



7/31/2017

VIA EMAIL

Miriam Lim, Junior Planner  
City of Sacramento community Development Department  
300 Richards Blvd., 3<sup>rd</sup> Floor  
Sacramento, CA 95811

**RE: The Mill @ Broadway Phase 2B Expansion Area (Z17-117)**

Dear Ms. Lim:

WALKSacramento has reviewed the project routing for The Mill @ Broadway Phase 2B Expansion Area (Z17-117). We offer the following comments to improve the walkability of the project.

One of the goals of the Northwest Land Park Planned Unit Development (NWLP PUD) Guidelines is a physical layout and land use mix that promotes walking, biking and transit. The Guidelines require that all homes face a street, open space or a courtyard within a pedestrian-oriented neighborhood that encourages human interaction. Placing homes that face streets, open space and semi-public courtyards enhances community cohesion by facilitating more frequent interaction among community members, improves personal safety and sense of well-being by increasing “eyes on the street,” and can reduce personal and property crimes by placing the front of homes and their front doors within the view of neighbors and street activity.

The Mill @ Broadway Phase 2B Expansion Area project consists of 20 duplexes and three single-family detached condominiums. More than half of these buildings do not face the street, open space or a courtyard, and none have a dedicated pedestrian walkway connecting to the street. With this arrangement of buildings, it appears the project fails to follow five specific requirements of the NWLP PUD Guidelines.

*Section 2.5 – Dimensional Standards* specifies the maximum street setback for residential buildings shall be 20’. Thirteen of its twenty-three buildings, i.e. buildings 10-18 and 20-23 (using the numbering on the June 23, 2017 Phase 2B Architectural Site Plan) are between 70’ and 175’ from the street.

*Section 2.6.1 – Building Orientation* requires that front façades shall be oriented to a street, public open space, and/or courtyards, and buildings shall provide a clear pedestrian connection to a nearby street. Buildings 10-18 and 20-23 have their garages on a private alley and none have a clear pedestrian connection to the street. The buildings place front

doors on an interior sidewalk, but the sidewalk doesn't provide the primary pedestrian access way to the street (see 3.5 Private Courtyards, below).

Section 3.1 – *Open Space Framework* specifies that semi private courtyards will be included for attached and multifamily residential buildings. Duplex buildings 13, 15-18 and 20-23 are buildings with attached units and, therefore, should have semi-private courtyards.

Section 3.2 – *Open Space Development* specifies that the community will provide semi-private open space for all duplex units, among others, that don't front on streets, parks and/or greenway corridors. Buildings 13, 15-18 and 20-23 are duplexes and, therefore, should have private courtyards.

Section 3.5 – *Private Courtyards* specifies that courtyards will act as common outdoor gathering spaces for residences with limited or no private outdoor yards, they will be the primary pedestrian linkages for access to individual residences that don't front directly on a street or public park, they'll include a paved sidewalk, and at least 75% will have a minimum width of 20' with the remainder at least 10' wide. Ten of the twelve landscaped areas with sidewalks that connect to the entrance doors of the interior duplex and condominium buildings are 8.5' wide or less. These narrow strips of sidewalk with a few feet of landscaping will not provide any outdoor gathering spaces, nor do they connect to the street. It appears that none of the interior units have private outdoor yards, so private courtyards that meet the requirements should be provided.

Placing residential entrance doors out of view from active public spaces creates a personal safety risk in addition to reducing walkability and human interaction. The NWLP PUD Guidelines appropriately require front facades to face the street, open space or courtyards; this should result in entrance doors being in locations where they're likely to be within view of residents and legitimate visitors. The Mill @ Broadway Phase 2B Expansion Area site plan doesn't fulfill this requirement – all of the buildings on the interior of the lot, i.e. buildings 10-23, don't have entrance doors within clear view of the street, and since the project doesn't have any courtyards, the entrance doors are also not within clear view of courtyards.

Further compounding the safety, walkability and human interaction deficiencies of the project is the orientation of the duplexes along the south and east edge of the project parcel. Seven of the duplexes are located with their front facades near these parcel lines.

Lane Homes Building One duplexes Buildings 16-18 have about 2' between the building and the parcel line, with the front door 3' from the rear yards of Phase 2 condominiums to the south. Buildings 20-22 are setback about 10' from the east parcel line. Building 23 has two corners close to the parcel lines, one that's 1.2' and the other that's 6.4' from the line. It's not clear whether the duplexes will be facing a fence, a wall or the rear facades of buildings on the adjacent parcels.

Building 23, the Lane Homes Building Two duplex that's not on the street, has the entrance doors for its two units on the sides, rather than the front or rear, of the building. Interestingly, the schematic elevation for the building identifies the garage elevation as the "front." However, the entrance doors are not within view of a street or courtyard.

In summary, the proposed site plan layout will not provide a walkable and safe environment for pedestrians and residents, especially since the front doors of many units will be essentially behind those units. The interior buildings should have courtyards that provide common gathering space for residents of the buildings and a continuous walkway that connects to the street sidewalk and connects units to one another. Because a 10' wall or fence may be constructed along the east and south parcel lines, and the parcel to the south has rear and side yards of condominiums up against the parcel line, placing courtyards along the east and south edges of the project site may not be beneficial or appropriate, or be in conformance with the NWLP PUD Guidelines.

