



Final Master Environmental Impact Report for the City of Sacramento 2035 General Plan Update

City of
SACRAMENTO

January 2015

Prepared for the City of Sacramento,
Community Development Department,
Environmental Planning Services

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LR12-003 SCH # is 2012122006



City of Sacramento 2035 General Plan Update

Final Master Environmental Impact Report

SCH #2012122006
City Project #LR12-003

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ACRONYMS AND ABBREVIATIONS

BVOC	Low Biogenic Volatile Organic Compound
CEQA	California Environmental Quality Act
LOS	Level of Service
LURMP	Land Use and Resource Management Plan
MEIR	Master Environmental Impact Report
MTP/SCS	2012 Metropolitan Transportation Plan/Sustainable Communities Strategy
NPDES	National Pollution Discharge Elimination System
Sacramento LAFCo	Sacramento Local Agency Formation Commission
SMAQMD	Sacramento Metropolitan Air Quality Management District
SRCSD	Sacramento Regional County Sanitation District
SRWTP	Sacramento Regional Wastewater Treatment Plant
WDR	Waste Discharge Requirement

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1 INTRODUCTION

1.1 OVERVIEW AND PURPOSE OF THIS DOCUMENT

This Final Master Environmental Impact Report (MEIR) for the City of Sacramento 2035 General Plan Update has been prepared by the City of Sacramento, Community Development Department, Environmental Planning Services, as the Lead Agency for the project. This Final MEIR has been prepared in accordance with the California Environmental Quality Act (CEQA) and together with the Draft MEIR (and Appendices) constitutes the MEIR for the proposed project. This document includes all agency and public comments received on the Draft MEIR during the public comment period held from August 11, 2014 through September 25, 2014. Written responses are provided to each comment that correct, clarify, and amplify text in the Draft MEIR, as appropriate. These changes do not alter the environmental impact and significance conclusions of the Draft MEIR.

1.2 PROPOSED PROJECT

The proposed Sacramento 2035 General Plan is the first five-year review and revision the City of Sacramento has conducted since the adoption of the existing 2030 General Plan in 2009. The proposed 2035 General Plan retains the overall land use and policy direction established in the 2030 General Plan, and contains a refinement and updating of the goals and policies, including the following:

- ▲ updated housing, employment, and population forecast for the planning timeframe through 2035;
- ▲ update of the Housing Element to cover the period from 2014 to 2022;
- ▲ update of the traffic level of service (LOS) policy to implement a flexible, context-sensitive LOS standard;
- ▲ compliance with recent flood risk legislation; and
- ▲ integration of the adopted Climate Action Plan into the 2035 General Plan.

Previously proposed updates to the parkland service level standards, which were described and evaluated in the Draft MEIR, are no longer included as part of the proposed 2035 General Plan.

1.3 PUBLIC REVIEW AND RESPONSES TO COMMENTS

On August 11, 2014, the City distributed a notice of availability of the Draft MEIR to public agencies and the general public, submitted the documents with a notice of completion to the State Clearinghouse, and published a public notice in *The Sacramento Bee*. The Draft MEIR was published on the City's Community Development Department and General Plan websites (<http://portal.cityofsacramento.org/Community-Development/Planning/Environmental/Impact-Reports.aspx> and <http://portal.cityofsacramento.org/Community-Development/Planning/Long-Range/General-Plan/General-Plan-Update>). In accordance with State CEQA Guidelines Section 15105, a 45-day review period (August 11, 2014 through September 25, 2014) was established to obtain comments on the Draft MEIR. In addition, the City held three open houses during the Draft MEIR public review period:

- ▲ September 3, 2014, 5:30 p.m. to 7:00 p.m. at Pannell Meadowview Community Center, 2450 Meadowview Road, Sacramento, California 95832
- ▲ September 4, 2014, 5:30 p.m. to 7:00 p.m. at New City Hall, 915 I Street, Sacramento California 95814

- ▲ September 8, 2014, 5:30 p.m. to 7:00 p.m. at South Natomas Community Center, 2921 Truxel Road, Sacramento, California 95833

State and local agencies provided written comments on issues evaluated in the Draft MEIR. This Final MEIR has been prepared to respond to those comments and to make appropriate revisions to the Draft MEIR, consistent with Sections 15089 and 15132 of the State CEQA Guidelines. Responses to each of the comments received are provided in Chapter 4, “Draft MEIR Comments and Responses,” of this Final MEIR. Although some of the comments have resulted in changes to the text of the Draft MEIR (see Chapter 5, “Corrections and Revisions to the Draft MEIR”), none of the changes constitute “significant new information” as defined in Section 15088.5(a) of the State CEQA Guidelines, which would require recirculation of the Draft MEIR. Examples of significant new information include disclosures showing that:

- ▲ A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
- ▲ A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.
- ▲ A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the environmental impacts of the project, but the project’s proponents decline to adopt it.
- ▲ The Draft MEIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.

