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Dana Mahaffey, Associate Planner
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Environmental Planning Services
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RE: DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE LAND PARK COMMERCIAL CENTER PROJECT

Dear Ms. Mahaffey:

Thank you for the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the Land Park Commercial Center (LPCC) Project.

The Hollywood Park Neighborhood Association (HPNA) acts as the liaison for the Hollywood Park community with various government agencies, businesses and other organizations. Hollywood Park is a traditional Sacramento neighborhood established in the 1950s and is the neighborhood directly across Freeport Boulevard from both the current Raley's location and the proposed LPCC. The HPNA greatly appreciates Raley's' commitment to contributing to and enhancing the communities surrounding its Freeport Boulevard flagship store. In general, the HPNA supports projects that encourage walking and bicycling and reduce vehicle trips, that enhance public safety and discourage crime, that contribute to giving the neighborhood a unique sense of place, and which preserve and enhance the history and character of the neighborhood.

The HPNA has reviewed the Draft EIR for the LPCC Project and offer the following comments to preserve and enhance the livability of Hollywood Park:

LPCC not consistent with City of Sacramento 2035 General Plan

The HPNA disagrees with the DEIR conclusions that the LPCC Project is consistent with intent of the 2035 General Plan (DEIR Executive Summary Page 2, Chap. 3, and Appendix K).

The proposed LPCC site is comprised of land directly adjacent to Freeport Boulevard designated as Urban Corridor Low (about 50% of the project area), and land not adjacent to Freeport Boulevard currently designated as suburban neighborhood low or suburban neighborhood medium. The project applicant is seeking redesignation of land so that the entire project site is designated Urban Corridor Low. The proposed layout of the buildings of the LPCC however is not consistent with the Urban Corridor Low guidelines, such as building façades and entrances that directly address the street and parking located to the side or behind buildings, or accommodated in parking structures. The proposed LPCC sites two small building (Buildings 3 and 4) adjacent to Freeport Boulevard; however, the grocery store, which will account for over 50% of the retail square footage of the project and likely generate much of the trips to the center, will be at the far interior of the project site and over 400 feet away from Freeport Boulevard,

with a large parking lot in front of the grocery store. The siting of Buildings 3 and 4 in effect provides a way to circumvent the spirit of the Urban Corridor Low guidelines to allow the largest and most important building of the project (grocery store) and the project parking lot to be sited contrary to the guidelines. Additionally, the Floor Area Ratio of the proposed project at 0.3 is also at the minimum for Urban Corridor Low projects, and is actually lower (0.24) if not for the exception allowance for outdoor spaces. The HPNA requests that the City ensure that if land currently designated as suburban neighborhood low/medium is redesignated as Urban Corridor Low, then the use of such redesignated land should actually be consistent with the letter and spirit of the Urban Corridor Low designation and with the 2035 General Plan.

LU.2.7.4 recommends street-fronting uses to promote public safety and discourage crime. The proposed LPCC has two small buildings (Buildings 3 and 4) adjacent to Freeport Boulevard and one (Building 5) adjacent to Wentworth Ave; the grocery store will be over 400 feet away from Freeport Boulevard within the project site interior. Buildings 3 and 4 will block the view of the parking lot and the grocery store from the street. The grocery store will have a blocked view from the street and will not serve as “eyes on the street” and vice versa cannot be seen from the street. At night, the parking lot will be “walled off” from all sides. This does not seem to promote public safety and discourage crime. The HPNA recommends orienting the grocery store to be adjacent to and perpendicular to Freeport Boulevard along the north boundary of the project site, orienting Building 3 perpendicular to Freeport Boulevard with its entrance facing the driveway into the LPCC and visible from the street, and moving Building 2 to the interior of the site; see attached Figure 1. This will create better sightlines of the grocery store and parking lot from the street and vice versa.

LU.2.7.7 recommends that buildings engage the street. The proposed LPCC has two small buildings (Buildings 3 and 4) adjacent to Freeport Boulevard and one (Building 5) adjacent to Wentworth Ave. However, the grocery store, which accounts for over 50% of the proposed retail square footage of the LPCC and will likely account for the majority of visits to the LPCC, will be over 400 feet away from Freeport Boulevard. Furthermore, during the Planning and Design Commission meeting in June 2016, the developer indicated that tenants of the two proposed small buildings adjacent to Freeport Boulevard will have the option of having entrances facing the parking lot rather than facing Freeport Boulevard. The HPNA recommends exploring other alternative layouts of the buildings that would be more consistent with the spirit of the General Plan to engage and activate Freeport Boulevard. The grocery store, as likely the most active building in the project, should be oriented to be adjacent to and perpendicular to Freeport Boulevard along the north boundary of the project site, orienting Building 3 perpendicular to Freeport Boulevard along the driveway into the LPCC and visible from the street, and moving Building 2 to the interior of the site; see attached Figure 1. Entrances to the grocery store and Building 3 should face Freeport Boulevard either directly or at the building corners.