WALKSacramento is working to support increased physical activity such as walking and bicycling in local neighborhoods as well as helping to create community environments that support walking and bicycling. The benefits include improved physical fitness, less motor vehicle traffic congestion, better air quality, and a stronger sense of cohesion and safety in local neighborhoods.

Thank you for your consideration of these comments and recommendations. If you have questions or need additional information, please contact me.

Sincerely,

Chris Holm  
Project Manager

Attachment: Development Checklist for Biking and Walking

# **DEVELOPMENT CHECKLIST for BIKING and WALKING**

*Prepared by WALKSacramento and SABA (Sacramento Area Bicycle Advocates)  
September 2012*

This checklist is provided to give an indication of design, engineering, and policy elements that we consider when reviewing development projects.

## **POLICIES**

- Walking and biking is a priority
- Adopted a policy to develop a full multi-modal and ADA accessible transportation system

## *Project Review and Comment*

## **POLICY CONSIDERATIONS**

- Pedestrian Master Plan
- Bicycle Master Plan
- Regional Blueprint
- Regional Blueprint Consistent General Plans
- Adopted Climate Action Plans
- Subdivision ordinances to support pedestrian and bicycle access and safety
- Zoning ordinance to support pedestrian and bicycle access and safety

## **ENGINEERING**

- SIDEWALKS & BIKELANES ON BOTH SIDES OF MAJOR ROADWAYS**
  - Pedestrian Level of Service "C" or better on arterials
  - Bicycle Level of Service "C" or better on arterials
- SAFE CROSSINGS FOR PEDESTRIANS**
  - every 300-600 feet on major arterials
  - well lit, marked crosswalks
  - audible signals & count-down signals
  - median refuge islands
- SPEED MANAGEMENT**
  - Speed limits based on safety of pedestrians and bicyclists
  - Implement "road diets" where there is excess lane capacity
- STREET DESIGN STANDARDS**
  - Maximize pedestrian and bicyclist safety
  - Sidewalks buffered by trees and landscaping on major arterials
  - Vertical curbs
  - 5' minimum sidewalk widths, 8' in front of schools
  - 6' minimum bike lanes on busy streets

- ❑ **INTERSECTIONS**
  - Median refuge islands for pedestrians
  - Signal timing to enable safe passage
  - Signal detection for bicyclists
  - Crossings on all 4 legs of intersections
  
- ❑ **ELIMINATE BARRIERS**
  - Freeway, railroad, river and creek crossings
  - Obstructions in sidewalks and bike lanes

### **NEW DEVELOPMENT – REQUIRE**

- ❑ Walking & bicycling circulation plans for all new development
- ❑ Direct and convenient connections to activity centers, including schools, stores, parks, transit
- ❑ Mixed uses and other transit supporting uses within ¼ mile of light rail stations or bus stops with frequent service
- ❑ Minimum width streets
- ❑ Maximum block length of 400'
- ❑ 4-lane maximum for arterials; Recommend 2 lanes wherever possible

### **NEW DEVELOPMENT – DISCOURAGE**

- ❑ Cul-de-sacs (unless it includes bike/ped connections)
- ❑ Gated and/or walled communities
- ❑ Meandering sidewalks
- ❑ Inappropriate uses near transit (gas stations, drive-thru restaurants, mini storage and other auto dependent uses)

### **BUILDINGS – REQUIRE**

- ❑ Direct access for pedestrians from the street
- ❑ Attractive and convenient stairways
- ❑ Bicycle parking – long & short term
- ❑ Shower & clothing lockers

### **OLDER NEIGHBORHOODS**

- ❑ Improve street crossings
- ❑ Reduce speeds
- ❑ Provide new connections
- ❑ Create short cuts for walkers and bicyclists by purchase of properties or other means
- ❑ Provide sidewalks on both sides of major streets

## *Policy Review and Comment*

### **ENFORCEMENT & MAINTENANCE**

- ❑ Enforce speed limits
- ❑ Enforce crosswalk rules – conduct crosswalk sting operations
- ❑ Enforce restrictions against parking on sidewalks
- ❑ Enforce bicycle rules including riding with traffic, lights at night, stopping at red lights
- ❑ Implement CVC 267 setting speed limits based on pedestrian and bicyclist safety
- ❑ Sweep streets and fix hazards
- ❑ Repair and replace broken sidewalks

### **EDUCATION**

- ❑ Train staff on pedestrian and bicycle facility design.
- ❑ Train development community about pedestrian and bicycle planning and safety issues
- ❑ Bicycle skills training

### **FUNDING**

- ❑ Include pedestrian and bicycle facilities in capital improvement programs
- ❑ Include pedestrian and bicycle facilities as a part of roadway widening and improvement projects
- ❑ Support Measure A pedestrian and bicycle facility allocation
- ❑ Set priorities based on safety and latent demand
- ❑ SACOG Community Design grants & Bike/Ped grants
- ❑ California Bicycle transportation Account
- ❑ Safe Routes to School

*www.walksacramento.org*

WALKSacramento  
909 12<sup>th</sup> Street, Suite 203  
Sacramento, CA 95814  
(916) 446-9255

*www.sacbike.org*

Sacramento Area Bicycle Advocates  
909 12th Street, Suite 116  
Sacramento, CA 95814  
(916) 444-6600