1.3.1 Comments That Require Responses

Section 15088(c) of the State CEQA Guidelines specifies that the focus of the responses to comments shall be on the disposition of significant environmental issues. Responses are not required on comments regarding the merits of the proposed update or on issues not related to environmental impacts. Comments on the merits of the proposed update or other comments that do not raise environmental issues are noted in the responses, and will be reviewed by the City Council before it takes any action on whether to approve the proposed 2035 General Plan update. When a comment does not directly pertain to the environmental issues analyzed in the Draft MEIR, does not ask a question about the adequacy of the analysis contained in the Draft MEIR, or does not challenge an element of or conclusion of the Draft MEIR, the response will note the comment and provide additional information where possible. The staff report prepared as part of the hearing process will address non-environmental comments and the policies that could be affected.

1.3.2 Review of the Final MEIR

This Final MEIR and associated appendices are available for review online at:

- ▲ <http://portal.cityofsacramento.org/Community-Development/Planning/Environmental/Impact-Reports.aspx>
- ▲ <http://portal.cityofsacramento.org/Community-Development/Planning/Long-Range/General-Plan/General-Plan-Update>

Copies are available at the following locations:

- ▲ City of Sacramento, Development Services Department, 300 Richards Boulevard, 3rd Floor, Sacramento, California 95811

▲ Sacramento Public Library, 828 I Street, Sacramento, California 95814

Lead agencies are required to provide responses to public agency comments on Draft EIRs at least 10 days before the certification of the Final EIR (Section 15088[b] of the State CEQA Guidelines). This Final MEIR document is being sent to agencies and other interested persons who commented on the Draft MEIR. Notice of release of the Final MEIR will also be provided to all persons and entities who submitted written comments.

1.4 EIR CERTIFICATION AND PROJECT DECISION PROCESS

As the decision-making body of the lead agency, the City Council is responsible for certifying that the MEIR has been completed in compliance with CEQA, that the information in the Final MEIR has been reviewed and considered, and that the MEIR reflects the City's independent judgment. Following adoption of a resolution certifying the Final MEIR, the City Council has the authority to approve, approve with modifications, or reject the 2035 General Plan Update. The City Council would approve the update by adoption of a resolution. For each significant environmental effect identified in the MEIR, the City Council must issue a written finding reaching one or more of three possible conclusions pursuant to Section 15091 of the State CEQA Guidelines:

- ▲ changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant environmental effect as identified in the Final MEIR;
- ▲ such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency; or
- ▲ specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the Final MEIR.

If any significant unavoidable impacts would result from the approval of project elements, the City Council would also be required to state in writing why it proposes to approve the project despite these significant unavoidable impacts. This is termed a Statement of Overriding Considerations, pursuant to Section 15093 of the State CEQA Guidelines.

The City's decision whether to deny or approve the project would be provided at a public hearing, as discussed above. If the project is approved, a Notice of Determination would be filed, within five working days of approval, at the State Clearinghouse, Governor's Office of Planning and Research.

1.4.1 Mitigation Monitoring Plan

Mitigation monitoring plans are required under Section 15097 of the State CEQA Guidelines. These plans, which are generally adopted upon approval of a project, describe the actions that must take place to implement each mitigation measure, the timing of those actions, and the entities responsible for implementing and monitoring the actions.

The proposed 2035 General Plan has been prepared with environmental impact reduction as a central theme; the plan is, therefore, intended to be self-mitigating through the use of environmentally protective policies. This MEIR identifies one mitigation measure. "Mitigation Measure 4.12-1: Widen 47th Avenue from 4 to 6 lanes" calls for widening the segment of 47th Avenue between State Route 99 and Stockton Boulevard from 4 lanes to 6 lanes to improve the level of service in this area. Because this segment of 47th Avenue is a county road and does not fall within the City's jurisdiction, the City cannot ensure implementation of this

mitigation measure. This mitigation measure is also not consistent with the County of Sacramento's General Plan and may be infeasible due to physically constrained right-of-way.

A mitigation monitoring plan will be provided to the decision makers for adoption.

1.5 ORGANIZATION AND FORMAT OF THE FINAL MEIR

The remainder of this Final MEIR is organized as follows:

Chapter 2, "Summary of the Project Description," presents a summary of the project description.

