



ECOS

ENVIRONMENTAL  
♦ COUNCIL ♦  
OF SACRAMENTO

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September 13, 2007

Joyce Horizumi, Environmental Coordinator  
Sacramento County Department of Environmental Review and Assessment  
827 7<sup>th</sup> Street, Room 220  
Sacramento, CA 95814

Re: ECOS Comments on County of Sacramento General Plan Update

Dear Ms. Horizumi,

ECOS submits the following comments on the Sacramento County General Plan Update Land Use and Circulation Elements.

## I. LAND USE ELEMENT

### A. Strategy I: Logical Progression of Urban Development

The County is to be commended for many of the Strategies, Goals and Objectives, and Policies outlined in the Land Use Element. In particular, ECOS is heartened by the County's emphasis on a *logical progression of urban development* and on prioritizing already urbanized areas for future *growth accommodation* and *growth management*. That said, ECOS remains concerned about the commitment and ability of the County to implement these strategies in ways that are consistent with the majority public position on growth based on input gathered throughout the planning process of the last year.

Protection of the Urban Services Boundary (USB) for the life of this planning cycle is crucial; ECOS congratulates the County for resisting tremendous pressure to expand the USB. ECOS is deeply troubled, however, by County plans to dramatically expand the Urban Policy Area (UPA) to include thousands of acres of new growth areas (i.e., west of Watt Avenue, in the Easton Planning Area, the Jackson Highway Corridor, and the Grant Line East Area) with capacity to accommodate one-third of projected population growth over the next 20 years. [Draft Land Use Element (May 30, 2007), p. 39-43.]

Although the County identifies the objective for new growth areas as including a "mix of housing, jobs and retail development configured in a compact and transit supportive manner," a rather cursory review of projected acreage and densities gives one pause and calls into question

the stated objective. One-third of projected population growth equals approximately 33,000 residents. The new growth areas included in the expanded UPA total more than 15,000 acres. This means that the County is prepared to accept very low density development (approximately 2 du/acre) in areas for which the stated objective is urban, mixed use development. This striking disconnect between the County's stated goals and projected targets must be explained. The County does itself and all residents a tremendous disservice by laying out growth objectives that simply will not be possible under projected development target densities.

## B. Strategy II: Growth Accommodation

The majority opinion in Sacramento County is clear: to the fullest extent possible, population growth should be accommodated in already urbanized areas. That means that the County must prioritize and maximize planning for infill, redevelopment and revitalization, including efforts along commercial corridors, at the highest feasible densities. With the language of its draft Land Use Policies #4-8 and #12 (LU 4-8, 12), the County acknowledges the importance of these efforts. A rather cursory examination of the acreages and target holding capacities, however, reveals an underlying and deeply troubling set of assumptions that essentially guarantee low density development for the foreseeable future.

In its introduction to "Strategy II: Growth Accommodation," referring to development opportunities presented by vacant and underutilized parcels in existing urbanized areas within the UPA, the County states: "Because development in these areas cannot accommodate the entire population increase and associated development projected to occur during the planning period, the Plan also designates new urban growth areas to accommodate a portion of anticipated future growth." [Draft Land Use Element (May 30, 2007), p. 25.] This is an unfounded and troubling statement that directly undercuts majority public opinion and the County's own stated Land Use Policy priorities.

### 1. *Build-Out of Infill Sites*

Using the target holding capacity acreage figures on pages 28 and 35, one quickly finds that the potential for growth accommodation in already urbanized areas far exceeds the holding capacity targets estimated by the County. On page 28, the County notes that there are 3,142 acres of vacant or underutilized land within the UPA (not including developable acreage along commercial corridors identified for growth accommodation). Yet the County has targeted holding capacity for these areas at a mere 10,000 – 18,000 dwelling units, between approximately 3 and 6 dwelling units per acre (du/acre). This kind of relatively low-density development calls into question the County's stated goal of focusing most growth in existing urbanized areas as these targets all but necessitate the near-term planning of new growth areas.

