



August 31, 2006

Ms. Dana Allen, Senior Planner  
City of Sacramento, Development Services Department  
Environmental Planning Services  
North Permit Center  
2101 Arena Boulevard, 2<sup>nd</sup> Floor  
Sacramento, CA 95834

RE: Draft Environmental Impact Report for EPIC Tower (Project No. P05-138)

Ms. Allen:

WALKSacramento is pleased to offer comments on the Draft Environmental Impact Report (DEIR) for the 49 story EPIC Residential Tower proposal on 40,000 square feet including 65,850 square feet of retail/office and 354 residential condominium units.

WALKSacramento is a member of the Partnership for Active Communities, an Active Living by Design project funded by the Robert Wood Johnson Foundation. The Partnership is working to support increased physical activity such as walking and bicycling in local neighborhoods as well as helping to create community environments that support walking and bicycling. One way that we are doing this is through the review of proposed development projects. The benefits of such active environments include improved physical fitness, less motor vehicle traffic congestion, better air quality, and a stronger sense of cohesion and safety in local neighborhoods.

After reviewing the project's DEIR and examining the project site, we offer the following comments and recommendations:

1. Estimate Pedestrian and Bicycle Trip Generation: A table for motor vehicle trip generation is included and transit trips are discussed, but there is no discussion of specifics for the number of trips by foot or bicycle. For pedestrians, use is described as "many pedestrians are observed." WALKSacramento believes that in order to accurately determine the impact on pedestrians and bicycles, it is necessary to assess the current and future trips made on foot and bike. Considering the current level of

use, the height of the proposed building, the attractive uses planned at the site, and the adjoining light rail station, this has the potential to be one of the most heavily walked areas in the City and deserves additional investigation and discussion.

2. Impact of Signal Timing Mitigation on Pedestrians Unclear: The primary mitigation described for the motor vehicle traffic generated by the project is to modify traffic signal phasing. It was unclear if the impacts on pedestrians due to changes in the signal timing was studied. Considering the high volume of pedestrian use on the downtown streets, it would be appropriate to investigate the impact of this change on pedestrians and include discussion on the results. In addition, it is unclear if impact analysis for similar, planned, nearby tower projects is included in the signal timing strategy.
3. Impact on Bikeways is Significant: WALKSacramento believes that there will be a significant impact on bicyclists which will in turn be a significant impact on pedestrians. There is a lack of acceptable bicycle facilities to access the site. Both 12<sup>th</sup> Street and I Street provide no facilities and the current volumes and speed of automobile and truck traffic make safe use difficult. With at least 3,180 additional external motor vehicle trips estimated to be generated by the project, the situation will become more difficult for cyclists.

Despite the presence of bike lanes on 13<sup>th</sup> Street, it is still very difficult to access the intersection of 12<sup>th</sup> and I Street on a bicycle. We recommend that those involved in preparation of the report try to legally ride a bicycle from a destination a half mile away from the north, south, east, and west to the project to get a feel for the situation. If the project goes forward without additional bicycle accommodation, there will be greater use of the sidewalks by bicycles which will create conflicts with pedestrians.

We strongly recommend that the proposed on-street bike lanes for G and H Streets, which is included in the Bicycle Master Plan, be fast tracked and completed as a mitigation for this project. Improving G and H Streets will help, but additional bicycle accommodations on both 12<sup>th</sup> and I Streets are appropriate to investigate. For example, a 3 to 2 lane conversion on I Street with bike lanes on both sides would make it much easier for bicyclists to access the site and would encourage current motorists to use bicycles for some of their trips. There is significant unmet demand for bicycle travel in the downtown area that could be met with such a facility, and additionally mitigate the project's motor vehicle traffic impacts.

Another possibility we encourage exploring is bicycle lanes along Terminal Way, including a contra-flow lane for bicycles. This would provide an

alternative to bicycles having to use I Street and would be an easy way to link to existing bicycle facilities on 13<sup>th</sup> Street.

An important aspect of encouraging bicycle use and reducing automobile trips is support for cycling in terms of racks, lockers, and shower facilities for bicycle commuters. While these amenities are mentioned, additional details are required to determine if they will successfully encourage bicycle use. The details for cycling should be similar to the details provided for motor vehicles, including the number of spots and location of bicycle parking facilities.

4. Public art can be used to mitigate vehicle trips: The 1% of project cost that is to be allocated to public art can be used in part to create a visually interesting environment that would encourage pedestrian and transit activity. Unique artistic work that can only be seen while walking would be a draw for people to explore the surrounding environment on foot. Using some of the funding to make the light rail stop intriguing and inviting would encourage its use and help reduce vehicle trips further.
5. Encourage transit use to mitigate vehicle trips: Considering the proximity to light rail and bus stops, the project should take an active role in promoting transit use in an effort to mitigate vehicle trips. Options include complementary Regional Transit (RT) passes and maps, investing in an individualized marketing plan in conjunction with RT to provide information specific to project tenants, and/or contributing to efforts to improve the quality of bus stops and light rail stations in the surrounding quarter-mile.

Thank you for your consideration of these comments and recommendations. If you have questions or need additional information, please contact Scott Clark or me at (916) 446-9255 or via email at [sclark@walksacramento.org](mailto:sclark@walksacramento.org) or [ageraghty@walksacramento.org](mailto:ageraghty@walksacramento.org).

Sincerely,  
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