be seen as simply a general guide to, or suggestions for, development design on the site. If the ESC is to reflect the City's vision and provide a complementary addition to downtown, then the site-specific design guidelines ultimately set out in the ESC-PUD must be part of City code.

Page 6-17. Under *Administration* make the following changes:

Uses and performance and development standards within the ESC-PUD site will be regulated by the requirements of 17.442, Entertainment and Sports Center Special Planning District, in the Planning and Development Code. Design guidelines in the ESC-PUD will be regulated by the requirements of 17.453, Entertainment and Sports Center Planned Unit Development.

## Plan Overview

Page 6-21. Eleven of the 12 Project Goals adopted by the Sacramento City Council apply directly to the ESC-PUD site. The contents of the PUD (and SPD, if combined) should be written to ensure that these goals are achieved. At the very least, after the first paragraph, add the following text:

## Project Goals

On October 29, 2013, the City Council reviewed and adopted the following list of ESC project goals to direct the design, construction, and operation of the ESC and surrounding public spaces, office, commercial, and residential development: [insert the full text of the 12 goals].

Page 6-21. Revise the first sentence under *Design Principles*:

In addition to the City Project Goals, the following design principles were considered to develop the schematic land use map, development standards and design guidelines for the ESC-PUD site:

Page 6-21. Revise the second paragraph under *Design Framework* to clarify that these design standards are specific to this site:

The zoning classifications for the site describe the allowable uses there. The design standards and guidelines define its design. The standards and guidelines are based on the *Central City Urban Design Guidelines* but are further refined for application to the ESC-PUD site.

Page 6-23. Figure 5. Revise the figure title to read "Motor Vehicle Circulation Framework," as this map includes routes where bicycling is not authorized, such as freeway entrance and exit ramps.

Make these additional revisions to Figure 5:

- Indicate that J Street does not connect between 3rd and 2nd streets. Delete the line segment under I-5 and the "to Old Sacramento" text.
- Indicate that 3<sup>rd</sup> Street is two-way between L and I Streets and one-way south of L Street.
- Indicate that 5th Street is one-way northbound south of L Street, between J and I streets, and between the entrance to the Sacramento Valley Station and H Street, and is two-way between L and J streets and between I Street and the entrance to the Sacramento Valley Station.
- Replace "Sacramento Amtrak" with "Sacramento Valley Station," the official name of the facility.
- Indicate that 7th Street is two-way north of H and one-way southbound south of H.
- Label the light rail lines in the figure's legend, show the full line along 7th Street (i.e., between K Street and the Sacramento Valley Station, via H Street), and add the station locations (which are only listed in the legend, but not shown on the figure).

Add a separate figure that accurately depicts the current bicycle network.

Page 6-24. Revise the first sentence under *Land Use Development* to read as follows:

Development of the properties within the ESC-PUD site must be designed so that it will integrate and connect with the neighboring ESC and surrounding urban fabric both visually and functionally.

Page 6-24, Uses. Move this text to the introduction of the Land Use Development section, after the first paragraph, to make it clear where the description of allowed uses is located, before describing the desired land use development program.

Page 6-24, Land Use Development, Residential. The PUD document should provide a high-quality urban lifestyle that includes a variety of high-density housing designs within walking and bicycling distance to employment centers and shopping. Limiting allowable residential uses to one- and two-bedroom sizes may unnecessarily limit the variety of potential residents in this neighborhood and is narrower than what is currently allowed in the C-3 zone.

On page 6-24, delete the fourth sentence under *Residential*. Change the fifth sentence as follows:

The total residential square footage would be approximately 500,000 square feet, including residential units, common areas, and mechanical and other support spaces.

Page 6-25. Figure 6, Schematic Land Use Map. Make the following corrections:

- The arrows misleadingly suggest direction of travel and should be removed. For example, J Street is one-way eastbound and 5th Street is one-way northbound south of L Street.
- Delete the dashed line under I-5 and line west of I-5 on J Street. J Street does not connect between 3rd and 2nd streets.
- At the K Street tunnel under 3rd Street and I-5, replace “pedestrian connection” with “pedestrian-bicycle connection.” Bicycling is allowed on K Street west of 4th Street.
- On K Street between 7th and 8th streets, add a dashed line and this text: “Existing pedestrian-bicycle connection”.
- Replace “Amtrak Station” with “Sacramento Valley Station,” the official name of the facility.

