



**ECOS**  
ENVIRONMENTAL  
• COUNCIL •  
OF SACRAMENTO

Post Office Box 1526 | Sacramento, CA 95812-1526

August 23, 2023

Mayor Steinberg and Sacramento City Councilmembers  
Sacramento City Hall  
951 I Street, Sacramento CA, 95814

Sent via email

**RE: City of Sacramento Draft General Plan Update, April 28, 2023, referred to as “GPU”**

Dear Mayor and City Councilmembers,

Thank you for the opportunity to comment. Our main comments concerning the GPU are as follows:

- The General Plan should include funding plans and a method of prioritizing projects based on funding availability.
- New street standards for transit, tree canopy, and walkability should be connected to the Street Classification System to ensure uniform Citywide implementation.
- The Plan should remove the Special Study Area in Natomas Basin and restore the protections to Biological Resources present in the 2015 GPU.

Please consider our complete arguments across the following pages. We look forward to engaging with you as the GPU advances, in order to help make this plan as best as it can be for the present and future residents of the City of Sacramento.

Sincerely,

Susan Herre AIA AICP  
President of the ECOS Board of Directors

cc:

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## **1) Land Use and Placemaking**

Within a half-mile of light rail stations and major bus corridors, we recommend a minimum FAR of 6.0 and a maximum FAR of 10.0. This maximum can create some consistency of urban density in the numbers of people living in an area, and in the building form -- especially the height to define a street wall and to create tree-lined promenades and plazas. Consistency of urban density makes it easier to build a sense of community and to feature important public spaces.

The centers of Washington DC and Paris, France, which level off at five to ten stories, have a strong sense of community and many places for the public to linger or gather. Cities with a few high rises in a sea of single- and two-story buildings have a harder time creating a sense of public place. Part of the equity issue in Sacramento is the lack of places where it feels good for the public to walk and gather.

To create conditions conducive to long-term home ownership in multifamily dwellings in infill areas, we recommend that residential buildings be a minimum of five stories to ensure the buildings have elevators which provide access to people of all ages and capabilities. We would like the City to encourage buildings with elevator-accessed apartments with generous balconies, as balconies make long-term living in a multifamily building possible -- they provide a get-away, a place to see the sky, to grow plants and chat with neighbors in a courtyard or street. Balconies could be required by the City for units in multifamily buildings to increase the numbers of long-term residents including families and older people.

## **2) Street Standards**

The Plan should connect the street standards for tree canopy (ERC-A.11), transit-only lanes (M-1.24), bicycle lanes (M-1.18), and sidewalk width with the Street Classification System established in M-1.1, such that different standards for transit, walkability, and canopy correspond with different street levels. This would allow improvements to be consistently applied throughout the City.

Furthermore, we advise the City to amend the language with which the Plan presents its Parking Management Strategy. M-2.17 currently states that the Parking Management Strategy "could" eliminate City-mandated parking minimums and implement parking maximums along established transit corridors. This should be strengthened so that the General Plan commits to eliminating parking minimums Citywide and to establishing parking maximums and transportation demand management plans. In addition to being sensible policy, this will bring the General Plan into accordance with TR-2.2 of the City Climate Action and Adaptation Plan, which pledges to "eliminate parking minimums citywide, develop parking maximums and require parking management and transportation demand management plans for all areas of the City."

## **3) Financing and Prioritization**

We note that discussions of funding are almost entirely absent from the General Plan Update. We recommend the General Plan include funding and financing options in the body of its text, and should be upfront about expected funding gaps. As part of this, the General Plan should prioritize goals and actions according to cost-effectiveness. In the likelihood that the City is unable to secure funding for all priorities inside the General Plan, the GPU should clearly delineate which items will assuredly receive funding, in contrast to which ones represent aspirations, to be completed if funding is secured. Without such a means of funding and prioritization explored within the body of the GPU, the General Plan itself stands as an aspirational text.

#### 4) Urban Heat

ERC-A.8 of the General Plan states its intention to “evaluate the feasibility of updating design guidelines, standards, and the municipal code to promote building materials and site design techniques that provide passive cooling and reduce energy demand”. This is highly important, but the Implementation Schedule marks it for completion more than 10 years into the future. ERC-A.8 should be moved forward in order for findings to be widely utilized as soon as possible, before the urban heat issue becomes much more severe.

#### 5) Landscaping Equipment

ERC-4.6 states “the City shall explore alternatives to gas-powered landscaping equipment.” Existing CARB regulations, however, will require newly sold small off-road engines, including those in landscaping equipment, to have zero emissions starting in 2024. To have maximum influence, we encourage the City to explore ways to facilitate replacing existing conventional landscaping equipment with all-electric equipment, including by committing to using only zero emission landscaping equipment on City property.

