



ECOS
ENVIRONMENTAL
♦ COUNCIL ♦
OF SACRAMENTO



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December 9, 2019

Teresa Haenggi
thaenggi@cityofsacramento.org

Re: Comments on the Arco Arena Reuse PUD

Dear Ms. Haenggi:

ECOS/Habitat2020 and Sacramento Heron and Egret Rescue offer the following comments regarding the Arco Arena Reuse Planned Unit Development (PUD)

ECOS, a 501c3 organization, and Habitat 2020, the Conservation Committee of ECOS, are partner coalitions dedicated to protecting the natural resources of the greater Sacramento region. Among the many ECOS-Habitat 2020 member organizations are: 350 Sacramento, Breathe California of Sacramento-Emigrant Trails, International Dark-Sky Association, Sierra Club Sacramento Group, Sacramento Audubon Society, California Native Plant Society, Friends of the Swainson's Hawk, Save the American River Association, Save Our Sandhill Cranes, Sierra Club Sacramento Group, Friends of Stone Lakes National Wildlife Refuge, Sacramento Heron and Rescue and the Sacramento Area Creeks Council. ECOS is a signatory of the Water Forum Agreement, and a member of the Water Forum Environmental Caucus.

Sacramento Heron and Egret Rescue is an all-volunteer wild bird rescue team focused on helping injured and orphaned baby herons and egrets (and other wild birds) born in urban environments.

The ideas presented in the PUD completely ignore that there is a fully functioning aquatic resource (the Sleep Train Arena pond) in the Plan area that is currently providing habitat and nesting opportunities for hundreds of waterfowl. The PUD presents a completely people oriented urban landscape without any consideration for the local species that we share the region with. This paradigm ignores the appeal that such an aquatic resource would have for the new residents of the project area. It also demonstrates a lack of creativity because it is not even considered for use as part of the drainage basins that the Plan area will need to include. The grassy-sloped drainage basin depicted in the PUD, with anticipated residents recreating there, presents a vastly inferior option to a biologically dynamic pond supporting a large healthy nesting population of herons, egrets, cormorants, and other local avian species.

If this pond is eliminated, the over 1,000 herons and egrets that nest from April to August each year would very likely move to the surrounding neighborhoods to roost and nest, creating issues for residents and businesses. This would also result in hundreds of injured baby birds each year that would greatly strain local wildlife rescues, which are doing the work that our local shelters would otherwise be dealing with. The pond would provide the area with a nature viewing experience that would serve as a recreational and educational opportunity. It would allow residents access to nearby nature, which has been shown by research to have mental health benefits.

The Natomas Basin Habitat Conservation Plan's mandate is to implement a conservation strategy that would provide regional protection for listed species that would be impacted by development in the Natomas Basin. Though there is at least one Swainson's hawk nesting in the Plan area, this pond is not an aquatic resource that supports listed species. But, that in no way means that it is an insignificant resource that can be filled in

with no thought given to its highest use in the Plan area. Every new project that gets approved by the City of Sacramento needs to enhance the region. The first step in this process, by definition, would be saving those resources that enhance the region. Destroying the Sleep Train Arena pond, and installing inferior features that can provide just one of the services that the original resource contributed, is the opposite of enhancement.

ECOS/Habitat 2020 and Sacramento Heron and Egret Rescue strongly recommend that the City and the project proponents give serious consideration to a project design that incorporates the habitat value and community benefit of the Sleep Train Arena Pond into a drainage design that would enhance the overall value of the development. We would be happy to meet with city staff and the applicants to more fully discuss our concerns.

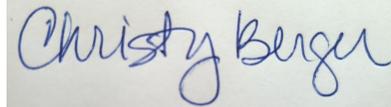
Egretfully yours,



Ralph Proper
President, ECOS



Rob Burness
Co-chairman, Habitat 2020



Christy Berger
Co-founder Sacramento Heron & Egret Rescue

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