The HPNA is concerned that the proposed LPCC project will create another commercial center that is walled off from the street, does not interact or activate street, and create unsafe spaces not visible from the street such as at the Meadowview Plaza (on Meadowview Road and Freeport Boulevard within city limits) and the Florin Towne Center (on Florin Road and 65th Street in unincorporated South Sacramento).

Pedestrian, bicycle, and public transit access to LPCC

The existing Raley's store is 200 feet away from Freeport Boulevard and already presents a pedestrian or bicyclist with a long and potentially unsafe walk or ride across a large parking lot, although the current

site does offer safer access from the side streets. The grocery store at LPCC is proposed to be along the west boundary of the project site, placing it over 400 feet away from Freeport Boulevard and presenting a pedestrian or bicyclist with an even longer and potentially unsafe trip across a large parking lot with no safer alternative access routes from side streets. The longer distances to be traveled by pedestrians and cyclists across the proposed LPCC parking lot will make shopping a more difficult experience for a pedestrian (especially while carrying grocery bags) and create many more negative interactions between vehicles and pedestrians or cyclists, suggesting that the grocery store is aimed at customers arriving by car. Additionally, while there is a public bus stop on Freeport Boulevard directly across the parking lot from the existing Raley's store, the nearest bus stops to the proposed LPCC project are about 400 to 600 feet north and south of the proposed entrance driveway to LPCC, which would result in adding an even longer walk for grocery store customers arriving by public transportation to shop at the LPCC.

According to the 2006 Sacramento Pedestrian Master Plan, the stretch of Freeport Boulevard adjacent to the proposed LPCC is a pedestrian street corridor that has high pedestrian demand, but also high pedestrian deficiencies and high pedestrian improvement need. The DEIR states that new sidewalks will be installed according to City standards along Freeport Boulevard and Wentworth Ave. Please provide details about the proposed design of the street-fronting sidewalks that will be installed. Please ensure that the sidewalks meet or exceed ADA requirements. Please ensure that the new sidewalks are consistent with the intent of the Sacramento Pedestrian Master Plan and we recommend pedestrian improvements at least at the "upgraded" level outlined in the Pedestrian Master Plan. We would also like to see more detail (such as a figure and description) on the conditions of approval regarding the reconfiguration of the traffic light and stop sign at Sheilah/Stacia and Wentworth on both sides of Freeport Boulevard.

The DEIR states that greenhouse gas emissions impacts are less than significant and no mitigation is required. However under Section 4 .5-1, the City should require a re-evaluation of how the project can contribute to city or state efforts to meet AB 32 standards for reduction of greenhouse gas emissions by reducing automobile trips to the LPCC since the project location is served by bus, bike lanes, and is walkable and bikeable from several surrounding neighborhoods. The transportation survey should be used as a baseline to show current customers' transportation modes to the existing store, and then implement ways to increase pedestrian and bike transportation percentage by customers. There are significant improvements to the layout and access to the center that can impact pedestrian and bicycle access in a positive direction. As a specific example, bike access from a northbound direction needs to be addressed, and we recommend including a protected bicycle left turn lane either to Wentworth or to the Freeport Boulevard entrance driveway.

Preservation of existing Raley's neon sign

The Aesthetics chapter and Cultural Resources chapter mention that Notice of Preparation comments were received recommending that the vintage neon signage at the current Raley's location be relocated to the proposed LPCC to preserve the history and character of Freeport Boulevard and the adjacent communities. However, no details were provided to address if preservation of the sign will actually occur. The HPNA requests that the disposition of the historic neon sign be specifically addressed.

Need for Consideration of Other Alternatives

The Alternatives Analysis briefly discussed then dismissed one alternative site layout and considered only one other alternative site layout in more detail (Alternative 3). In Alternative 3, the grocery store is sited

adjacent to and parallel with Freeport Boulevard, with the parking lot and smaller buildings behind the grocery store and out of view from Freeport Boulevard. In considering Alternative 3, the DEIR inaccurately generalizes that “the retail environment on Freeport Boulevard favors a more suburban design with parking in front of the buildings.” Freeport Boulevard actually currently has many retail buildings that do not have parking in front of buildings, such as Chase, Bank of America, Marie Callender’s, Taco Bell, King of Curls, Oto’s, and Roberta’s. Alternative 3 was found to meet most of the project objectives and most impacts would be similar to or less than those of the proposed project. The only impacts that would be more significant than the proposed project are the lack of fire access to the tenant building and more limited opportunities for implementing southbound right turn and northbound left turn to the project site. The proposed project sites the grocery store at the far west end of the project site while Alternative 3 sites it at the eastern edge of the project site, but there are other site layouts not considered.

