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July 30, 2008

Tom Pace, Long-Range Planning Manager
City of Sacramento Planning Department
New City Hall
915 I Street, 3rd Floor
Sacramento, CA 95814

Re: ECOS Comments on City of Sacramento General Plan Update

Dear Mr. Pace,

ECOS submits the following comments on the City of Sacramento General Plan Update.

In general, ECOS is supportive of the policies in the Draft 2030 General Plan (hereinafter “GP”). The Plan document is comprehensive and reflective of the new directions for the City encompassed in the SACOG Blueprint, the City’s Smart Growth Principles, and the City’s Sustainability Master Plan. ECOS commends the substantial efforts of City Planning staff in working to ensure that sustainability and other environmental concerns are addressed throughout the plan elements.

We do have some concerns regarding specific policies and priorities — particularly in the Land Use, Mobility, Environmental Resources, Housing, and Public Health and Human Resources Elements. Given the myriad challenges this City will face in coming years, this General Plan update is of singular importance. We need to take every possible opportunity to maximize sustainability and the efficient allocation of limited resources. ECOS offers the following comments in the hope of helping the City fine tune the GP in ways that will enhance the City’s chances of actually evolving into America’s most livable city.

I. LAND USE

LU 1.1.2

Population growth in the city should be related to its relationship to support of sustainability in the whole Sacramento region.

LU 1.1.6

Why would the City expressly permit lower-than-minimum densities in the GP? This simply makes no sense. ECOS strongly suggests that this should only be done on a case-by-case variance basis.

LU 1.1.7

The priority should be on revising zoning ordinances so that they **do** conform to the GP as soon as possible.

Illustration LU-1

There is too much allowance for growth on the periphery and too little focus on growth in the urban core and other more central areas. Sustainability demands maximal growth centrally and minimal growth peripherally. Priority must be given to infill development.

LU 1.1.9

We are not pleased with the use of the word “balance,” particularly without more clarification. The household mix is changing very rapidly. The city — not the marketplace — should be in the position of determining the balance, which has too often been focused on short-term returns rather than on long-term investment in existing neighborhoods. More than 80% of the increase in housing demand will be for non-traditional households (that is, households different from the mom/dad/children model). The GP needs to reflect — and plan for — this reality.

LU 2.7.5

This policy should be keyed into and discussed in the Public Safety Element due to the documented health issues associated with air quality for those living within 500 feet of freeways.

LU 2.8.4

We are very supportive of this policy as it attempts to address the issue of environmental justice.

Illustration LU-3

"Neighborhood centers" at the margins should have their justification clearly defined so that they will encourage appropriate growth in the county and deal with the issue of how to extend equitable services to entire neighborhoods in a manner that does not strain overall city services or the city's ability to accomplish general plan goals.

LU 7

The title suggests that the plan seeks to enhance Sacramento as the major employment center in the region but the diagram focuses only on proposed new employment centers and leaves out the economic engine of downtown.

LU 8.1.14

We agree with the policy but maintain that Greenbriar in its present form does not meet this requirement from either a livability or an environmental analysis.

In addition to the above comments on specific policies, ECOS recommends that design review be done on a citywide basis. Citywide design review for all projects would provide the City with a tool for better managing ministerial projects that could otherwise prevent the City from attaining GP goals.

We also strongly suggest that there needs to be more flexibility in some of the central city areas designated “neighborhood residential” to allow for appropriate infill projects that have a higher density than that proposed by the GP but will work well in the neighborhood.

II. MOBILITY ELEMENT

ECOS commends the City for a number of important and imaginative improvements in GP mobility policies. The Mobility Element describes mobility policies as subsidiary to land-use policies, saying they must “support increased densities and a mix of uses on multi-modal districts.” ECOS believes that the mobility policies in the GP set out realistic ways to support the City’s land use goals by restricting roadway capacities, reducing existing overcapacity in the roadway system, and by supporting alternative modes.