Acknowledging that underutilized and vacant parcels present a mix of settings and development opportunities, one can nevertheless envision successful build-out scenarios for many of these parcels at much higher densities, without any upzoning. For example, at 15 du/acre (averaged out over the entire 3,142 acres), holding capacity rises to more than 47,000 dwelling units. ECOS understands that 15 du/acre is infeasible for many specific infill sites. It will therefore be imperative to maximize densities wherever feasible to achieve the highest possible average du/acre density across the entire 3,142 acres of vacant or underutilized land in

Sacramento County. ECOS urges the County to develop a target average density for this acreage, based on existing zoning and opportunities for upzoning, wherever feasible, particularly in areas that are not already developed/established residential neighborhoods.

## *2. Commercial Corridor Planning*

A similar analysis can be done with respect to commercial corridor development opportunities. The County currently projects development opportunities along 14 identified commercial corridors offering approximately 19,000 dwelling units over 1,454 acres. As with the build out of infill sites analysis above, although the language of the stated objective is glowingly optimistic, the holding capacity and acreage numbers reveal a fundamental disconnect between the County's leadership and the clear will of County residents. At 15 du/acre, commercial corridor revitalization would produce nearly 22,000 dwelling units. At a more appropriate 20 du/acre, these commercial corridors would provide nearly 30,000 dwelling units and, in the process, also become vibrant, healthy, livable urban neighborhoods. Many stretches along commercial corridors may be ripe for densities higher than 20 du/acre. Again, wherever possible, densities should be maximized.

Combining the easily achievable 40,000 to 50,000 new dwelling units through infill with at least 30,000 new dwelling units along commercial corridors at an average overall density of 20 du/acre would result in 70,000 to 80,000 new dwelling units (at the low end), almost the entire projected additional dwelling units needed over the life of this General Plan. Further, the County must understand that this is no radical vision of extreme urban dense living; an average of 15-20 du/acre would be superior in every way to the County's current projections in allowing for the natural evolution of real urban neighborhoods. Given the challenges and risks posed by flooding, the aging of our population, loss of farmland and habitat, air quality, gas prices, and global warming, how can the County justify any approach that fails to maximize development opportunities in existing urbanized areas?

Respecting the clear and overwhelming expression of public support for an environmentally sustainable and community reinvestment-oriented growth strategy as the core of the Land Use Element requires that the County commit to a new approach to planning and growth. Maximizing growth accommodation and management through infill, redevelopment and revitalization of already urbanized areas and commercial corridors will require difficult and ongoing public outreach and engagement, tough decisions, and bold leadership that lays out the harsh consequences if we fail to change our growth patterns. A successful and sustainable future for Sacramento County will require adoption of and steadfast commitment to higher holding capacity figures than are currently projected for already urbanized areas and commercial corridors. Mere words of commitment to the principles and objectives of growth management will be grossly insufficient.

## *3. New Growth Areas*

As stated above, ECOS believes that the County is pursuing a dangerous and counterproductive strategy by planning for many thousands of acres of new growth within an expanded UPA (including the West of Watt area, the Easton Planning area, the Jackson Highway Corridor, and the Grant Line East area). ECOS continues to urge the County to prioritize development at the

highest feasible densities for already urbanized areas and to only consider development proposals in new growth areas after maximizing approved development densities for infill and redevelopment sites. The only way this will happen is if the County makes a firm commitment to achieving higher densities (e.g., 15 – 20 du/acre) for approved developments in already urbanized areas before the County considers specific development proposals for new areas.

### C. *Strategy III: Growth Management and Design*

The relationship between this third overall strategy and the previous two is revealing. Nearly all of the land use policies outlined in *Strategy III* must be pursued in order to have any chance of successful implementation of *Strategies I* and *II*. But even a firm commitment over the life of this General Plan to the policies of *Strategy III* will be insufficient for achieving the reorientation of land use patterns that will be necessary if the County is serious about and committed to all of the laudable goals and objectives outlined in *Strategies I* and *II*. As noted repeatedly above, there is a fundamental disconnect between the County's stated goals and the specific acreage and holding capacity projections the County has made with regard to long term planning.