The HPNA feels that the alternative that sites the grocery store along the north boundary of the project site (as we recommend in comments above, see attached Figure 1), adjacent to and perpendicular to Freeport Boulevard, was not fully vetted, and therefore, we request a more detailed consideration of such an alternative. Since Alternative 3 was found to have similar or less impacts than the proposed project, it is likely that the northern boundary alternative siting would have similar impacts with similar opportunities for mitigation. As stated in comments above, the northern boundary alternative would also be more consistent with the 2035 General Plan, will likely promote greater public safety, discourage crime, facilitate pedestrian and bicycle access, and allow more traffic mitigation options.

While the HPNA generally supports the LPCC project and greatly appreciates Raley's' commitment to the communities it serves, we remain less than enthusiastic with the current proposed project as considered in the DEIR. Thank you once again for the opportunity to comment. We look forward to working with all parties involved on this exciting project.

Sincerely,

Board of Directors
Hollywood Park Neighborhood Association

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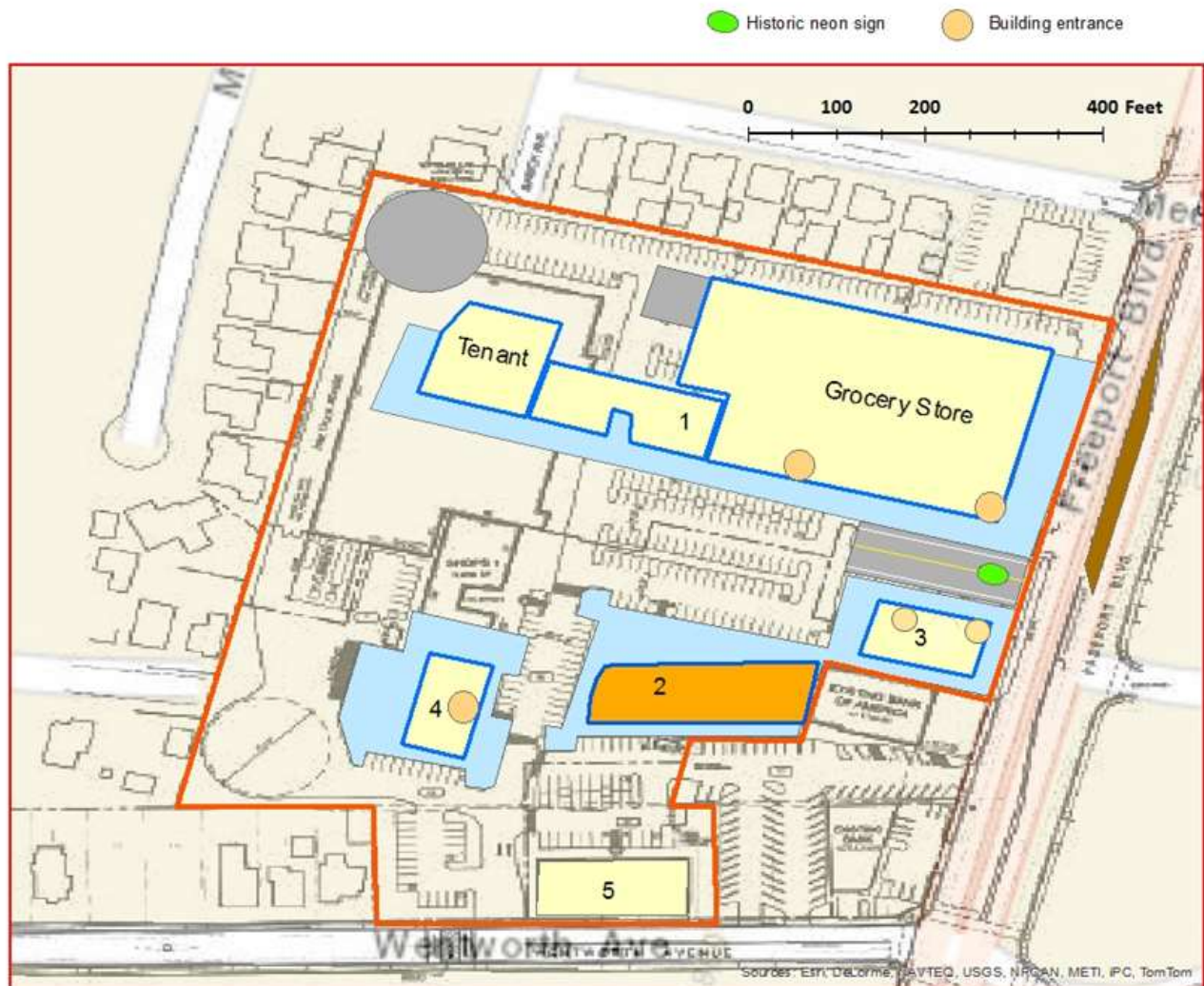


Figure 1: Alternative site layout of project buildings recommended by HPNA.