### Performance and Development Standards

There is a fundamental drafting problem with parts of the performance and development standards that are supposed to modify or replace provisions in the Planning and Development Code. The current approach to this section and Section 17.442.050 of the SPD is backwards. The SPD document should contain the performance and development standards and the PUD document should cross reference to Section 17.442.050, not vice versa. This section needs to be cleaned up to clearly specify the standards to be applied within the ESC-SPD and moved to that ordinance. The clean-up requires revising the proposed Section 17.442.050 so that it contains all of the zoning standards from the C-3 zone, as modified, that are to apply to this project. Include a cross reference to Section 17.442.050 in the PUD.

Figure 7 indicates a main building envelope along J Street that fails to clearly provide adequate, welcoming access to the plaza from J Street and areas to the north between 5th and 7th streets, despite a vague reference in Figure 6 to a mid-block entrance into the plaza along J Street. The development standards in the code should be amended to indicate that the main building envelope should be reduced and broken to provide for multiple entrances and viewpoints to the plaza.

Delete the photograph on page 6-31. It does not depict a downtown, high-density development and therefore does not apply to this PUD.

### Design Guidelines

The Design Guidelines should be given their own section number under Planning and Development Code Chapter 17. In the introductory language to this section, state that these guidelines are part of a new Chapter 17.453, Entertainment and Sports Center Planned Unit Development, in the Planning and Development Code. This will ensure that the guidelines are enforceable.

This chapter needs editing to delete superfluous references to the Central City Urban Design Guidelines.

This chapter should contain specific guidelines and/or headings within each of its sections DG1 (public realm) and DG2 (private realm) that describe the specific bicycle and pedestrian improvements expected of the project. The current draft fails to account for three of the 12 adopted Project Goals – *A Multimodal Place*, *Connect Downtown*, and *Sustainable Project* – and how the project relates to the rest of downtown and Old Sacramento in ways that achieve these goals.

The following are suggested revisions and additions to *DG1: Public Realm* and *DG2: Private Realm* to accomplish these three project goals:

## **DG1: Public Realm**

### **Streets and Intersections**

#### ***Corridor Streets***

Revise the first sentence after *Corridor Streets* to indicate that L Street serves as an arterial:

**Corridor Streets:** J, L and 5<sup>th</sup> streets are considered “corridor streets” that serve as arterials through downtown Sacramento that are intended to provide “efficient” circulation for motor vehicles and bicycles and connect freeways and regional highways.

Add these new guidelines under *Corridor Streets*:

DG1.X. To accommodate the widest variety of people who want to travel by bicycle to, from and past the ESC-PUD and ESC sites, J, L and 5<sup>th</sup> streets should feature bikeway facilities that offer adequate protection from adjacent motor vehicle traffic. Buffered bike lanes and/or and cycle tracks are optimal.

DG1.X. Access for bicycling between J and L streets across the 5<sup>th</sup> Street bridge should be provided as a safer alternate connection between the Sacramento Valley Station and neighborhoods immediately south of the ESC-PUD and ESC sites, without the potential for bike-vehicle conflicts in the 5<sup>th</sup> Street underpass, especially at the truck loading dock exit ramp and the two dedicated right-turn only lanes from 5th Street onto J Street. Paint and/or paving materials should be used to delineate separate paths for bicycling and walking to minimize the potential for bike-pedestrian conflicts.

Insert Figures A and B (see below) to illustrate the guidelines in this section.

#### ***One-way Transit Street***

Revise *One-way Transit Street* as follows:

**One-way Transit Street:** 7<sup>th</sup> Street along the eastern edge of the site is considered a one-way transit street. This street also carries southbound bicycle traffic to and past the ESC-PUD and ESC sites from neighborhoods to the north.