Chapter 3, "List of Agencies and Persons Commenting," contains a list of all of the agencies or persons who submitted comments on the Draft MEIR during the public review period, ordered by agency, organization, individual and date.

Chapter 4, "Draft MEIR Comments and Responses," contains all comments received on the Draft EIR during the public review period and presents responses to significant environmental issues raised in the comments, as required by Section 15132 of the State CEQA Guidelines. Copies of all the submitted comment letters are reproduced in their entirety. The comment letters are organized by sender (agency, individual/business, or organization) and by date received. Each comment letter is presented with brackets indicating how the letter has been divided into individual comments. Each comment is given a binomial with the letter number appearing first, followed by the comment number. For example, comments in the first agency letter, Letter A1, are numbered A1-1, A1-2, A1-3, and so on. Immediately following the letter are responses, each with binomials that correspond to the bracketed comments.

If the subject matter of one letter overlaps that of another letter, the reader may be referred to more than one group of comments and responses, including Master Responses, to review all information on a given subject. Where this occurs, cross-references to other comments are provided.

Chapter 5, "Corrections and Revisions to the Draft EIR," presents specific changes that were made to the text of the Draft EIR in response to comments raised or new project information. Revisions are shown as excerpts from the Draft EIR text, with changes indicated by strikethrough (~~strikethrough~~) where text has been removed and by double underline (double underline) where text has been added.

Chapter 6, "References," identifies the documents and personal communications cited in this document.

Chapter 7, "Report Preparers," identifies the preparers of this document.

2 SUMMARY OF THE PROJECT DESCRIPTION

The City of Sacramento is considering a proposed update to its general plan, called Sacramento 2035 General Plan, which is the subject of this Master Environmental Impact Report (MEIR). A general plan is a state-required, legal document, prepared in accordance with California Government Code Section 65300 et seq. The general plan provides guidance to the City regarding the physical form and character of Sacramento's land use and development, as well as the conservation of its resources. The current proposal is a technical update and refinement of the 2030 General Plan, which was a comprehensive revision adopted by the City in 2009. Policy 1.1.3 and Table 4-1, Program 2, of the 2030 General Plan require the City to conduct such an update every five years. In addition to technical policy updates, the technical review and update reset the planning horizon for the General Plan from 2030 to 2035. This MEIR does not evaluate the proposed changes in the 2035 General Plan, compared to the 2030 General Plan; rather, it evaluates the potential environmental impacts that would result from implementation of the proposed 2035 General Plan, as a whole, compared to existing conditions in the city.

2.1 PROJECT LOCATION

The City of Sacramento is located approximately 80 miles east of San Francisco and 85 miles west of Lake Tahoe in the great Central Valley at the northern end of the Sacramento/San Joaquin Delta and the confluence of the Sacramento and American rivers. Sacramento is the capital of the State of California and the seat of the County of Sacramento. Sacramento is a major transportation hub, the point of intersection of major highway and rail transportation routes that connect Sacramento to the San Francisco Bay area to the west, the Sierra Nevada range and state of Nevada to the east, city of Los Angeles to the south, and state of Oregon to the north (Exhibit 2-1).

