

Scott Johnson

From: J A <jjadamsj@gmail.com>
Sent: Wednesday, January 08, 2014 9:25 PM
To: Scott Johnson
Subject: ESC Draft EIR Public Comment

Hello,

Below are my comments related to three sections of the Draft EIR for the proposed ESC development downtown.

Transportation:

- There is not an analysis of impacts to on-street parking during ESC events. Considering current street rates are lower than potential off-street parking rates for ESC events, many patrons will fill up downtown street parking first, then start filling up the off-street spaces.

What is proposed to prevent all the street parking from being taken by ESC patrons? What about the impacts on local business during those times?

I'm thinking that on event nights no one will want to come downtown because there will not be easy-access, inexpensive parking near businesses. I'd hate to cancel dinner plans because there is only \$10 parking off-street blocks from my destination, but that would be the case since that isn't a reasonable charge for simply going out to eat downtown.

- Why were intersections at 10th and W and 9th and W analyzed for impacts? This is the signed gateway to 'Downtown' from Highway 50, so all points south of the American river to the east and south around Hwy. 99 will come through this intersection.

Aesthetics:

- The project proposes to remove significant shaded area that exists at the downtown plaza site. We should be requiring shade, not the 'potential for shade'.

The current walkways are generally covered either by the 2nd floor walkway or shade structures/roofing further up (with the exception of the east side of 5th street between L and J) and the center of the walkways are also mostly shaded despite the open areas in the roofing. L street has several trees that provide needed shade in the area and nearby bus stops. This makes visiting the area in inclement and hot weather much more bearable and welcoming. The ESC proposal does not include anything near replacement shading or planting in relation to the plaza. The draft EIR even notes that L street will only be

protected from rain (although I'm not sure they can prevent the runoff from coming off the side of the building), with no shade provided at all (even to replace the large tree at of the NE corner of 6th and L, might be an english oak). Similarly, much of the north and west of the ESC area will be without shade, making this part of town unbearable and unwelcoming during the summer. Also, connectivity will be reduced during inclement weather, as people will have a much larger area/distance to cross to reach the rest of the site without being rained on.

- There is very little discussion of the landscaping of the event plaza. What does the city want to see in such a space? It currently reads like the city just appreciates the space and the developer can do what they want with the area. Since it is city land, can it be more like a park? (albeit over a parking lot)
- Can we require removal of the 'clock tower' on K between Macy's and the parking garage? It looks terrible and doesn't function.

Biological Resources:

- It seems like much of the requirements related to street trees to be removed for the proposed project are related to city code section 12.56, which leaves it to the director to determine appropriate replacement trees, locations and sizes. I found the following guidance on replacement trees (12.56.090):
 - A. If the city street tree being removed is six inches or larger in diameter, measured four and one-half feet above ground, then the permittee shall cause to be replanted a tree of at least twenty-four (24) inch box size.
 - B. If the city street tree being removed is smaller than six inches diameter, measured four and one-half feet above ground, then the replacement tree shall be a minimum of fifteen (15) gallon can size. (Prior code § 45.01.009)
- Is it possible to instead require replacement trees for the proposed project replace trees of 6 inches or larger in diameter with a tree of at least 7 feet tall with a canopy of 5 feet in diameter, to better approximate the tree being removed, but still providing for growth and settling.

What I'm getting at is I don't want it to take 20 years for the replacement trees to reach the stature of their forbearers, as the design life of the project is not more than 30-40 years. We should have reasonably large trees within 5 years of planting, current policy would seem to take 10 years at least. Perhaps specifying the species of tree to be planted that can reach stature quickly?

For example, the replacement trees put on 12th street between R and the S/R alley last year (maybe 2012) were very large at planting and meet the 7 foot/5 foot criteria I indicated above.

- I feel that this project, the proposed centerpiece of our city, should meet slightly stricter requirements than other developments in the city relating to trees. Let's show off our city of trees in this development.
- The Draft EIR is written to incentivize contractors to remove as many street trees as possible, due to the requirement to use TPZ on retained trees. They will likely only retain the heritage trees as required. The EIR should mandate a certain percentage of mature street trees be maintained and go through the TPZ process, perhaps ones on the periphery of the site to allow maximum flexibility for the developer during design/construction.

Thank you for your consideration,

Jim Adams

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