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Wednesday, July 27, 2016

Scott Johnson, Associate Planner
Department of Community Development
Planning and Environmental Review Division
827 7th Street, Room 225, Sacramento, CA 95814

SUBJECT: Sacramento Railyards Specific Plan Update, KP Medical Center, MLS Stadium, & Stormwater Outfall Subsequent Environmental Impact Report

Dear Mr. Johnson:

These are comments from the Environmental Council of Sacramento (ECOS), with dozens of individual members and organizational members in the tens of thousands. ECOS has a history of over 4 decades of advocacy to limit sprawl, preserve agriculture, habitat and open space, and improve the quality of life while supporting growth with a vibrant and equitable economy.

Alternatives to the Proposed Projects

The glaring deficiency in this SEIR is the lack of an Increased Density/Intensity Alternative.

Land Use, Transportation, Air Quality, Climate Change

ECOS believes that the requested zoning should include a **minimum** as well as a **maximum** number of housing units. Virtually all of the mitigations for Transportation, Air Quality and Climate change involve the enrichment of alternatives to automobile travel to, from and within the project. Other than automobile travel, all the other modes of transportation benefit from higher densities and more residential development, irrespective of the correction of any jobs/housing mismatch. Furthermore, the expensive infrastructure improvements necessitated by the project will not be as efficient at the proposed densities as they would at increased densities.

The addition of the Kaiser Permanente Medical Center (KP) provides ample basis on which to create plans for all-income housing development that would be synchronized with the creation of jobs in the project. Projects of this nature often favor early scheduling of commercial development, followed later, much later or never, by commensurate housing development. This pattern fosters the creation of undesirable patterns of housing, transportation, land speculation and delayed creation of public amenities that collectively depress the success of the integrated and holistic downtown desired by the City and by ECOS. An employer like KP includes one of the widest ranges of salaries imaginable, from low-skilled to some of the highest-skilled in

society today. Of all the ways to bring a wide variety of income levels to the project, this has to be one of the most effective. This is an opportunity that should not be squandered by timidity.

At its current capacity for growth, RT is struggling to figure out how to keep up with the proposed growth in the region. Much of this struggle is exacerbated by the relatively timid densities being proposed, including this project. As is often proposed as part of other projects in the region, ECOS would like to see the development of an aggressive Transportation Services District as part of this project. We believe that a fee assessment on a dwelling unit equivalent basis would provide support to RT, or a private shuttle provider, as well as support the functions of the Transportation Management Association.

A further boon to the mode share for RT for trips to, from and within the project would result from a program to make every ticket sold for an event at large venues in the project (e.g., the soccer stadium, major events in public spaces at the Railroad Museum, etc.) also serve as a day pass for unlimited rides on RT. We understand this is being considered by the Golden 1 Center and should also be a part of this project.

To this end the following mitigation steps are presented:

1. Establish a minimum residential density, say 75% of zoned maximum density, for buildout of the residential and mixed use zones
2. Require project phasing that requires timely construction of housing units in conjunction with construction of employment producing development
3. Require establishment of a fee assessment on a dwelling unit equivalent basis to provide enhanced transit support as recommended above
4. Require that agreements are in place prior to building permit approval that enable all tickets sold at large venues within the project area to be used as transit day passes.

Growth-inducing Effects

For this project, ECOS has no qualms about inducing growth in the vicinity of the project. In fact, the more growth induced near the project, the better. We believe the developers and the City agree with us. All the more reason why there should be a robust Increased Density/Intensity Alternative.

Conclusion

The efficacy of an Increased Density/Intensity Alternative should not be underestimated. A vast array of desirable outcomes accompanies higher densities than are proposed by the project, a location already zoned for the highest densities in the City, but one that could be painfully underutilized by the project as proposed. Smart growth is most successfully enabled when the residential and transportation infrastructure development occur prior to the successive stages of build-out, and thereby structure and guide them. Without this, we will suffer from substantial pressure to put these essential features in parts of the City that are not currently zoned for them, further weakening the excellent General Plan.

Sincerely,

A handwritten signature in blue ink, appearing to read "Alex Kelter", written in a cursive style.

Alex Kelter MD, Co-Chair
Land Use Committee
Environmental Council of Sacramento (ECOS)