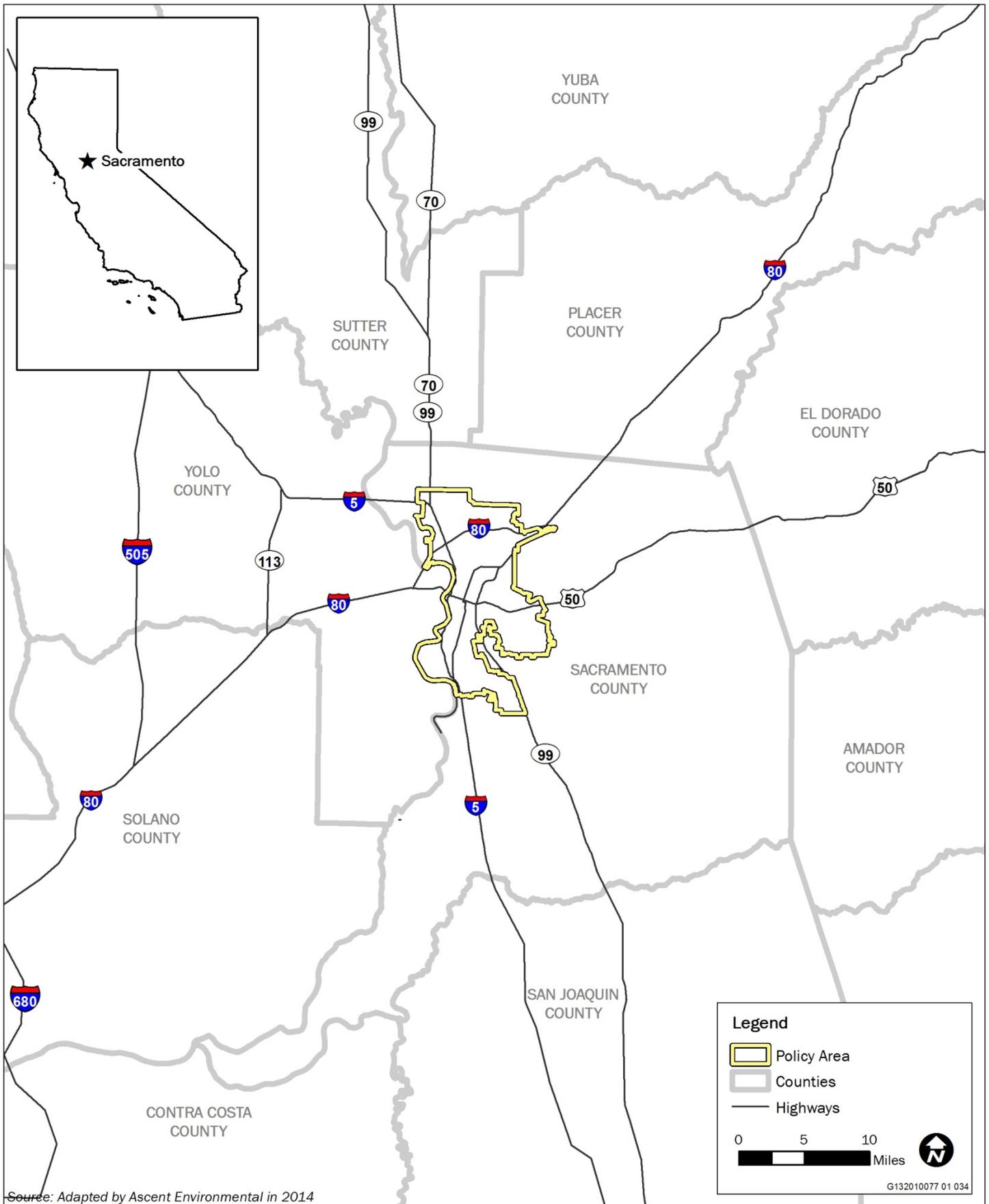
2.1.1 General Plan Policy Area

The 2035 General Plan encompasses an approximately 102-square-mile area that is referred to as the "Policy Area," as shown on Exhibit 2-2. The General Plan Policy Area covers an area in which the City has formally adopted policies, and areas for which the General Plan designates specific land uses. The General Plan Policy Area is generally contiguous with the city limit, but also includes additional areas within the City's sphere of influence for which the General Plan designates land use. These additional areas include the Panhandle Area, which is currently pending annexation, and the Camino Norte Area.

2.1.2 Community Plans

The City has adopted community plans for its Policy Area. The community plans are intended to implement the General Plan with more detailed guidance. The city's 10 community plan areas include the following:

- ▲ Arden-Arcade
- ▲ Central City
- ▲ Fruitridge/Broadway
- ▲ East Sacramento
- ▲ Land Park
- ▲ North Natomas
- ▲ North Sacramento
- ▲ Pocket
- ▲ South Area
- ▲ South Natomas