The section of the Draft Land Use Element outlining *Strategy III* contains page after page of sensible, optimistic objectives and policies. ECOS supports nearly all of these goals. But other than the matrix of transit-oriented and supportive densities and walkable distances on page 57 related to LU 34, one is hard pressed to find any firm County commitments to maximum or even minimum target densities or holding capacities in areas that will be developed over the life of this Plan. This is simply inexcusable. The County will be unable to achieve true neighborhood revitalization and increased densities and enhanced livability of existing urbanized areas in the absence of detailed density targets and priority area timelines linked to the specific objectives and policies in *Strategies I* and *II*.

### C. Conclusion to Land Use Comments

The residents of Sacramento County deserve more — much more — than lip service to smart growth principles. There is only one way that Sacramento County will be able to grow sustainably in the future: inward. The vast majority of County residents understand this basic fact and thus support planning efforts that would focus most growth in already urbanized areas. In its present form, much of the language of the Land Use Element reads like a smart growth dream manual, promising a new approach to planning that respects the will of the people. But the few specific numbers outlined in the Land Use Element appear to reveal an underlying plan that is essentially business as usual.

ECOS strongly urges the County to adopt higher specific target densities and holding capacities, in the range of 15-25 du/acre average, for all potential infill, revitalization and redevelopment sites in already urbanized areas. ECOS also urges the County to commit to minimum target development approvals in these areas (e.g., approved projects for 66% or 75% of total developable acreage) before even considering development proposals for new growth areas. Inclusion of the above-referenced policy language will go a long way toward making this General Plan a strong and influential document over the coming years.

## II. CIRCULATION ELEMENT

ECOS commends the County for making certain additions and modifications to the Circulation Element between the November iteration and the May 30 Final Draft. There are, however, certain crucial changes still needed for this element to effectively address Sacramento County transportation planning issues over the life of this General Plan.

### A. Roadway Functional Classification System

This section is essentially framed around one form of road use: single-passenger vehicular transportation. The County writes about balancing “mobility” and “access” — but this is just a trade-off for vehicular transportation because providing enhanced mobility for vehicles almost always restricts both access *and* mobility for pedestrians, cyclists and people using other modes of transportation (e.g., scooters, wheelchairs, etc.). This is because people who are walking or riding a bike or using a wheelchair are not safe and do not want to be forced to travel directly alongside high-speed traffic. The County should rework the section so that it addresses this basic tension and acknowledges that enhancing mobility and access for all users is a goal of County roadways and that trade-offs must be made in order to develop a roadway system that works well for all users.

Additionally, this section would be stronger if it acknowledged the societal and environmental impacts of large roadways. These include: growth-inducing impacts; increased water runoff and water management challenges; intensified urban heat island effect; reduced access and safety for bicyclists, pedestrians, and persons with disabilities; increased risk of fatal crashes; increased noise; and exacerbated air quality problems and greenhouse gas emissions. Perhaps the most important drawback is that large roads strongly discourage pedestrian and bicycle use.

ECOS suggests addition of the following language for the first paragraph:

*“Roadways serve two necessary but often conflicting functions: mobility and access. A functional classification system provides for specialization in meeting the appropriate access and mobility requirements of development permitted under the Land Use Element while maintaining the intent and function of the roadway system. Local streets emphasize access for all modes of transportation. Freeways, thoroughfares and arterials emphasize high mobility for automobile through-traffic; this limits access and reduces safety and comfort for pedestrians, cyclists and others not using automobiles. Collectors attempt to achieve a balance between both functions.”*

#### 1. Freeways, Thoroughfares, Arterials

The ECOS 50-Year Transportation Vision (see [www.ecosacramento.net/Vision.htm](http://www.ecosacramento.net/Vision.htm) for all relevant documents) lays out a model regional circulation system with absolutely no road widenings beyond 4 lanes — on any roadway types, including freeways. ECOS urges Sacramento County to implement this policy in the Circulation Element. When widened beyond four lanes, roads of all classes are incompatible with mixed-use development and hinder the development of walkable/bikeable neighborhoods. Widening roads also directly increases vehicle miles traveled (VMT) by inducing additional traffic.

