



ECOS

ENVIRONMENTAL
♦ COUNCIL ♦
OF SACRAMENTO

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November 12, 2008

Attn: Mayor Heather Fargo, City of Sacramento Councilmembers
City of Sacramento Planning Commission
915 I Street, New City Hall, 5th Floor
Sacramento, CA 95814

Re: Failure of City to Adequately Address and Mitigate Impacts of Greenhouse Gas Emissions in
2030 General Plan

Dear Mayor Fargo, Councilmembers, and Planning Commissioners,

ECOS writes to reiterate our concern over the City of Sacramento's failure to adequately address greenhouse gas (GHG) emissions in the 2030 General Plan (Plan). It appears that the City has not incorporated suggested changes into the Plan that would satisfy the requirements imposed by the California Environmental Quality Act (CEQA) on the City with regard to the likelihood of significant cumulative impacts associated with increased GHG emissions over the life of the Plan.

Based on existing case law, guidance from the California Attorney General's office, and the recently adopted practices of numerous agencies and municipalities throughout California, it is clear that CEQA requires the City to analyze likely cumulative impacts of GHG emissions over the life of the Plan in order to make a significance determination. It is equally clear to ECOS that, given the growth projected by the current iteration of the Plan, cumulative impacts of GHG emissions will be significant. Thus the City is required to make firm commitments to projects, policies and other mitigation measures that will adequately address these impacts. Alternatively, the City can modify its Plan in ways that render GHG emissions impacts insignificant.

In its current iteration, and based on City responses to comments submitted on the Plan, there appear to be internal contradictions in the City's position with regard to GHG emissions. On the one hand, the Plan entertains the possibility of significant growth in currently undeveloped areas (Delta Shores, the Natomas Basin, and the Fruitridge-Florin Study Area). On the other hand, the City has claimed that GHG emissions will decrease over the life of the Plan without providing any credible evidence as to how a decrease would actually occur.

As ECOS has previously stated on numerous occasions, there is more than sufficient capacity within the City's existing boundaries to accommodate all growth anticipated over the life of this Plan. City representatives have responded that the City needs to expand to include currently undeveloped areas because if the City does not annex and incorporate new growth areas than the County of Sacramento will develop these same areas and the City can not afford to let this happen. The City has also stated that the mere fact annexation and incorporation of new areas may occur does not mean that development of those areas will be prioritized over infill growth. In the absence of specific commitments from the City to prioritize infill, however, there is no guarantee that the City can or will focus on managing growth in ways that will facilitate a reduction in GHG over the life of the Plan.

The plans for Delta Shores, an area already within City boundaries, provides a striking and extremely troubling example of the kind of large-scale development the City apparently foresees. Delta Shores is, in effect, a “Natomas South” or “Natomas II.” It is unconscionable that the City would entertain car-oriented and low density development plans for Delta Shores, particularly in light of the numerous opportunities for increasing densities in already developed areas within City boundaries. If Delta Shores is any indication of the kind of new growth development the City foresees, then not only will it be impossible for the City to reduce GHG emissions but the City will, in fact, dramatically increase its GHG footprint over the life of the Plan.

ECOS has long suggested a host of measures that, if prioritized by the City, would accommodate substantial growth without resulting in significant cumulative impacts associated with GHG emissions. These measures include: establishing a firm commitment to a growth boundary; focusing planning efforts on infill growth opportunities within the boundary; maximizing densities across the City, with particular focus on the urban core and transit and commercial corridors; committing to community-wide GHG emissions reductions of 30% by 2020 and 80% by 2050 (as compared to 1990 levels); requiring that all new development be carbon-neutral by 2030; removing parking minimums and reducing parking maximums; increasing on-street parking costs; enhancing parking enforcement to better manage the existing parking supply; and facilitating increased walking, biking and use of transit by establishing new fees to fund discounted transit pass programs and redirecting fees currently allocated for road expansions to sidewalks, bikelanes, and traffic-calming measures.

These measures will also bring other benefits, including: enhanced walkability, bikeability, and transit-access; improved safety; more efficient use of existing infrastructure and land; increased equity and accessibility for seniors, people on low or fixed incomes, and persons with disabilities; improved air quality; reduced demand on water supplies; and cost-savings and longer term revenue stability for City government along with reduced costs for local businesses, residents and visitors.

ECOS commends the City for entertaining a number of possibilities in the 2030 General Plan that could begin to address the City’s carbon footprint. However, in the absence of firm commitments to the kinds of measures outlined above, there will simply be no way for the City to actually guide and manage future growth in ways that will result in achievable and measurable GHG emissions reductions. The result will be a growing carbon footprint. The City can not afford to increase its carbon footprint over the next two decades. Nor can our region or state or planet sustain an increasing carbon footprint. The City of Sacramento needs to abide by the obligations imposed on it by CEQA and amend the 2030 General Plan in ways that address these concerns. Thank you for your time. Please do not hesitate to contact us with any questions.

Sincerely,



Eric Davis
President, ECOS



Graham Brownstein
Executive Director, ECOS

cc: City of Sacramento Manager Ray Kerridge
City of Sacramento Long Range Planning Manager Tom Pace
City of Sacramento Mayor-Elect Kevin Johnson
State of California Attorney General Jerry Brown