Add this new guideline under *One-way Transit Street*:

DG1.X. Light rail tracks on 7<sup>th</sup> Street should be fitted with rubber flange fillers to make tracks safe to cross for bicycles.

Insert Figures C and D (see below) to illustrate the guidelines in this section.

#### ***Neighborhood Retail Street***

Revise guideline DG1.2 as follows:

DG1.2. 4th Street right-of-way may be adjusted to increase the available site for the potential expansion of the cinema/theater, so long as it preserves access for bicycling and walking between J Street and the K Street

bike access to Old Sacramento. Paint and/or paving materials should be used to delineate separate paths for bicycling and walking to minimize the potential for bike-pedestrian conflicts.

Add this new guideline:

DG1.X. Access for bicycling on 4<sup>th</sup> Street should be provided on the sidewalk between L and K streets to improve connectivity through the ESC-PUD and ESC sites between the neighborhoods to the south and the K Street bike access to Old Sacramento. Paint and/or paving materials should be used to delineate separate paths for bicycling and walking to minimize the potential for bike-pedestrian conflicts.

Insert Figures E through H (see below) to illustrate the guidelines in this section.

### **Sidewalks and Building Interface Area**

Delete guideline DG1.5. The existing guidelines in *Chapter 3: Public Realm, Section 3.C.1, Sidewalks* should apply to the ESC-PUD, including the existing guideline *C.1.a.1, Sidewalk Widths*, which indicates that 16 feet is the typical sidewalk width, and should be 20 feet or more in high activity areas. Preserving the existing guidelines will ensure that a diversity of uses can be accommodated and create a comfortable experience for pedestrians that reduces congestion.

Add this new guideline:

DG1.X. Paint and/or paving materials should be used to delineate separate paths for bicycling and walking on the sidewalk along the 5<sup>th</sup> Street bridge between J and L streets to minimize the potential for bike-pedestrian conflicts. Crosswalks leading to and from the 5<sup>th</sup> Street bridge across L and J streets should also delineate separate paths for bicycling and walking.

Insert photos Figures E through H (see below) to illustrate the guidelines in this section.

### **Street Furnishings and Amenities**

Revise guideline DG1.8 as follows:

DG1.8. Bike racks on sidewalks and on-street bike racks ("bike corrals") for short-term bike parking, as required under current City ordinance, should may be integrated in the design of the amenity zone on all streets surrounding the site, especially within clear visibility and 50 feet of pedestrian-oriented daytime ground floor retail uses.

Insert Figures I and J (see below) to illustrate the guidelines in this section.

Add this new guideline:

DG1.X. The designs for bike racks and bike corrals should reflect current best practices for accessibility, efficiency and security. Optimal designs ensure two points of contact for the bicycle, do not require the user to lift the bicycle, and ensure the ability to use a U-lock.

### **DG2: Private Realm**

Replace the photo that illustrates guideline DG2.4 (page 6-39, upper left) with a photo that depicts downtown, high-density development. As a general rule, all photographs included in the PUD must illustrate an approach that is consistent with the guidelines.

Add this new section following *Building Facade Lighting*:

## **Bicycle Parking**

The bicycle parking guidelines provide design criteria to show owners and tenants of the ESC how to comply with the City's current bike parking ordinance, which contains requirements for short-term bike parking for customers, clients and visitors, and long-term bike parking for employees and residents.

### **Guidelines**

DG2.9. Short-term bike parking should be consolidated at two or more locations within the ESC that are conveniently accessible by bicycle from all adjacent streets.

- a. Locate bike parking near the edges of the ESC site, including on the 5<sup>th</sup> Street bridge near L Street and just inside the 7<sup>th</sup> Street plaza entrance, to minimize the potential for bike-pedestrian conflicts within the plaza. Wayfinding signage pointing to bike parking should be installed on all adjacent streets.
- b. Locate bike parking in one or more enclosed, covered spaces to maximize security and protection from the elements. Storefront locations and freestanding structures, such as kiosks and pavilions, are optimal.
- c. Facilities for consolidated short-term bike parking should be designed to accommodate long-term bike parking when feasible.
- d. The designs for freestanding bike racks should reflect current best practices for accessibility, efficiency and security. Optimal designs ensure two points of contact for the bicycle, do not require the user to lift the bicycle, and ensure the ability to use a U-lock.