ECOS urges the County to consider reclassifying thoroughfares as arterials and then limiting these roadways to no more than four lanes wherever possible. The following additional language should be added to the classification for *thoroughfares* and *arterials*:

*“Class II bicycle facilities shall be provided. Bikeways along roads with speed limits over 35 mph shall be at least 6 feet wide. Bikeways along other roads shall be at least 5 feet wide.”*

## 2. Collectors

The text describing bikeways for collectors should be modified to read:

*“Class II or III bicycle facilities shall be provided. Bikeways along roads with speed limits over 35 mph shall be at least 6 feet wide. Bikeways along other roads shall be at least 5 feet wide.”*

## 3. Urban Interchanges and Grade Separations

Urban interchanges and grade separations are extremely detrimental to neighborhoods and are incompatible with walking and cycling. To the fullest extent possible, they should not be permitted or planned for.

## 4. Bikeways

The existing language describing designated bikeways is ambiguous and does not require that bikeways be included on major roadways. Bikeways should be required on all roadways except local streets. The existing language describing bikeways allowed for each road type includes Class I bikeways. Class I bikeways are primarily for recreational use and create safety hazards when they cross major roadways using a pedestrian crossing at a roadway intersection. Class I bikeways should therefore be provided only *in addition* to Class II and III facilities and should use only mid-block signalized crossings (i.e., they should not meet major roadways at intersections). Where existing Class I bikeways use crosswalks, the bike path crossing should be set back from the intersection by at least fifty feet (50'), with appropriate signage and signalization giving an immediate crossing signal to cyclists (i.e., the time delay cuts in *after* cyclists cross, not before).

## B. Congestion

While congestion is clearly a frustrating phenomenon, it is to a great degree an inevitable byproduct of urbanization and an indicator that transportation facilities are being used at maximum efficiency. Freedom from congestion is simply unrealistic in an urban region. The goal should be to aggressively increase access to and use of all non-vehicular transportation options (walking, biking and transit). The Circulation and Land Use Elements can only be mutually reinforcing if the County commits to land use patterns that minimize the need for vehicular trips and offsets increases in traffic volume with a new land use pattern that minimizes single-passenger driving. Major changes in land use must be linked with provision of a much more robust multi-modal circulation system.

### C. Level of Service (LOS)

Proposed roadway modifications should include multiple measures of LOS to ensure that the interests of car drivers are not met at the expense of everyone else who uses the roadways. There is something inherently wrong with a classification system that is based entirely on the usage of only one class of users. Roadways obviously do much more than allow for people to drive their cars. Yet that is the only metric used in determining level of service. The County should consider substantial modifications to its LOS classification system that incorporate all roadway users.

### D. Circulation Element Policies

ECOS proposes the following additions and amendments to the text of the policy section. Note that where we propose an amendment to the text, the existing goal name and/or policy number is used. Where we propose an additional goal or policy, we indicate where it should be included in the list (e.g., "19.1", "19.2," etc.) or we use the following nomenclature: "N+1," "N+2," etc.

#### Mobility

##### Amend Policies:

- CI-0. Plan and construct transportation facilities that support the goals of the General Plan, including increased density, shorter trip distances, mixed-use and transit-oriented development, and the encouragement of alternative transportation.
- CI-3. Maintain and rehabilitate the circulation system to maximize safety, access and cost efficiency for all classes of roadway users.

#### Roadways

**AMEND GOAL:** Provide a balanced and integrated roadway system that supports the Agricultural, Air Quality, Conservation, Economic Development, Human Services, Land Use and Open Space Elements of the General Plan and allows the movement of people and goods in a safe and efficient manner.

##### Amend Policies:

- CI-5. Land development projects shall be required to assist with mitigation of their traffic and parking impacts through non-car-oriented design, minimized parking facilities, and/or a fee to be dedicated to operation and maintenance of local transit services.
- CI-9. To improve mobility and access in the most congested transportation corridors, the County will initiate processes to evaluate and adopt appropriate transportation measures of the Mobility Strategies for County Corridors. These measures shall not include the addition of lanes or grade-separated facilities.
- CI-N+1. Roadways shall not be designed to be wider than necessary to accommodate the maximum traffic volumes anticipated by the Land Use element of the General Plan. No roadways should be designed to be wider than four (4) lanes.

