

Friends of the



Sacramento
River Parkway

Supporting public access and
recreation along the Sacramento River

January 31, 2014

VIA E-MAIL (SRJohnsond@cityofsacramento.org) AND U.S. MAIL

Mr. Scott Johnson
City of Sacramento Community Services Department
Environmental Planning Services
300 Richards Boulevard, Third Floor
Sacramento, CA 95811

Re: Comments on the Draft Environmental Impact Report for the
Sacramento Entertainment and Sports Center

Dear Mr. Johnson:

Please accept these comments from Friends of the Sacramento River Parkway (“FSRP”) to the Draft Environmental Impact Report (“DEIR”) for the Sacramento Entertainment and Sports Center (“ESC”).

FSRP’S INTERESTS

FSRP is an unincorporated association of individuals devoted to the culmination of the City’s forty-year-old plan for a multi-purpose trail on or along the Sacramento River from the City’s northern boundary in Natomas to its southern boundary near the town of Freeport. Our immediate goal is completion of the on-levee trail through the Pocket and Little Pocket neighborhoods.

Our comments here should not be construed as opposition to or support for the ESC. FSRP takes no position on the ESC. However, the ESC presents opportunities to improve conditions not just for current bicyclists, but to encourage more bicycling in our community, and to gain the significant health and environmental benefits when we can get our residents out of their cars and on bicycles.

THE DEIR'S BICYCLE-RELATED DEFICIENCIES

The DEIR both relies on bicycle travel to qualify the DEIR for exemption from stricter environmental laws, then minimizes the need to address improved bicycle access. All the while, the DEIR fails to explore additional means to encourage users to bicycle to events at the ESC.

The DEIR argues that it qualifies for the protections of Senate Bill 743 that streamlines the environmental review process if the project meets certain benchmarks. The DEIR claims that the ESC qualifies because:

[t]he Proposed Project would encourage the use of zero-emission and low-emission vehicles (ER 6.1.14). Due to its location and proximity to other complementary uses, the Proposed Project would encourage pedestrian and bicycle access. In addition, the Proposed Project would include a bicycle valet service for the larger events.

(Summary at S-5.) The DEIR claims compliance with the 2030 Sacramento General Plan's goal for "Improved Air Quality":

ER 6.1.14 Zero-Emission and Low-Emission Vehicle Use. The City shall encourage the use of zero-emission vehicles, low-emission vehicles, bicycles and other non-motorized vehicles, and car-sharing programs by requiring sufficient and convenient infrastructure and parking facilities in residential developments and employment centers to accommodate these vehicles.

(Chapter 4, Section 5, Global Climate Change at 4.5-14.) The DEIR's "proof" of compliance is a statement identical to the statement above found at page 5 of the DEIR's summary. (*See* DEIR, Chapter 4, Section 5, Global Climate change at 4.5-15.)

Yet, rather than proposing any significant steps to encourage users to bicycle to events, the DEIR relies on an unrealistic build-it-and-they-will-come theory. The DEIR identifies short-term bicycle parking locations, which it presumably must provide, and a long-term bicycle parking area, primarily or exclusively for employees. Then the DEIR commits only that the ESC "may also" provide bicycle valet parking for "larger events." (*See, e.g.*, Chapter 4, Section 10, Transportation at 4.10-101.)

The DEIR recognizes that the American River Parkway bike trail is a logical thruway for bicyclists coming from many areas. The DEIR recognizes that these bicyclists would arrive in Old Sacramento and use the K Street multi-use underpass to access the ESC. (The DEIR incorrectly identifies the bike trail from Discovery Park to Old Sacramento as the "American River Bike Trail." (*See, e.g.*, Chapter 4, Section 10, Transportation at 4.10-19.) In fact, that trail is the Sacramento River Parkway bike trail. The distinction is significant in that Sacramento County exercises primary jurisdiction over the American River bike trail, and Sacramento City exercises primary jurisdiction over the Sacramento River Parkway bike trail.)

As it must, the DEIR implicitly recognizes that bicyclists will not flock to the ESC unless they are provided with safe, secure, attended parking. Providing such parking at no or low cost would further encourage bicycle travel to the ESC. However, the proposal for a “bicycle valet service” is troubling for its lack of detail or commitment. The DEIR does not identify who would provide the bike valet, and does not commit to provide valet parking, though implying it “may” provide valet parking at undefined “larger events.” The proposal even lacks a dedicated space other than offering possibilities for St. Rose of Lima Park or on a closed-to-traffic Sixth Street. The DEIR does not recognize that such a transient facility would be difficult to protect from thefts, and the proposed locations are on the opposite side of the ESC from the multi-use underpass from Old Sacramento.