#### 6) Community Plans

The Central City Community Plan makes little mention of the planned Broadway and Truxel Bridges, besides both routes being suggested as High-Frequency Transit in Map CP-CC-6 of Central City Roadway Reallocations. We encourage the Plan to be forthcoming about these planned bridges.

We at ECOS support the City in exploring an annexation of County land in the Fruitridge Florin Study Area. We believe the City will be able to provide better services to the environmentally impacted, and historically disadvantaged communities therein, and through the City’s land use, zoning, and development policies, and its collaboration with SacRT, we believe the City can make real improvements in the built environment. Annexation of the Fruitridge Florin area would not require any change to the County’s Urban Services Boundary (USB). On the other hand, ECOS objects to the City’s inclusion of the Natomas Basin as a special study area, as discussed further in the next section.

#### 7) North Natomas and Biological Resource Policies (Comments by Friends of Swainson’s Hawk, FOSH)

The draft GP makes significant and unjustified changes in core City environmental policies compared to the GP passed in 2015. It also has internal conflicts.

We request the City maintain its commitment to the:

- Existing City boundary;
- Natomas Basin Habitat Conservation Plan and the Natomas Basin Conservancy;
- Sacramento County Urban Services Boundary and farmland protection policies.

Furthermore, we request the special study area in Natomas Basin be removed from the General Plan. This study area has been included in the General Plan because of a City/County MOU in 2002 which we urge the Council to terminate. By accepting applications for urban development, the County has violated the terms of the agreement and it is void.

We request the Council explicitly reject the notion that Natomas Basin can accommodate future new growth. The

Natomas Basin Habitat Conservation Plan permits 17,500 acres of development within the Basin, achieving a balance of farmland, urban uses, airport buffer, flood control, and habitat protection that the City agreed to in 1997.

We request the City Council ensure that the General Plan does not authorize the expansion of the Sphere of Influence in Natomas. The staff argument for expanding the Sphere (see page 11-SSA-6) is that the County proposed development on the city’s edge would be better integrated with City if the Sphere were expanded. We dispute this assertion. The City should resolutely oppose urbanization on the City’s border to protect its investment in habitat and the North Natomas Community Plan, not set itself up to negotiate with the County.

The purpose of a Sphere of Influence is to define the future boundary of urbanization.

Landowners are proposing development, not the County.

The County has in place several General Plan policies that protect agriculture and preserve farmland in Natomas. Four County Supervisors must make a finding of extraordinary circumstances to change the Urban Services Boundary, which is intended to be permanent and to protect agriculture and biological resources.

We request the maps of the Natomas Basin in the draft General Plan be revised to accurately show the permanently protected mitigation lands in the Basin. For your reference these mitigation lands are shown on the map below: about 5,000 acres protected by the Natomas Basin Conservancy and another 1,000 acres protected by SAFCA, the County Airport and Greenbriar. For the map below, we can provide the GIS files to the City if needed.

We request the text and maps in the draft General Plan be revised to remove the unincorporated parcels adjacent to Westlake from the North Natomas Community Plan. The draft General Plan now shows unincorporated parcels adjacent to Westlake as part of the North Natomas Community Plan. (p.11-NN-1 and 2). This is not accurate since the City boundary does not include these parcels and a community plan is a part of an incorporated city. The community plan must be consistent with the General Plan and this community plan does not conform to the boundaries of the General Plan. See GP 2040 maps LUP-1, LUP-2, LUP-3, LUP-4. A community plan must be consistent with all parts of the General Plan.

We request the Council retain the Biological Resources (ERC2) in the 2035 General Plan, adopted in March 2015, rather than change to those in the 2040 draft General Plan.

The Biological Resources section of the draft General Plan dramatically reduces the protections contained in the current 2015 General Plan. It reduces 16 specific policies to five. Specific policies that have been removed include references to the Natomas Basin Habitat Conservation Plan and the Natomas Basin Conservancy. Rather than celebrate the achievement of a basinwide conservation plan, the significant habitat lands preserved, and acknowledge the continued support of County policies to maintain the Basin largely as farmland and habitat, this General Plan draft avoids embracing the City's prior commitment to habitat conservation.

The Natomas Basin Habitat Conservation Plan mitigates the development in the North Natomas Community impact on habitat and threatened species and demonstrates what the City has achieved in protecting natural areas. The General Plan should acknowledge rather than obfuscate this achievement.

In contrast to the approach of the draft General Plan to Biological Resources, the policies in Chapter 3 largely support compact growth and protection of natural areas. Maps LUP-1,2,3,4 retain the existing city boundary. For example: LUP-1.11 Coordinate to Protect Farmland. The City shall continue to work with Sacramento County and other adjacent jurisdictions to implement conservation plans, preserve farmland and protect critical habitat outside the city.

Again, we request that Natomas Basin be removed as a Special Study area from the text on p. 3-17 and from the Map LUP-5.