- CI-N+2 When roads with more than two lanes are planned, the negative impacts on walking and bicycling especially for vulnerable groups such as children, seniors and the disabled must be considered and mitigated.

### *Bicycle and Pedestrian Facilities*

**AMEND GOAL:** Provide safe, comfortable, continuous, efficient, integrated, and accessible bicycle and pedestrian systems that encourage the use of the bicycles and walking as viable transportation modes and as a form of recreation and exercise.

#### **Amend Policies:**

- CI-20.1 Provide on-street bicycle facilities (class II or III bikeways) on all roadways except neighborhood streets, with class I bikeways and multi-use paths provided as an additional amenity when appropriate.
- CI-20.2 Provide sidewalks on all streets
- CI-21.1 Construct and maintain bikeways and multi-use trails to minimize conflicts between bicyclists, pedestrians, and motorists (i.e., merges, diverges, and bicycle crossings at intersections).
- CI-N+1 Provide for bikeways and multi-use trails that have direct, continuous linkages between destinations and have amenities to make travel comfortable, including benches, shade trees, directional signage, and drinking fountains.

### *Add Section on Parking*

Providing excessive vehicle parking is not a cost-effective use of urban land. Parking facilities consume large amounts of valuable land, thereby depressing urban property values. Excessive provision of parking facilities also creates and exacerbates numerous environmental and public health and safety problems, including but not limited to: neighborhood deterioration, water pollution, car-oriented land use patterns, excessive urban heat, and light pollution.

**ADD GOAL:** To support mixed use development and alternative transportation, and to reduce development costs by reducing the amount of vehicle parking provided around commercial developments, especially in commercial corridors.

#### **Add Policies:**

- CI-N+1 Develop parking construction standards that minimize the negative effects of automobile parking, based on the Sacramento County General Plan *Transit-Oriented Development Design Guidelines*.
- CI- N+2 Reduce the amount of automobile parking provided in all areas of the County through the use of maximum parking quotas, mixed-use developments and shared parking space programs.
- CI- N+3 Require new residential developments to allow on-street parking.

- CI-N+4 Achieve higher parking density by enforcing standards for the maximum allowed length of parking spaces
- CI- N+5 Establish and implement bicycle parking standards, including standards for the design of bicycle racks.

Add Section on Transportation and Land Use Coordination

The Circulation Element of the General Plan should be subordinate to and designed to reinforce the Land Use Element.

**ADD GOAL: The Circulation Element should support and reinforce the Land Use Element.**

**Add Policies:**

- CI- N+1 Even though they may improve mobility for a certain class or classes of users, roadways that undermine Land Use Element goals or policies by facilitating more frequent and/or longer road trips or by removing incentives for development of more localized services and mixed use developments should not be approved.

Add Implementation Measures:

- A. Use the *Transit-Oriented Development Design Guidelines* when development is proposed along transportation corridors.
- B. Collaborate with the Planning Department in creating circulation components of community plans for transportation corridors based on the *Transit-Oriented Development Design Guidelines*, that divert arterial traffic from Transit Oriented Development centers, provide a comprehensive network of multiple and direct pedestrian and bicycle routes between destinations, and enhance multi-modal transportation.
- C. Collaborate with the Planning Department in developing circulation components of specific plans that divert arterial traffic from areas of high pedestrian connectivity, provide a comprehensive network of multiple and direct pedestrian and bicycle routes between destinations, and enhance multi-modal transportation.
- D. Ensure that all roadway construction, especially construction associated with collector or local roadways, prioritizes pedestrian and bicycle connectivity, using the *Transit-Oriented Development Design Guidelines*.
- E. Collaborate with transit providers to ensure accessible, safe, frequent and convenient transit service and improved transit stop design along all transportation corridors, and to all Transit Oriented Development.
- F. Transit facilities will at minimum feature pedestrian shelter, convenient passenger loading zones, and multi-modal features such as secure bicycle storage, especially in Transit Oriented Development and along transportation corridors.
- G. Along transportation corridors, use developer fees, development exactions and improvement districts to contribute to improved transit, pedestrian and bicycle facilities, and facilitate non-vehicular access between residential areas, commercial areas, employment centers, and transit facilities.