Source: Adapted by Ascent Environmental in 2014

G132010077 01 034

Exhibit 2-1

Project Location

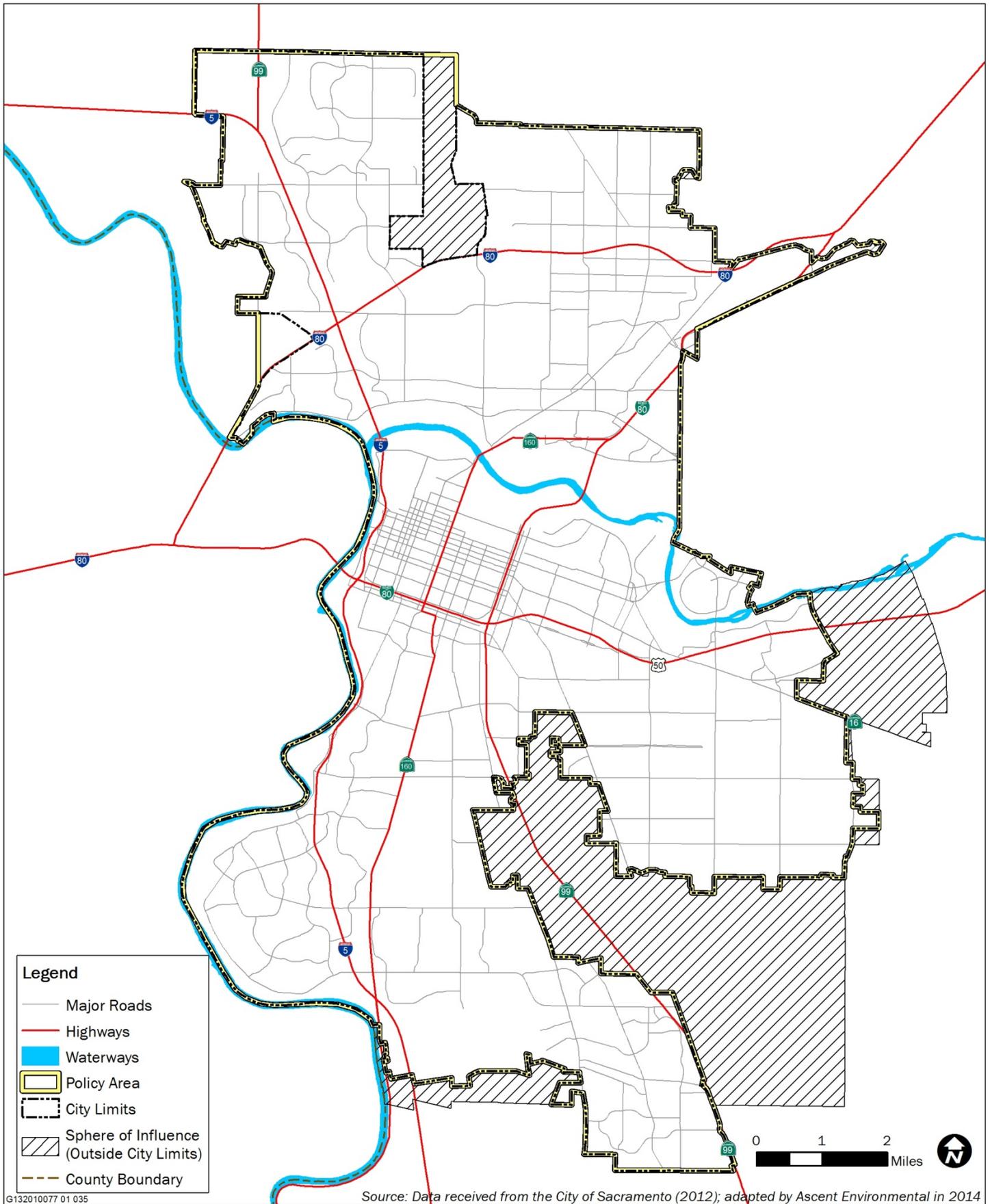


Exhibit 2-2

Policy Area

All land within the Policy Area is assigned to a community plan area, but several of the community plan areas extend beyond the Policy Area, including North Natomas, Arden-Arcade, East Sacramento, Fruitridge/Broadway, and South Area. Development within these areas is governed by the City of Sacramento General Plan and the 2030 Sacramento County General Plan.

2.1.1 Priority Investment Areas

The 2030 City of Sacramento General Plan identified several Focused Opportunity Areas, which are subareas of the city that have been identified in the community plans as important opportunities for future development through infill, reuse, or redevelopment. The community plans present a description for each Focused Opportunity Area including a vision statement, description of key issues, significant infrastructure challenges (e.g., water, sewer, storm drainage, mobility), and urban form concepts that are based on the citywide Land Use and Urban Form Diagram.

As part of this 2035 update, the City has focused attention on three of the Focused Opportunity Areas for future development and investment. These are identified as Priority Investment Areas and include the Central Business District, 65th North, and Arden Arcade (see Exhibit 2-3).

2.2 STATEMENT OF OBJECTIVES

In adopting the City of Sacramento 2035 General Plan, the City of Sacramento seeks to achieve the following objectives, consistent with the objectives stated in the current 2030 General Plan.