The Mobility Element also states that the transportation network must “conserve energy resources, reduce greenhouse gas emissions and air pollution.” We commend the City for identifying that increased roadway capacities create environmental damage and that reducing this damage is a primary social responsibility that needs to be reflected in the GP.

In changing the vehicle LOS requirement from C to D or E, the City is acknowledging the present overcapacity in the roadway network and the consequent damage to the environment and the health and wellbeing of the City’s people. Policies like Complete Streets (and especially the policy to eliminate gaps in Complete Streets) are a good first step toward creating a roadway network that supports rather than hinders the City’s overall planning goals.

In this context, the only statement ECOS disagrees with on the introductory page of the Mobility Element is “do so while preserving auto mobility.” This statement is inconsistent with the policies and goals of the Mobility Element because these goals will necessarily involve a reduction in auto mobility to achieve the desired outcomes in terms of land use, pollution and encouragement of alternative modes. ECOS recommends that this statement simply be removed.

Circulation System

M 1.1.1 (Right-of-Ways)

Change “to best serve future travel demand” to “to best regulate future travel demand.” The rest of the language and policies in the Mobility Element are moving away from the old “predict and provide” approach toward addressing the role of the transportation network in creating and curtailing travel demand.

M 1.2.2 (LOS Standard)

ECOS strongly supports the change of LOS standards from C to D (E in Multi-Modal Districts). We are, however, concerned with the implication that “congestion” is acceptable only if alternatives are in place. We believe that “congestion” is necessary in many instances to move the general plan goals forward and its presence may be necessary to provide for the essential push to alternative movement implementation. Over the longer term we encourage the City to

adopt a new approach to assessing transportation impacts — one that avoids the fundamental contradictions of the vehicular LOS standard.

Contradictions of LOS

LOS is contradictory because it identifies vehicle delay as a negative environmental impact, which creates the necessity to reduce vehicle delay to mitigate the effect. This typically leads to the widening of roadways. The net effect is that using LOS as a standard forces the City to increase pollution to meet the requirements of CEQA, which is the exact opposite of what CEQA is intended to achieve, and the exact opposite of the City's goals.

New Standard for Transportation Impacts

We recommend that, for this iteration of the GP, the City should adopt a new parallel standard for assessing transportation impacts, based perhaps on VMT (vehicle miles traveled) or some other more direct measure of environmental effect. Then, in the next iteration of the GP, the City may be able to drop the LOS approach altogether.

Current Language

In terms of the current policies, we believe that this section contains a lot of residual language from previous GPs, much of which is outdated. For instance, it describes a higher vehicular LOS as being “better” despite the fact that higher vehicular LOS values usually create more challenging conditions for bicyclists and pedestrians. We recommend that the phrase “LOS E or better” should be changed to “LOS A-E”, etc.

ECOS is particularly concerned with the language of M 1.2.2 stating that LOS D or E will be preserved “unless maintaining this LOS would ... conflict with the achievement of other goals.” ECOS would like to remind the City that widening roadways *always* conflicts with the following key goals: promoting mixed-use development, promoting higher densities, promoting alternative modes, and reducing pollution and greenhouse gases.¹ This policy is in specific conflict with the Complete Streets policy in section M 4.2. Therefore, we recommend that the City add language to this section stating: “The need to maintain a vehicular LOS standard should never lead to the construction or expansion of roadways to more than four lanes.”

Diversion of Developer Fees to Alternative Modes

The language of M 1.2.2 a and b seems to indicate that if developments push LOS from D to E (or E to F), this could be acceptable if developers pay for improvements to alternative modes. If so, the fees should be commensurate with what the developer would have paid to improve roadway facilities. If improvements to alternative modes are not feasible within the immediate vicinity of the development, fees should pay for alternative modes improvements elsewhere in the City.

¹ The ECOS 50-Year Transportation Vision (see 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.

LOS for Alternative Modes

ECOS notes that the City has not yet adopted LOS standards for pedestrians or bicyclists. We encourage the City to adopt LOS standards for these modes that, when adopted, can be implemented under the current GP language.

