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September 13, 2018

Sacramento County Environmental Coordinator
Office of Planning and Environmental Review
County of Sacramento
827 7th Street, Room 225
Sacramento CA 95814

Dear Coordinator:

These comments are submitted on behalf of the Environmental Council of Sacramento (ECOS) on the NEWBRIDGE SPECIFIC PLAN DRAFT ENVIRONMENTAL IMPACT REPORT (Control Number: PLNP2010-00081). ECOS is a coalition of environmental and civic organizations with a combined membership of more than 52,000 citizens throughout the Sacramento Region. Our mission is to achieve regional and community sustainability and a healthy environment for existing and future residents.

ECOS is vitally concerned about the preservation of natural resources both in developed and undeveloped areas. Economic pressures from climate change, international competition, and a host of other sources demand that this region maintain the highest possible quality of life in order to attract and create the most desirable and successful opportunities for our residents. Numerous surveys and research analyses support the importance of access to nature for optimal health and quality of life, especially for children. Smart urban development and preservation of natural resources go hand in hand, and this DEIR, more than many, reflects the complexities of this parcel in both regards.

Alternatives

Alternative 5 (No Project) is found not to be the most environmentally friendly, yet Table AL-5 clearly shows its environmental superiority over all the other alternatives.

Air Quality

Alternative 1 contains the same number of dwelling units on a smaller footprint, so that “air quality impacts would remain similar”. But the smaller footprint should be more conducive to efficient transit, yet this well-known phenomenon is not factored into the analysis.

Alternative 5 would allow the SRC to continue operations. Are we to assume that reduction of existing odor production is another justification for the project?

Land use

This area should be treated in the same fashion as the remainder of the Jackson Corridor. ECOS has long indicated that the County must establish a logical and progressive schedule for the development of the Jackson Corridor, consistent with [mitigation measures LU-1 - LU-3 in the EIR](#) for the Sacramento County General Plan.

For example:” LU-1. Growth within the Jackson Highway Corridor and Grant Line East New Growth Areas shall be phased through master planning processes. The phases shall be defined by a specific geographic area, with the earliest phases closest in to the existing urban areas, and the later phases farthest outward. Each phase shall represent a geographic area that will accommodate no more than 10 years of growth,

based on the latest SACOG projections. Development within the phases shall occur sequentially, and residential or commercial development in each subsequent phase shall be prohibited until the prior phase is developed to at least 50% of holding capacity.

Without such a schedule for the entire area, the development pattern will be a free-for-all and the resulting development will exemplify that. Further, the development will not be consistent with the mitigation measures **required** in the CEQA review for the Sacramento County General Plan. A scheduled plan for the entire Jackson Corridor area must be prepared before any development proceeds. The Board of Supervisors has been reluctant in the past to apply any meaningful logical progression to new development, including in the General Plan, despite the mitigation measures that the County **committed to** as part of CEQA review for its general plan. ECOS continues to believe this to be a massive error in judgement, one that should not be repeated in this DEIR. Failure to establish such a schedule pits project against project for, among other things, allowable greenhouse gas emissions (as per SB 375's Sustainable Community Strategy), and allows "the market" to set the County's priorities, instead of the Board setting them.

We do not believe this project meets all criteria PC-1 through PC-10 in LU-120, and therefore does not qualify for adjustment of the UPA. In particular, we are having trouble understanding how the project is consistent with SACOG's Blueprint when a substantial amendment is needed to achieve this "consistency". This amendment would change the timing of developing here from "after 2030" to "before 2030." SACOG projects the NEED for *future* development of this area. Nothing in the proposal demonstrates why that "future" is "now". We assume it's because the developer is ready now, rather than that the NEED has suddenly arisen.

LU-120 lists the 10 criteria that must be met to expand the UPA.

PC-1. We do not see a vision for connectivity based upon anything other than wishful thinking. Certainly transit connectivity has no visible means of support in this proposal.

PC-5 Transit-oriented Design (TOD) is required. Without a plan for how the transit would be supported, we do not agree that this criterion is being met.

PCC-7 It is not possible to confirm the cost-neutrality of this proposal without a more completely described method of supporting transit.

PC-9 consideration of regional planning efforts is not satisfied when the only way the project is said to be "consistent" with Blueprint is if it is amended. That sounds more like **inconsistency** to us.