- ▲ **Character of Place.** Preserve and enhance Sacramento's quality of life and character as a city with diverse residential neighborhoods, an extensive urban forest, and role as the center of California's governance.
- ▲ **Smart Growth.** Encourage future growth in the city inward into existing urbanized areas and the central business district to foster infill development, as well as encourage density of development and integration of housing with commercial, office, and entertainment uses that fosters increased walking and reduced automobile use.
- ▲ **Live More Lightly.** Strive to meet the intent of Assembly Bill 32, California Global Warming Solutions Act of 2006, by reducing carbon emissions that contribute to global warming by encouraging "green" building practices, use of solar energy systems, and developing a land use pattern that supports walking, biking, and public transit.
- ▲ **Maintain a Vibrant Economy.** Support a diversity of business and employment opportunities by retaining existing and attraction of new businesses; maintain and expand recreational, arts, and cultural facilities; and nurture diverse community events and celebrations.
- ▲ **Healthy Cities.** Preserve and enhance land use patterns and densities that foster pedestrian and bicycle use and recreation through expanded parklands, sports, and athletic programming as well as provide incentives for expanding the availability of organic foods, and protecting residents from crime and natural or terrorist acts.
- ▲ **Sustainable Future.** Accommodate growth that protects important environmental resources as well as ensures long-term economic sustainability and health, and equity or social wellbeing for the entire community.

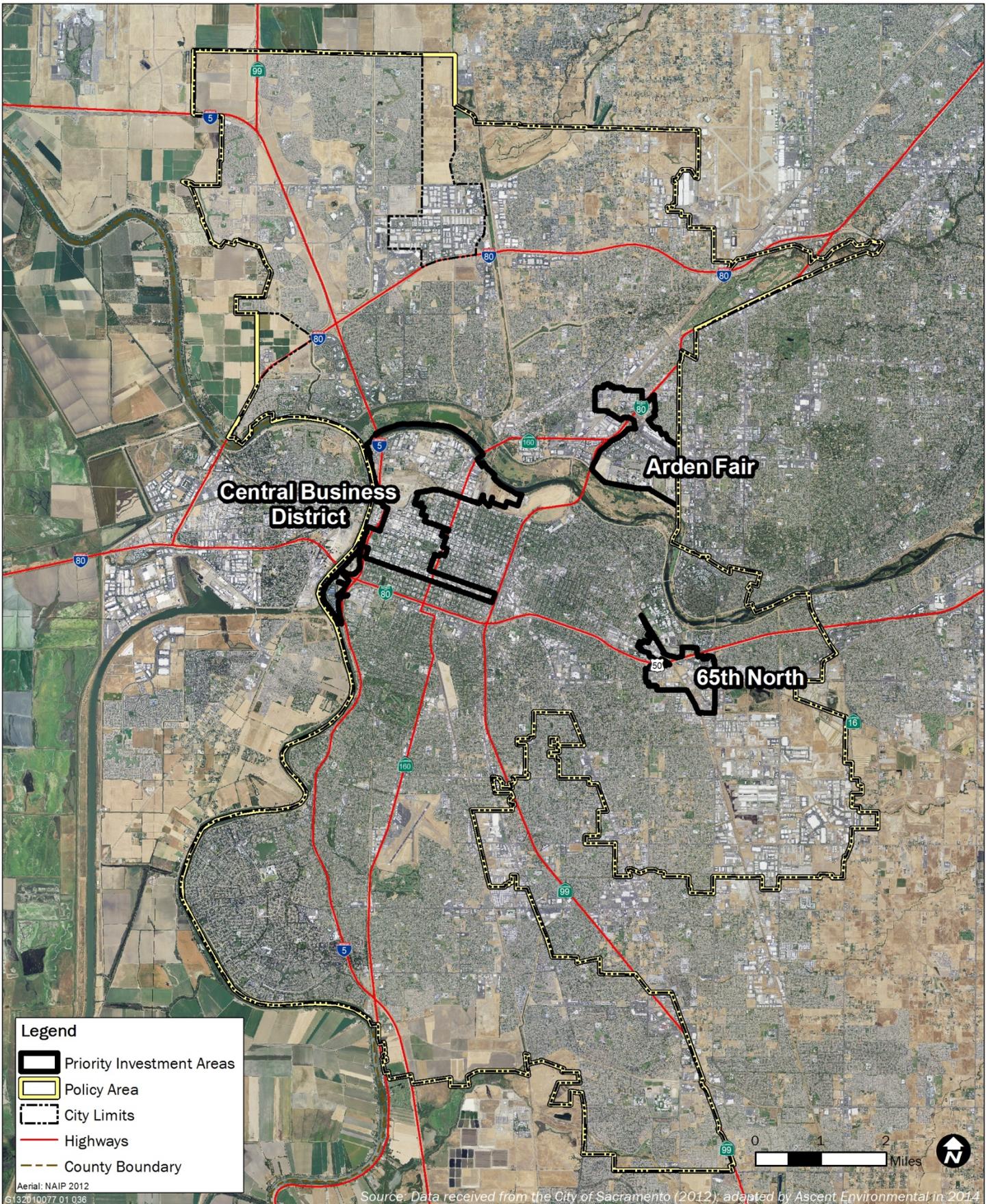


Exhibit 2-3

Priority Investment Areas

2.3 PROJECT CHARACTERISTICS

2.3.1 Sections and Components of the Proposed 2035 General Plan

The City of Sacramento 2035 General Plan is organized into the following chapters and sections:

