



1/5/2018

VIA EMAIL

Scott Johnson, Associate Planner  
City of Sacramento, Community Development Department  
Environmental Planning Services  
300 Richards Boulevard, Third Floor  
Sacramento, CA 95811

**RE: Draft Environmental Impact Report (EIR) for the Sacramento Convention Center Renovation and Expansion & 15th/K Street Hotel Projects**

Dear Mr. Johnson:

WALKSacramento thanks you for the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the Sacramento Convention Center (SCC) Renovation and Expansion & 15th/K Street Hotel projects. We have reviewed the Draft EIR to identify errors or inadequacies in the analysis of impacts to pedestrians and pedestrian facilities.

**I. Pedestrian Circulation Analysis**

The DEIR analyzed pedestrian impacts by evaluating the Pedestrian Level of Service (PLOS) at AM and PM peak hours, where the pedestrian flow rate was used to categorize the service levels for sidewalks. None of the analyzed sidewalks were found to operate at failing conditions, and the results are shown in Tables 4.9-17 and 21. However, we are concerned the analysis may be inadequate because it may not have accounted for 1) larger events, 2) pedestrians traveling in both directions along the block, 3) pedestrian activity specific to transit stops, 4) pedestrian and bicycle movements on the west side of 15<sup>th</sup> Street between J Street and K Street, and 5) pedestrian and bicycle movements on the West K Street Plaza.

First, it appears that PLOS was analyzed for SCC events having attendance maximums of 6,367 persons baseline conditions based upon event data from calendar year 2015, and 8,202 persons baseline plus project conditions. However, the project description in the Summary chapter states that for a conservative analysis, it was assumed that the largest events on an annual basis will have attendance over 15,000 per day, and Chapter 2 indicates there was an average event attendance of 5,175 over the years 2009 to 2016. These numbers indicate there could be event crowds much larger than 6,367 for which the PLOS was not evaluated.

Second, the PLOS evaluation didn't include the cross flows and obstructions to movement created by transit users at the J Street bus stop immediately outside of the North Lobby doors. This mixing of pedestrians moving west and east on J street, north on 14<sup>th</sup> Street, transit, shuttle, carsharing and private vehicle loading and unloading, plus stationary pedestrians that are socializing or waiting for pick-up or transit will diminish pedestrian movement.

Third, an evaluation for the west side of 15<sup>th</sup> Street between J Street and K Street which will have several conflicting activities was not included. There will be pedestrians entering and/or leaving the East Lobby near K Street, bicyclists using the bike parking near mid-block, and future streetcar passengers at the stop near the East Lobby. This mixing of modes and activities may diminish the pedestrian level of service.

Fourth, the impacts to pedestrian circulation created by Hotel events do not appear to have been considered. Table 4.9-21 Peak Hour Sidewalk Pedestrian Volumes and LOS – Baseline Plus SCC Project and Hotel Project Conditions includes 1,591 AM peak hour trips and 2,445 PM peak hour trips but no pedestrian flow rate or LOS associated with the Hotel. Note 5 in the table states without a detailed site plan, the pedestrian flow estimate for 15<sup>th</sup> Street between K Street and L Street assumes that all pedestrians entering or exiting the hotel would be using the hotel's front door on 15<sup>th</sup> Street near K Street, yet there are no flow rate or LOS values given. The sidewalk segment impacted by the Hotel project of greatest concern is 15<sup>th</sup> Street between J Street and K Street because of the mixing of pedestrian activities.

Fifth, the SCC project proposes to reconfigure the existing walkway between K Street at 13<sup>th</sup> Street intersection and the K Street at 14<sup>th</sup> Street intersection to include an outdoor Activities Plaza and a shared bicycle-pedestrian path. This area, designated the West K Street Plaza in the DEIR, is also the location of a planned Class I bike path. The pathway will have mixing of pedestrians and bicyclists that may cause a significant degradation of pedestrian level of service. The PLOS for the West K Street Plaza should be evaluated.

## **II. Bike parking presenting pedestrian obstructions**

If sufficient short-term bicycle parking is not provided for the SCC, bicycles will be parked in locations that are inappropriate and may interfere with pedestrian circulation and/or create hazards for pedestrians. The DEIR text states that bicycle parking provided by the SCC would comply with the Planning and Development Code, and that short-term bicycle parking would most likely be located in the Activities Plaza or near the east or west lobby entrances, while Figure 2-13 shows the parking located in two places: on the west side of 13<sup>th</sup> Street within the pedestrian-only section of K Street, and behind the sidewalk on the west side of 15<sup>th</sup> Street between the church and the SCC.

The Planning and Development Code requires a minimum number of bicycle parking spaces based upon the land use. Our review of the City's parking regulations indicates that between 157 and 318 or more will be required. The SCC should provide adequate and convenient short-term bicycle parking to prevent impacts to pedestrians circulation but the DEIR doesn't indicate this is likely to occur.

## **III. Mitigation Measures**

Mitigation Measure 4.9-2 (SCC) would implement the Event Transportation Management Plan (ETMP) to ensure that "Through pedestrian flow management, pedestrians do not spill out of sidewalks onto streets with moving vehicles, or out of crosswalks when crossing the street, particularly along J Street, K Street, 13th Street, and 15th Street." Should further analysis of Pedestrian Level of Service indicate the proposed sidewalks on the project site are inadequate

for the number of pedestrians, the ETMP needs to provide specific actions that would prevent pedestrians from spilling out onto the travel lanes on streets adjacent to the SCC site.

Mitigation Measure 4.9-4(a) (SCC) ii. b. would provide for signed and marked bicycle detours around the SCC site during outdoor events. The state of the bicycle network in the vicinity of the SCC is of such that many bicyclists may be inclined to ride on sidewalks in some places rather than utilize the detour route. Details of the detour routes should be identified in order to evaluate the impact SCC events would have on bicycle safety.

Mitigation Measure 4.9-4(b) (Hotel) requires that a site access and circulation study be conducted as part of the entitlement process, and it recommends adequately sized sidewalks, defined as being eight feet wide with an eight-foot wide planter, to serve the hotel events and pedestrian circulation. Looking at the actual and effective widths of the sidewalks evaluated in Table 4.9-21, eight feet appears to be on the narrow side. The mitigation measure should define adequate width as an effective sidewalk width of eight feet as calculated by the 2010 HCM.

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.

Sincerely,

Chris Holm  
Project Analyst