M 1.3.1 (Grid Network)

ECOS supports the use of grid networks for new developments. We commend the city for adopting this policy. We recommend that the policy language drop the word “preferably.”

M 1.3.2 (Private Complete Streets)

We support this policy and would like to see the language strengthened so that developers are required to connect not only to the “existing roadway system” but specifically to *all* existing residential streets and collectors that adjoin their development as well as to all existing bikeways and pedestrian paths. Where no existing residential streets or collectors exist, developers should be required to provide frequent access to surrounding arterials from within the development.

M 1.3.3 (Eliminate Gaps)

We support this policy but note that a new multi-modal crossing of the American River that includes a travel lane for vehicles would not be consistent with the Parkway General Plan. We recommend that this clarification be added.

M 1.6 (Transportation and Land Use Coordination)

The Mobility Element should support and reinforce the Land Use Element of the GP.

M 1.7 (Equity of Access)

People’s ability to walk or bike to local services varies widely across the City. Pedestrian and bicycle access is often much more difficult in poorer neighborhoods, especially along major arterials. This is an environmental justice issue and also has serious implications for health and nutrition. ECOS recommends that the City adopt a stated Equity of Access policy committing to enhanced ped/bike access in underserved areas of the City. We suggest the following language: “The City shall prioritize low-income areas when considering roadway improvements to enhance pedestrian and bicycle access to services.”

Walkable Communities

M 2.1.2 (Sidewalk design)

Change “in districts intended to support active pedestrian use” to “wherever possible.” All sidewalks should be designed to encourage active pedestrian use.

M 2.1.5 (Continuous Network)

Add “Pedestrian crosswalks shall be provided at every leg of every intersection, to provide a continuous network.”

M 2.1.10 (Safe Pedestrian Crossings)

Remove “bulb-outs.” Bulb-outs are opposed by bicycle advocates because they create a major hazard to bicyclists while providing only minimal benefit to pedestrians.

Public Transit

M 3.1.13

Although ECOS strongly supports enhanced transit access to and from the Sacramento International Airport, we do not support the City’s clear commitment to the currently proposed Light Rail expansion to the airport. Most of the City is currently grossly underserved by transit. There is a need for more guidance in the policies with regard to public transit priorities and other modes of transport in consideration of the most efficient and beneficial fiscal resource allocation that supports the multifaceted goals of the general plan. An expensive new light rail line to the airport with questionable ridership numbers and serious environmental implications should not be a City transportation priority at this time.

M 3.1.23 (Direct Access to Stations)

Remove “to the extent feasible” (this is inherent in all policy statements). Also, add “direct grade level pedestrian and bicycle access to the station area.” RT currently has plans for the new south area stations that include pedestrian over-crossings of major roadways. These are not acceptable as routes into a transit facility, and should be replaced with grade-level crossings.

M 3.3.3 (Taxi Service)

Sacramento’s taxi fleet contains a disproportionate number of old vehicles with poor gas mileage. ECOS encourages the City to regulate the gas mileage and/or fuel type of taxis or to provide incentives for improvements.

Roadways

M 4.1 (Goal)

This goal makes no mention of the key policies of reducing CO₂, pollution and auto dependence or of encouraging alternative travel modes. The Roadway section of the Mobility Element is the most important place to integrate these goals into specific policies, because roadways are the main determinants of all transportation outcomes.

M 4.1.2 (Balancing Community Impacts with Economic Development Goals)

This policy should include environmental impacts.

M 4.2 (Complete Streets)

We commend the City for adopting a policy on Complete Streets and for being in the forefront of the national movement to define what this term actually means.

M 4.2.2 (Pedestrian and Bicycle-Friendly Streets)

The term “pedestrian refuge” suggests that pedestrians are second-class users of the street. We suggest that this sentence should read “large medians to reduce perceived pedestrian crossing distances.” We also suggest that the reference to “frontage roads” be removed, because if the arterials are bicycle- and pedestrian-friendly there should be no need for frontage roads.

M 4.2.6 (Identify Gaps in Complete Streets).