Part I – Introduction

Part II – City Wide Goals and Policies

- ▲ Land Use and Urban Design
- ▲ Historic and Cultural Resources
- ▲ Economic Development
- ▲ Housing
- ▲ Mobility
- ▲ Utilities (water, wastewater, storm drainage, solid waste, energy resources, telecommunications)
- ▲ Education, Recreation and Culture (education, parks and recreation, libraries, arts and culture, museums, zoos, and other major destination attractions)
- ▲ Public Health and Safety (police, fire, hazardous materials, emergency response and disaster preparedness, public health and human services, code enforcement)
- ▲ Environmental Resources (water resources, biological resources, urban forest, agriculture, mineral resources, air quality, aesthetic resources)
- ▲ Environmental Constraints (seismic and geologic hazards, flooding, noise)

Part III – Community Plans and Special Study Areas

- ▲ Community Plans
- ▲ Arden Arcade Community Plan
- ▲ Central City Community Plan
- ▲ East Sacramento Community Plan
- ▲ Fruitridge Broadway Community Plan
- ▲ Land Park Community Plan
- ▲ North Natomas Community Plan
- ▲ North Sacramento Community Plan
- ▲ Pocket Community Plan
- ▲ South Area Community Plan
- ▲ South Natomas Community Plan
- ▲ Special Study Areas
- ▲ Natomas Joint Vision Study Area
- ▲ East Study Area
- ▲ Fruitridge Florin Study Area
- ▲ Arden Arcade Study Area
- ▲ Town of Freeport Study Area

Part IV – Administration and Implementation

The Administration and Implementation part of the proposed General Plan includes information on monitoring and maintaining the general plan as well as all the specific implementation programs per each section of Part II.

The proposed 2035 General Plan is a technical update of the 2030 General Plan. Elements, chapters, or sections of the existing General Plan have not been re-organized or comprehensively changed. In summary, the technical update focused on the following topical areas:

- ▲ **Update forecast for the planning timeframe through 2035:** The 2030 General Plan and MEIR evaluated projected growth through the year 2030. The significant slowdown in development activity since 2008 warranted a “dial down” of the housing, employment, and population projections to be consistent with SACOG’s Metropolitan Transportation Plan and an extension of the planning horizon to 2035.
- ▲ **Update of the Housing Element:** The City’s current Housing Element addresses for the period from 2008 to 2013. The new Housing Element covers the period from 2013 to 2021. The Housing Element was adopted by City Council in December 2013.
- ▲ **Update of Traffic Level of Service.** One of the primary policy changes in the proposed 2035 General Plan is the modification of Policy M 1.2.2 relating to level of service (LOS). This policy calls for the City to implement a flexible context-sensitive LOS standard. The City’s specific vehicle LOS thresholds have been defined based on community values with respect to modal priorities, land use context, economic development, and environmental resources and constraints. As such, the City will strive operate the roadway network at LOS D or better for vehicles during typical weekday AM and PM peak-hour conditions with exceptions where LOS E and F are allowed.
- ▲ **Compliance with recent flood risk legislation:** AB 162, SB 5, and the Central Valley Flood Protection Plan require a revised approach to consideration of flood risks in the General Plan and were recognized in the update of the 2035 General Plan policies.
- ▲ **Integration of the Climate Action Plan into the 2035 General Plan:** The Climate Action Plan strategies, measures, and actions that reduce greenhouse gas emissions have been incorporated into appropriate elements of the proposed General Plan. The General Plan also includes descriptions of climate change risks and policies, measures, and actions throughout the General Plan Elements to address adaptation to climate change impacts.

2.4 CHANGES TO THE PROJECT DESCRIPTION SINCE RELEASE OF THE DRAFT MEIR

The Project Description (Chapter 2) of the Draft MEIR summarized a proposed update to park policy, which would change the parkland service level standard. As the Project Description states, the updated policy would require the City to develop and maintain 1.75 acres (per 1,000 population) of neighborhood and community parks within the Central City and 3.5 acres (per 1,000 population) of neighborhood and community parks outside the Central City (ERC 2.2.4). These goals differ from the goals established by the 2030 General Plan, which were 5 acres of neighborhood and community parks and recreational facilities per 1,000 population for the entire city.