### Add Section on Integration of Local Streets

Many subdivisions and commercial developments in the County have no through streets and a small number of entry and exit points, making it difficult for buses, shuttles, pedestrians and cyclists to get from one place to another efficiently, or while avoiding arterial streets.

**ADD GOAL:** Ensure that all new developments allow through travel for all members of the public, to improve the safety and convenience of alternative transportation and to reduce trip distances.

#### **Add Policies:**

- CI-N+1 All new developments shall provide seamless connections to all surrounding radial streets. Access to the development shall be allowed for all members of the public.
- CI-N+2 All new developments shall provide for direct and convenient travel across the development.
- CI-N+3 All new residential developments shall provide at least one access point per 200 yards of perimeter. Multiple access lanes shall not count as multiple access points. Access points shall align with surrounding radial streets.
- CI-N+4 The County shall consider adding access points and through connections in existing developments where this is cost-effective as a means of enhancing the pedestrian and bicycle network, or of reducing peak hour congestion.

### Add Section on Relationship Between Accessibility and Mobility

Transportation systems that give very high priority to rapid mobility based primarily on personal automobile travel make it very difficult for people who do not drive to move around their communities. A large portion of young, elderly, disabled and low-income populations have limited or no access to automobile mobility. Increasingly, some people choose alternative modes for environmental or health reasons.

For almost a century, automobile travel, in our region as elsewhere, has been given very high priority over other modes of mobility. This has created a gross imbalance between the modes of mobility. The result is that those who walk, bike, ride transit or use some means other than a car to get around are burdened with tremendous difficulty and inconvenience when traveling.

Even the more elderly members of our region who are able to drive themselves suffer heavily from this imbalanced transportation system. Per mile of automobile travel, those drivers over 70 years of age are ten times more likely than younger people to suffer a fatality or a serious injury due to a traffic collision. Due to this higher risk of physical injury, seniors, even when they are able to drive competently, tend to drive a lot less than younger drivers. This in turn results in seniors being much more limited in their access to needed services, to social contact, and to opportunities to participate in and contribute to the broader life of our communities.

In recent years, the County of Sacramento has taken some crucial first steps to address this transportation injustice. However, unless alternate modes of mobility are given a much higher

priority relative to individual automobile mobility, those who do not drive cars will continue to experience an increasingly unjust, problematic and dangerous situation. Sacramento County should redouble its efforts to develop and build fully effective alternative transportation systems for people who do not drive.

**ADD GOAL:** Sacramento County shall substantially increase the portion of its transportation resources allocated to programs and projects intended to improve the mobility of individuals whose access to automobile transportation is limited by age, illness, income, desire, or disability.

**Add Policies:**

CI-N+1 Ensure full and equal mobility for all Sacramento County residents.

Add Implementation Measures:

- A. Develop and implement best industry practices for roadway, street and sidewalk design for improved safety and accessibility for all individuals, with particular focus on the needs of those who can not or choose not to drive their own private automobiles.
- B. Increase support for Regional Transit and Paratransit in their efforts to provide transit access to young people, persons with disabilities, and those seniors age 70 or older.
- C. Utilize land-use density and design concepts to improve non-automobile access for all individuals as outlined in this Element, the Land Use Element, and the Transit-Oriented Development Design Guidelines.

**E. Conclusion to Circulation Comments**

The circulation system is the skeleton around which all of the residents and businesses of Sacramento County construct their lives. The approach of previous General Plans — to reduce congestion by building ever-larger roadways — has not worked and must be discontinued.

Unless and until Sacramento County commits to land use and circulation development patterns framed around traditional urban densities, mixed uses, neighborhood grids and complete streets, all of the otherwise laudatory goals in the General Plan will be unachievable. ECOS looks forward to seeing the next iteration of these important documents.

This concludes our comments on the County of Sacramento General Plan Land Use and Circulation Elements. Thank you for the opportunity to comment. Please do not hesitate to contact us with any questions.

Sincerely,



Graham Brownstein  
Executive Director, ECOS