



INLAND EMPIRE BIKING ALLIANCE

Comment Letter #2

18 October 2020

Luis Lopez
City of Coachella
1515 6th Street
Coachella, Ca 92236

Re: Bejarano Cannabis Cultivation Project (SCH #2020090375) ISMND

Dear Luis,

I am writing on behalf of the Inland Empire Biking Alliance in response to the ISMND that has been prepared for the Bejarano Cannabis Cultivation Project (“Project”) which has been proposed there in the city. After reviewing the documents, we would like to provide the following comments to ensure that the Project will enhance, not degrade the experience of bicyclists and other non-motorized users.

2-1

The main concern is the impact this project would have on the planned CV Link project that is to be built along the Whitewater River channel which runs along the eastern edge of the Project location. Per Map Page 61 of the *Conceptual Master Plan Volume 3: Preliminary Plan Set* for the CV Link¹, the segment of the CV Link which would pass through the area is envisioned to be on the western bank of the Whitewater River, which presents a potential conflict with this Project. Yet, section XVII a. of the Project’s ISMND makes no mention of this potential conflict and how it would be mitigated.

2-2

We would hope that such an oversight will be corrected. Ideally, the CV Link should be treated as any other infrastructure is and the Project applicant can construct the unfinished portion along the Project frontage to CVAG specifications. However, at the very least, the site design should be reviewed to ensure that it does not preclude (or require substantial and expensive modifications to accomplish) the construction of the CV Link at a later date. Anything less could and should be considered a Significant Impact as it would be in direct conflict with the plans.

2-3

Additionally, the ISMND mentions that the City of Coachella’s General Plan “does not identify heavy industrial and agricultural areas as the type in which alternative modes of transportation are necessary,” but this is a fundamentally flawed premise. In general, the potential destinations for bicyclists are basically everywhere that people would want to go via car, including to agricultural or industrial areas. Given that this site is less than two miles from residential areas of the City, it is entirely possible that both visitors and especially employees would find themselves needing to arrive to the Project location by bicycle at some point in the future. Bicycling is also well suited for helping meet GHG and VMT reduction goals.

¹ Coachella Valley Association of Governments (2017). Certified Environmental Impact Report for the CV-Link Multimodal Transportation Project: Appendix B: Route Map Book. Palm Desert, CA.



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2-4 Although the ISMND mentions that it is assumed that various intersection upgrades will benefit bicyclists, we have some concerns about the ultimate configuration of Harrison St. According to guidelines from Caltrans², the FHWA³, and NACTO⁴, Harrison St. has a volume of traffic which warrants the use of a separated facility be used for both in the present and as forecasted in the future. While we do not expect that the City would rip up and rebuild everything to meet the guidelines all at once, we would hope that at least new construction, such as will be done to complete the Project, would use designs which reflect that reality.

2-5 Finally, no mention at all was made of bicycle parking standards or accommodations, but those are an integral part of bicyclist access to a location. We would like to see that bike parking be provided and that it is of high quality. We recommend that the City use the highly regarded standards developed by the Association of Pedestrian and Bicycle Professionals contained in their *Essentials of Bike Parking: Selecting and Installing Bike Parking that Works* publication which is available for free on their website at <<https://www.apbp.org/Publications>>. And although the APBP guidelines do not specify a number, we would suggest that a minimum of at least 10% of the number of spaces provided for cars be provided for bike parking, potentially split into short-term and long-term orientation.

2-6 In summary, we are concerned that the potential impacts of this Project to the CV Link have not been adequately documented and would like to ensure that other bike improvements in the area can also be achieved in the same manner as other improvements. This takes full advantage of the opportunity of construction to ensure that the infrastructure being built is up to the standards of today and will not require the use of grant funds at some point in the future to rectify problems that could be just not built in from the beginning. If there are any questions regarding these comments or other concerns which they might raise, please do not hesitate to reach out for clarification.

Sincerely,

Marven E. Norman, Executive Director

² Flournoy, M. (2020). Contextual Guidance for the Selection of Bicycle Facilities. California Department of Transportation. Retrieved on 18 October 2020 from < <https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/office-of-smart-mobility-and-climate-change/planning-contextual-guidance-memo-03-11-20-a11y.pdf>>.

³ Schultheiss, B., D. Goodman, L. Blackburn, A. Wood, D. Reed, & M. Elbech (2019). Bikeway Selection Guide. Federal Highway Administration: Washington, DC.

⁴ National Association of City Transportation Officials (2017). Designing for All Ages & Abilities: Contextual Guidance for High-Comfort Bicycle Facilities. NACTO.