DG2.10. Long-term bike parking should be located to be conveniently accessible from all adjacent streets, near the edges of the ESC site, when feasible.

- a. The designs for bike racks should reflect current best practices for accessibility, efficiency and security.
- b. When feasible, long-term bike parking should be consolidated with short-term bike parking in an enclosed, secured space such as a storefront or kiosk.

Insert Figures K through S (see below) to illustrate the guidelines in this section.

## Photo Inserts

The photos below should be incorporated into the PUD to illustrate key design guidelines.

### DG1: Public Realm

#### Corridor Streets

##### *Protected bikeways*

Figure A: Cycle track on N. Dearborn Street, Chicago



Figure B: Buffered bike lane on Spring Street in downtown Los Angeles



## One-way Transit Streets

### *Rubber-filled flangeways*

Figure C: Cherry Avenue Bridge, Chicago



Figure D: Detail of Cherry Avenue Bridge, Chicago





Figure G: Bike lane on sidewalk delineated with paving, Budapest, Hungary



Figure H: Pavement markings indicating bicycling and walking paths on the Brooklyn Bridge, New York City



## Street Furnishings and Amenities

### *Bike corrals and sidewalk bike racks*

Figure I: Bike corral in the Mission District in San Francisco



Figure J: Sidewalk bike rack at 11th and I streets, Sacramento



**DG2: Private Realm**  
**Bicycle Parking**

*High-volume short-term bike parking (freestanding structures)*

Figure K: McDonald's Cycle Center at Millenium Park, Chicago



Figure L: Interior of McDonald's Cycle Center at Millenium Park, Chicago



Figure M: BikeStation at Union Station, Washington, D.C.



Figure N: Interior, BikeStation at Union Station, Washington, D.C.



Figure O: Robotic self-serve bike parking kiosk, Germany



***High-volume short-term bike parking (storefront facilities)***

Figure P: Santa Monica Bike Center near 3rd Street Promenade, Santa Monica, CA



Figure Q: Interior, Santa Monica Bike Center, Santa Monica, CA



Figure R: Berkeley Bike Station at Berkeley BART station, Berkeley, CA



Figure S: Interior, Berkeley Bike Station at Berkeley BART station, Berkeley, CA





**SACRAMENTO AREA  
BICYCLE ADVOCATES**

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**Attachment 4**

**Email from James Allison, Manager of Planning, Capitol Corridor Joint Powers Authority, Jan. 22, 2014**

----- Forwarded message -----

From: **James R Allison** <[JimA@capitolcorridor.org](mailto:JimA@capitolcorridor.org)>

Date: Wed, Jan 22, 2014 at 12:04 PM

Subject: CCJPA Comments on ESC Project EIR

To: [srjohnson@cityofsacramento.org](mailto:srjohnson@cityofsacramento.org)

Cc: [dkutros@bart.gov](mailto:dkutros@bart.gov)

Mr. Johnson:

As you may be aware, the Capitol Corridor Joint Powers Authority (CCJPA) manages the Capitol Corridor Intercity Passenger Rail service. Sacramento is by far our busiest station and the seventh busiest in the nation. We understand the proposed Entertainment and Sports Center (ESC) complex has generated a strong degree of interest in the Sacramento community both for and against the project. The CCJPA supports the City of Sacramento's direction to hopefully utilize the ESC as a key element in revitalizing Sacramento's downtown. The draft EIR correctly identifies (in the transportation section) that Capitol Corridor service is available within a comfortable walking, bicycling, and transit distance but does not, at present, provide the ability of Capitol Corridor's latest trains to serve the usual ending time of basketball games and other entertainment events and conversely, would not usually be a means to access the events at the ESC in the first place. We agree with this characterization given today's schedule. We do, however, regularly participate with other sporting and event partnerships in the San Francisco Bay Area when those events and our service align. We do try to feature Capitol Corridor travel and promotions with the Oakland Raiders, Oakland A's, and Sacramento Rivercats since those game times can, at times, work well with Capitol Corridor service. But just as might be expected with the Sacramento Kings, we don't feature any marketing partnerships with the Golden State Warriors in Oakland or the San Jose Sharks in San Jose due to the end time differences with our existing service plan. That said, the Capitol Corridor service may still be utilized in certain circumstances as access to/from the proposed ESC for those who may stay overnight in the Sacramento area. But, as well, the ESC is expected to generate additional business activity, make the downtown area more attractive and for those reasons, probably increase the utilization of the Capitol Corridor service whether their is a game/event or not. In that context, the comments that CCJPA have are primarily about pedestrian and bicycle circulation, and transit accessibility to/from the Sacramento Valley Station. For the purposes of transit access, we defer to any comments made by a partner agency, the Sacramento Regional Transit District.