We commend the City for this far-sighted policy, which will allow the principle of road diets to be extended from midtown out to other areas of the City where it is more desperately needed. We encourage the City to identify the arterials that are most in need of lane reductions and improvement of pedestrian and bicycle facilities, and then, in the interest of environmental justice, to prioritize streets in low-income neighborhoods for road diets.

We also recommend that, to be effective, this policy should include a statement of how “gaps” are to be identified by the City, for instance that “Candidate streets should be identified on the basis of the quality of their existing pedestrian and bicycle facilities, and the degree of overcapacity of the existing roadway.”

M 4.3 (Neighborhood Traffic)

Note that in the figure, a traffic circle is wrongly labeled as a roundabout.

ECOS is concerned about the City’s rationale for “managing neighborhood traffic,” specifically that the existing Neighborhood Traffic Management Program (NTMP) is an expensive NIMBY program that forces traffic on to some streets at the expense of others and leads to a net increase in VMT and pollution. We also note that the goal of this section is vague (“Enhance the quality of life within existing neighborhoods...”).

The three policies on the NTMP in the GP (M 4.3.1-4.3.3) could be combined into a single policy. We also recommend the addition of a policy stating that the City will review the NTMP for compliance with the City’s other transportation goals and social and environmental justice.

One approach to neighborhood streets that ECOS believes could be beneficial for the City is the German idea of “spielstrasse,” (i.e., short streets that are limited access for motor vehicles and are therefore safe enough for children to play in the street). This would be a logical extension of current NTMP programs that slow and calm traffic.

M 4.4 (Roadway Functional Classifications and Typology)

“Main Streets” and “Mixed Use Streets” are clearly not possible on major arterials, as shown in Table M1. These uses require frequent access and pedestrian-friendly environments, which are not possible along a major arterial. Major arterials would have to be re-designated as minor arterials to receive this treatment.

We also note that “commercial streets” and “industrial streets” are highly unlikely to be residential streets, as shown in the table.

The text for Main Streets states that “unlike commercial streets, Main Streets are designed to promote walking, bicycling and transit.” There should not be **any** street types that do *not* encourage walking, bicycling and transit (i.e., **all** streets **should** promote walking, biking and transit use). Planning for streets that do not promote walking, biking and transit is inconsistent with most of the other policies in the GP. Also, remove “arterial main street segment” and “curb extensions” (see section 2.1.10).

M 4.5 (Intersection Air Quality and GHG Impacts)

A logical and effective extension to the City's existing policies to reduce greenhouse gases and improve air quality would be to conduct an analysis of the greenhouse gas impacts of various intersection types. Specifically, we believe that the City should investigate the increased use of roundabouts to help maintain low and therefore safe vehicle speeds, and to reduce the noise, expense and pollution associated with braking and accelerating. Large roundabouts could be used in place of some large signalized intersections, and small ("mini") roundabouts could be used in place of the traffic circles currently installed in Midtown, and in other neighborhoods. Roundabouts have consistently been shown to dramatically reduce the number of vehicle collisions, and can be made pedestrian- and bicycle-friendly.

Bikeways

M 5.1.7 (Class II Bikeway Requirements)

This is an excellent and very simple policy. ECOS commends the City for adopting this policy. It would be appropriate to require that "Bikeways along roads with speed limits over 35 mph shall be at least 6 feet wide. Bikeways along other arterials and collectors shall be at least 5 feet wide."

ECOS recommends that, following the success of the road diets and addition of bike lanes in midtown, this policy should be expanded to require all roads in the central business district to be converted to two lanes, preferably with two-way traffic.

M 5.1.8 (Connections Between New Developments and Bikeways)

We support the intent of this policy but we believe the language is ambiguous. It could be taken to mean that developers simply have to stripe class II bikeways along their arterials, whereas we believe the intent is that developers should provide frequent access points for bicyclists and pedestrians to enter or leave the development, not just by a single large roadway but by a multitude of smaller, more convenient access points.