Despite its lack of a realistic encouragement to bicycling, the DEIR relies on the reduction of greenhouse gases from users bicycling to the ESC. To the extent that bicycles can be safely and conveniently funneled through K Street in the underpass, bicyclists reduce other significant impacts from events at the ESC. Every bicyclist arriving through Old Sacramento is one less vehicle contributing to the traffic congestion around the ESC. Presumably, few automobiles would access the ESC through Old Sacramento except to the extent they use parking facilities at either end of Old Sacramento, but would be unlikely to drive north or south through Old Sacramento. On the other hand, if valet parking materializes at locations that the DEIR currently proposes, bicyclists will add to congestion as they try to get around the ESC to valet parking.

THE KINGS AND THE CITY CAN MEANINGFULLY ENCOURAGE BICYCLE USAGE

Just as the DEIR recognizes the benefit of the American River Bike Trail (and the misidentified Sacramento River Parkway bike trail from Discovery Park), the ESC would benefit greatly from a completed Sacramento River Parkway bike trail from south of the ESC.

The trail remains only about half complete because of the need to acquire easements from property owners on the levee. As a result, bicyclists face difficult, risky detours on and across busy city streets (see attached photographs). A completed bike trail would be a natural and preferred route for bicyclists in some parts of Land Park, South Land Park, and all of the Little Pocket, Pocket, Meadowview, and the coming Delta Shores neighborhoods.

Completing this bike trail would not just encourage present-day bicyclists to ride to the ESC. A frequently cited discussion about bicycling in Portland, Oregon, estimates that just a little more than 7% of the population are “Strong & Fearless” riders or “Enthusied & Confident” riders who are comfortable in automobile traffic. Just 32% of the population will not ride a bicycle under any circumstances. The majority – 60% of the population – are “Interested but Concerned” about bicycling. These are people who do not fear other bicyclists, or pedestrians, or the risk of a bicycle-only crash. But they are averse to riding in automobile traffic. (See, e.g., <http://www.portlandoregon.gov/transportation/article/158497>.) Completing the Sacramento River Parkway bike trail would give this segment of the population the encouragement they need to bicycle to events. Furthermore, those of us who are Enthusied & Confident riders will have a greater incentive to ride to the ESC with a safe, off-rod route to the ESC.

The City and the Kings can incorporate true encouragement of bicycle use in the final EIR if the City makes a binding commitment through the EIR process to complete the Sacramento River Parkway in a timely fashion, and if the City and the Kings make a financial commitment to the bike trail's completion.

Do not hesitate to contact us if we can provide additional information. Please direct any questions to me at jhought@houtlaw.com or by phone at 916-396-7239. We would also be pleased to participate in mediation under Public Resources Code section 21168.6.6, subsection (e)(5)(A) to further explore the means of encouraging bicycle travel to events at the ESC.

Yours truly,

/S/

James E. Hought

GUIDE TO THE ATTACHMENT

The attached photographs illustrate problems for bicyclists created by the existing detours on the Sacramento River Parkway. These descriptions follow the trail from north to south (upriver to downriver).