CCJPA's data reveals that pedestrian and bicycle modes are very high with mode of access between 10% and 20% for bicycling and up to about 30% for pedestrian. The percentages largely depend on direction of travel especially for pedestrian access because arriving at a destination in a location without access to a car means that modes leaving a destination station (e.g. Sacramento) are high for the pedestrian mode. Slightly different, are bicycles used at similar rates on both ends of the trips due to the fact that many people take their bicycles on the train with them. We expect that usage would remain in this range for these modes for access the ESC especially since any travel to the ESC or surrounding area would usually reflect not having access to a personal automobile while visiting Sacramento. For these reasons, the primary focus the CCJPA would like to support would be better integration with signage between the ESC and the Sacramento Valley Station for pedestrian access, and support for the on-street bicycle access to/from the Station to the downtown area, including the ESC area. While there are adequate sidewalks, the access to/from the Sacramento Valley Station via bicycle has slightly improved with the addition of some on-street bicycle signage, safe access, including striped and designated lanes for bicycles would be enhanced were downtown bicycle street improvements to be considered in connection with the ESC and overall downtown bicycle planning objectives. The CCJPA encourages the City of Sacramento and the ESC developers to work closely with local bicycle advocacy groups and the City's own bicycle planner to phase in bicycle improvements that will enhance safe connections between ESC and downtown in general with the Sacramento Valley Station. We do not agree with the scope of how Impact 4.10-7: The Proposed Project would adversely affect existing or planned bicycle facilities or fail to provide for access by bicycle is assessed. The summary of the impact assessment is about parking of bicycles at or around the facility and not about circulation within the downtown area regarding safe on-street access to the ESC area and ultimately, access to the bicycle parking that would be provided. In the same transportation section, automobile and trucking access is considered far outside the scope of the ESC center because there are various intersection impacts. The same is not true of bicycle access in how the document treats and characterizes bicycle access which must travel on existing infrastructure to get to any proposed bicycle parking facilities at the ESC. While bicyclists to/from Capitol Corridor may not add much to the overall numbers, we continue to hear from our riders with bicycles that access to/from Sacramento's downtown is not ideal and discourages some from utilizing a bicycle were access to be made safer in the intervening downtown/ESC/Sacramento Valley Station areas. We encourage the ESC developers and City of Sacramento to take a more holistic approach to bicycle circulation and work with on-street access improvements that make bicycling a safer and more highly utilized means of access to/from the ESC. The CCJPA is also supporting Sacramento's bicycle share effort and we would want to see how bicycle sharing will be integrated into the ESC - there is no mention of that in the document that we could identify.

Parking is limited at the Sacramento Valley Station but usually will clear out by game/event time so we are not specifically concerned about vehicle parking utilizing the parking lot at the Sacramento Valley Station.

One last matter is that Capitol Corridor may, at some point in the future be in a position to alter our schedule to become a more viable transportation alternative to/from ESC games/events. If this were to happen, not only would CCJPA explore partnership opportunities as we do with other event locations and sports teams, the comments provided above

which focussed on the most glaring mode of access issue, bicycle access, would become that much more vital.

Thank you for your consideration of these comments.

Jim Allison  
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