We also believe this policy can apply equally to commercial developments as to residential developments.

M 5.1.15 (Continuous Network)

ECOS recommends that, as per pedestrian facilities, the City adopt a policy to provide a continuous network of bikeways (i.e., eliminate gaps).

M 5.1.16 (Class III Bikeways)

The existing Class III bikeway network is designed to be a continuous network of low-speed streets, suitable for less confident bicyclists. At present, the utility of this network is low because cyclists do not know where the "bike routes" lead and therefore have a reduced incentive to use them. We encourage the City to provide Class III routes with names and to provide informative on-street signage with destinations and distances. The Class III network is a useful resource and should be emphasized because of its potential role in promoting cycling to novice riders.

Parking

M 6.1.1 (Appropriate Parking)

Change “appropriate parking is provided” to “excessive parking is avoided.”

M 6.1.2 (Reduce Minimum Parking Standards)

We support this policy. Parking is an extremely poor use of land in urban centers. We recommend that the City move toward abolishing minimum parking standards entirely over the next few years.

We also recommend that the title of this policy be changed to “Parking Standards” and include three additional requirements. First, the City should institute *maximum* parking standards for commercial and residential developments. Second, the City should institute standards for the maximum allowable length of vehicle parking bays. Third, the City should require on-street bicycle parking in urban centers.

M 6.1.6 (Residential Permit Parking)

The current residential permit parking system makes it illegal for non-residents to park in controlled areas *during the day*. ECOS believes that the City should investigate alternative time restrictions that allow non-residents to park during the day for commercial reasons, to maximize the use of parking spaces and to reduce the demand for additional spaces (per 6.1.4, Reduction of Parking Areas). Residents would be the only users allowed to park in controlled areas overnight.

M 6.1.7 (Disincentives for Single-Occupant Vehicle Trips)

We support this policy but note that alternative transportation is available throughout the City (bicycling, walking and buses) so this policy should be extended to cover all areas of the City.

M 6.1.9 (Parking Discounts)

Monthly discounts or other bulk discounts for parking create a strong disincentive for workers to use transit, bicycling or walking as a means of getting to work. We recommend that the City institute a policy of not offering bulk discounts in City-operated parking facilities and consider adopting a policy of requiring private parking facilities not to provide bulk discounts.

III. ENVIRONMENTAL RESOURCES

Many general plans, including those for Solano and San Luis Obispo Counties, have general plan policies promoting the adoption of agricultural lands protection policies by the county Local Area Formation Commission (LAFCo). Having policies adopted by the county LAFCo, in addition to the general plans of cities and counties, is critical to effectiveness of general plan policies for the protection of agriculture. Otherwise, one jurisdiction’s policies will be circumvented by annexations by other jurisdictions. The City of Sacramento’s GP should include an explicit policy calling on the Sacramento County LAFCo to adopt policies for the protection of agriculture.

The Environmental Resources policies in the City's GP also need to be expanded and strengthened. When the Sacramento County LAFCo considered adopting an agricultural and open space protection policy, the City's representative argued that LAFCo should rely on the policies of local jurisdictions instead. As discussed above, a LAFCo policy is needed to prevent a race to the bottom, where developers seek annexation by the jurisdictions with the weakest policies. Even in the absence of a LAFCo policy, however, and especially if the City continues to contend that a LAFCo policy is unnecessary because the issue can be addressed in local policies, the City should adopt policies that serve as a model for other jurisdictions. The policies in the proposed GP fall short in this regard.

Several of the policies in the Environmental Resources Element call for the protection of resources "to the extent feasible" (e.g., Policies 2.1.5-2.1.8). There needs to be guidance as to what "to the extent feasible" means. Otherwise this language is an escape route for political expediency in decision-making.