- Figure 1: The Westin Hotel (formerly, Le Rivage) marks the beginning of an almost one-mile detour on Riverside Boulevard through the Little Pocket neighborhood. To ride legally, bicyclists heading upriver are supposed to cross at the designated bicycle crosswalk. However, because automobile traffic from the north is rounding a blind corner under Interstate 5, and because traffic can be heavy during much of the day, crossing the road legally often results in long delays for bicyclists. As a result, most bicyclists seize opportunities to cross the road dangerously and illegally before this point to avoid the delay, riding the wrong side of the road until they get to the ramp for the bike trail.
- Figure 2: Bicyclists' next major obstacle is a difficult and busy intersection at Riverside Boulevard and Seamas Avenue. This photo shows the view for bicyclists traveling southbound (downriver).
- Figure 3: Bicyclists traveling northbound (upriver) see this view. The sign warns, "TRAFFIC FROM THE RIGHT DOES NOT STOP." Bicyclists encounter two difficulties: cars turning right from Riverside to Seamas that don't give a prior-arriving bicyclist the right of way, and traffic on Seamas that does not stop, making it difficult for a bicyclist to time a crossing of Seamas.
- Figure 4: Complicating the problem for bicyclists, southbound cars exiting I-5 are often driven by local residents who know they don't have a stop sign at Riverside. Seeing a green light, some exit at a high rate of speed heading west on Seamas, creating a dangerous situation for a bicyclist starting to cross Seamas without anticipating the exiting vehicle.
- Figure 5: Traveling southbound from Seamas toward 35th Avenue, Riverside is two lanes with little additional room, but a narrow bike lane is often blocked by debris piles, forcing bicyclists to ride in the roadway.
- Figure 6: Near 35th Avenue, a short half-mile section of bike trail resumes on the levee. Access to and from the levee here is less than adequate. The incline is too steep for some bicyclists going up to the levee. For bicyclists coming down from the levee, the incline leads directly to the roadway, creating a risk for any bicyclist who is inexperienced or with inadequate brakes.
- Figure 7: At the end of the half-mile section, the bike trail ends at Zacharias Park and bicyclists ride onto Clipper Way.

- Figure 8: A pedestrian and bicycle overpass on Riverside Boulevard into Seymour Park is the designated detour for the continuation of the bike trail. Because it is not intuitive that the Parkway detour would be perpendicular to the river, bicyclists who are not familiar with Greenhaven-Pocket do not recognize that the overpass constitutes the detour.
- Figure 9: As a result, these bicyclists turn right and ride down Riverside Boulevard to Pocket Road for more than three miles until the bike trail picks up again at Garcia Bend Park. Understandably, recreational riders tend not to ride this route more than once. The sporadic nature of the bike trail makes the Sacramento River Parkway an underutilized resource.
- Figure 10: Even those bicyclists who attempt to use the detour face a number of difficulties. Seymour Park is primarily a park rather than a bikeway. Park users can interfere with bicycling, especially on sidewalks that do not give visual cues that the sidewalks are intended for mixed users.
- Figure 11: The sidewalks in Seymour Park are concrete slab sidewalks. Settling slabs and slabs raised by tree roots create hazards for bicyclists, especially for the narrow tires of a road bike that can experience a pinch flat when hitting a sharp obstacle.
- Figure 12: Both through Seymour Park and in the Pocket Canal Parkway, a multitude of trails make it difficult to remain on the Parkway detour. Even local residents are confused unless they use the detour and other trails often.
- Figure 13: The Pocket Canal Parkway, beginning after a pedestrian and bicycle overcrossing on Florin Road, is more conducive to bicycling. However, the detour requires bicyclists to cross two busy streets.
- Figure 14: Rush River Drive is the primary thoroughfare for residents of the original Greenhaven development to the Promenade Shopping Center, a busy retail facility in the center of the Greenhaven-Pocket neighborhood.
- Figure 15: Riverside Boulevard becomes Pocket Road between Zacharias Park and Garcia Bend Park.
- Figure 16: Riverside/Pocket is a broad, four-lane road with a forty mile per hour speed limit. The wide roadway gives motorists a sense of security that causes many to drive well in excess of the speed limit.
- Figure 17: To rejoin the bike trail, bicyclist ride another quarter mile along Pocket Road before turning into Garcia Bend Park.

Figure 18: The final two-mile section of the Parkway proceeds from Garcia Bend to the Freeport Regional Water Intake. The lack of any facilities at the water intake or any easy means to continue to another location, discourage bicyclists from using the final section of the Parkway. This will be remedied in part when an extension of the bike trail is completed within the next few months into the Bill Conlin Youth Sports Complex, where a drinking fountain and rest rooms are available.

This will also be the route for residents of the coming Delta Shores project to join the bike trail. However, the intermittent detours will discourage many bicyclists from using the Parkway for recreation or commuting until it is a continuous, off-road trail.



Figure 1.



Figure 2.



Figure 3.



Figure 4.



Figure 5.



Figure 6.



Figure 7.



Figure 8.



Figure 9.



Figure 10.



Figure 11.



Figure 12.



Figure 13.



Figure 14.



Figure 15.



Figure 16.



Figure 17.



Figure 18.