Consistency with Blueprint also is said to be satisfied by proximity to the "existing community" of SunRidge Specific Plan, only after taking great pains to identify how connectivity to truly adjacent developments are limited by a wetland preserve and the vernal pool preserve at Mather. In the end, adjacency is established by neither the north side nor the east side of the proposed development, but rather ONE POINT (the corner of the property).

Project also includes a "multi-modal transportation system", but does not demonstrate how the financial viability of the system will be accomplished. It's an idea, not a plan, and therefore does not satisfy LU-34, etc. After all, without a T, there is no TOD.

Biological Resources

This comment letter incorporates by reference the comment letter prepared by the California Native Plant Society.

This project must rely on the SSHCP for endangered species coverage and follow its conservation strategy and mitigation guidelines. In the absence of the SSHCP, it must follow the Record of Decision for the Sunridge Properties project.

Traffic and Circulation

Providing adequate transit service to this project, and other projects in the Jackson Corridor, must be a critical component of this Specific Plan to achieve the objectives of the General Plan. Only through the provision of a robust transit system can vehicle miles traveled be reduced and green house gas reductions be achieved.

When ECOS last met with County staff and representatives of the projects in the Jackson Corridor we were assured that a Transportation Services District (County Service Area) would be established for all the projects in the Jackson Corridor. In fact, we were provided with a draft document which indicated the annual assessment per dwelling unit for each project (attached).

In reviewing the DEIR, what we find is a very vague and in our view unenforceable mitigation measure TC-4.

MITIGATION MEASURE TC-4: TRANSIT SYSTEM The Project applicant shall coordinate with Sacramento County and Sacramento Regional Transit District (or other transit operators) to provide the additional transit facilities and services assumed in the transportation analysis, or a cost-effective equivalent level of transit facilities and services. Ultimate transit service consists of 15- minute headways during peak hours and 30-minute headways during non-peak hours on weekdays. The implementation of the transit routes and service frequency must be phased with development of the Project and the ultimate service will be required at full development of the Project.

The operative word in this mitigation measure appears to be "coordinate". There is no assurance that adequate transit service will be provided or, most importantly, how it will be funded. Therefore based upon our previous assurances from the County and the project proponents in the Jackson Corridor, the mitigation measure must be revised to read:

MITIGATION MEASURE TC-4: TRANSIT SYSTEM Prior to the recordation of any final subdivision map for the New Bridge Project, a Transportation Services District shall be formed. This can be accomplished through the annexation to County Service Area 10 or through the establishment of a new County Service Area. Prior to annexation to County Service Area 10 or the establishment of a new County Service Area, an engineering study shall be undertaken to determine the annual dwelling unit equivalent assessment for the projects in the Jackson Corridor to provide the additional transit facilities and services assumed in the transportation analysis. Ultimate transit service consists of 15- minute headways during peak hours and 30-minute headways during non-peak hours on weekdays. The implementation of the transit routes and service frequency must be phased with development of the Project and the ultimate service will be required at full development of the Project.

Only a clearly stated mitigation measure, as we have stated here, can withstand legal challenge. While ECOS has supported development in the Jackson Corridor, that support was predicated upon the assurance that adequate transit service would be provided to significantly reduce environmental impacts. This approach has been applied to other projects in the southeast County area in the past and there is no reason to change the approach now.

This project is part of the Jackson Corridor Development Area, so the project area should be treated the same as the other projects in the area. As advocated by ECOS in the past, the other projects in the Corridor have agreed to establish a Transportation Services District with a per dwelling unit equivalent assessment for transportation services. This approach is critical to the development of this entire area and is crucial to reducing ozone precursors and greenhouse gas emissions.

Without the mitigation measures described here and under **Land Use** [above], this DEIR must be considered incomplete and inadequate, since these and other feasible mitigation measures have not been applied.

Conclusion

ECOS supports development along Jackson Highway to the extent that it is based on demonstrable need above and beyond infill development of existing vacant parcels in the County that are closer to existing commercial corridors, better connected to transit, contiguous with existing development, and thereby provide much-needed support to RT. This appears to us to require a logical progression of development, generally from west-to-east, since the western portion is closest to existing transit routes and the City of Sacramento.

Thank you for the opportunity to submit these comments.

Respectfully Submitted,



Alex Kelter MD
Chair, Land Use Committee