Additionally, certain policies call for the protection of biological resources — riparian habitat, annual grasslands, oak woodlands, wildlife corridors, and the like. Glaringly, there is no link in the policies to specific identified resources within the City limits. Such a connection needs to be made. There remain significant gaps in the policy framework of the General Plan to guide a conservation strategy that ensures the policies are effectively implemented. ECOS would like to work directly with City staff to develop a comprehensive and viable resource protection plan relating to specific biological resources within the City. For example, the proposed policies do not include any special protection for prime farmlands, farmlands of statewide importance, unique farmland, farmland of local importance or grazing lands. The GP should include specific policies that will protect such areas.

Further, the GP does not include any policies requiring mitigation for loss of agricultural lands. A new policy should be added, comparable to the City of Davis' farmland mitigation ordinance, requiring that when farmland is converted to non-agricultural uses, the loss should be mitigated in the amount of two acres for every acre developed, with the mitigation required by either purchasing conservation easements or paying an in-lieu fee to a land trust that will purchase easements. The GP should also include policies designed to prevent subdivision of agricultural lands into parcels too small to support working agriculture, and to encourage consolidation of lands where small lot size may prove an obstacle to effective management of the land for agricultural uses.

ER 4.2.2

Providing for a one-mile buffer along the Sacramento River and other areas outside the city is an excellent concept, but as drafted may be self-defeating. First, by its terms the buffer applies to areas "outside the city." Does this mean that if the City of Sacramento annexes lands within a mile of the Sacramento River that the policy no longer applies? Similarly, it is not clear how the policy applies to areas north of the city limits that are proposed for annexation.

Climate Change and Greenhouse Gas Emissions

With respect to climate change and greenhouse gas emissions, the Santa Cruz General Plan has the following policies which might serve as a basis for helpful language in the Sacramento

General Plan. In particular, ECOS would like to note that the City of Sacramento needs to adopt policies addressing how it will deal with rising sea level.

NRC 4 Effective leadership and action in reducing and responding to global warming.

NRC 4.1 Reduce community-wide greenhouse gas emissions 30 percent by 2020 and 80 percent by 2050 (compared to 1990 levels).

NRC 4.2 By 2030, require that all new development be carbon neutral.

NRC 4.3 Support initiatives, legislation, and actions for reducing and responding to climate change.

NRC 4.4 Encourage community involvement and public-private partnerships to reduce and respond to global warming.

NRC 4.5 Minimize impacts of future sea level rise.

NRC 4.6 Take early action on significant and probable global warming land use and development issues, including those that might arise after 2025.

IV. HOUSING

We believe that this is a crucial element of the General Plan and reserve comment until it is incorporated in the draft. However, at this time we would like reiterate our strong support for city-wide extension of the City's inclusionary housing policy. It is critical to the progress and vitality of this City that inclusionary housing exist as a reality across all neighborhoods.

V. PUBLIC HEALTH AND HUMAN SERVICES

Goal PHS 6.1

There is a need to add the following:

“Encourage continuous review, analysis, and required upgrades of codes to provide for the fullest public health and public safety for all elements of the general plan.”

It will not be adequate to simply deal with enforcement of what is presently on the books if the goals of the general plan are to be fully met.

CONCLUSION

Of the most critical importance is the need to put in place as soon as possible the necessary implementation tools to support the GP's usage as the required guide for all future development

actions. This must include not only Zoning Code updates but also any necessary regulatory changes or additions to enable the preservation and enhancement of Sacramento's environmental resources, cultural diversity, and economic and social equity. Taken as a whole, the Draft GP is an impressive document. Again, ECOS commends City staff for their efforts. But this document should be seen as merely the beginning of a new approach to planning in this City. For this effort to achieve its full potential and bear its fullest fruit, the entire City must be engaged in the process of turning these plans into reality. ECOS looks forward to an ongoing relationship with the City as this process unfolds.

Thank you for the opportunity to comment on the City of Sacramento 2030 General Plan Draft. Please do not hesitate to contact us with any questions or concerns.

Sincerely,

A handwritten signature in black ink, appearing to read 'Graham Brownstein', with a long horizontal flourish extending to the right.

Graham Brownstein
Executive Director, ECOS

cc: Mayor Heather Fargo and City of Sacramento Councilmembers