Several comments were received expressing concern regarding this change to the parkland service level standard. For policy reasons, the City is no longer proposing to change the park acreage service level standard as previously described and, instead, will retain the standard that is currently in effect. The service level policy, revised from the draft proposal, would now read as follows:

ERC 2.2.4 Park Acreage Service level. The City shall develop and maintain ~~1.75 acres~~ 5 acres of neighborhood and community parks and recreational facilities per 1,000 population. ~~in the Central City, and 3.5 acres of neighborhood and community parks and recreational facilities per 1,000 population in the remainder of the City.~~

Master Response 4.1.1 in Chapter 4 of this Final MEIR, “Responses to Comments,” includes a detailed discussion of this change, and Chapter 5 identifies the specific text changes to the Draft MEIR, including changes to Section 4.9, “Parks and Recreation.” As indicated in Chapters 4 and 5 of this Final MEIR, this modified park policy proposal does not result in substantial changes to the Draft MEIR’s analysis or conclusions.

2.5 APPROVALS

Approvals for the 2035 General Plan update include certification of this MEIR and approval of the 2035 General Plan by the City Council. Implementation of the proposed General Plan would require future project-level entitlements, approvals, and permits from City and other agencies for subsequent projects that are consistent with the 2035 General Plan.

2.5.1 Subsequent Approvals

If the 2035 General Plan is approved, the City may initiate amendments to the Planning and Development Code (Title 17) and other sections of the City Code to achieve consistency with the adopted General Plan. The Planning and Development Code would further define land use designations and the performance standards applicable to the land use designations. The Planning and Development Code would also establish the land use entitlement process applicable to the land use designations. Additional approvals may include:

- ▲ adoption of financing programs or fee programs for public infrastructure;
- ▲ rezoning of parcels to ensure consistency with the General Plan Land Use and Urban Form Diagram; and
- ▲ Planning and Development Code amendments to ensure consistency with the 2035 General Plan goals, policies and standards; Acquisition of land for public facilities, finance and construction of public infrastructure projects or consideration of private development requests for infrastructure projects such as transit and roadway improvements consistent with the General Plan Mobility Element, construction of parks, trails, infrastructure improvements (e.g., water distribution and treatment facilities, wastewater facilities, drainage improvements), other capital improvements, natural resource preservation and/or restoration.

The City would consider approval of various private development entitlement requests (e.g., specific plans, master plans, tentative subdivision maps, design review, use permits) that are consistent with the General Plan and its Land Use Map.

2.5.2 Use of this MEIR and Subsequent Projects

An MEIR provides the basis for streamlining the review of subsequent projects that are within its scope and consistent with the General Plan. Projects that are consistent with the analysis contained in this MEIR will not, in most cases, require extensive additional environmental review relating to cumulative effects, growth inducing effects, or irreversible significant effects on the environment before they can be approved. For projects that are consistent with the 2035 General Plan and that do not result in significant environmental effects that were not considered in this MEIR, it is anticipated that an Initial Study would be prepared to document consistency with the MEIR, after which a finding of conformance can be made. Other projects that are within the scope of the MEIR, but that have project-specific significant environmental effects that were not analyzed in the MEIR, would be addressed in either Mitigated Negative Declarations or Focused EIRs, as appropriate.

A list of Subsequent Projects is provided in Table 2-2 of the Draft MEIR.

3 LIST OF AGENCIES AND PERSONS COMMENTING

Table 3-1 provides a list of all comments received during the comment period and up to the public release of this Final MEIR. The table lists all comments by date received (where a date is available) and divides the comments by the type of commenter: agencies, individuals/businesses, and organizations.

Table 3-1 List of Commenting Agencies, Individuals, and Organizations		
Letter No.	Commenter	Date
AGENCIES		
A1	Sacramento Regional County Sanitation District (Regional San) Sarena Moore, SRCSD/SASD, Policy and Planning	8-25-14
A2	Central Valley Regional Water Quality Control Board (CVRWQCB) Trevor Cleak, Environmental Scientist	9-9-14
A3	California Department of General Services (DGS) Angela Verbaere, Assistant Chief, Asset Management Branch	9-15-14
A4	Sacramento Municipal Utility District (SMUD) Rob Ferrera, Environmental Specialist, Environmental Management Legislative & Regulatory Affairs	9-22-14
A5	Reclamation District 1000 (RD 1000) Paul Devereux, General Manager/District Engineer	9-23-14
A6	California Department of Transportation (Caltrans) Eric Fredericks, Chief, Office of Transportation Planning - South	9-24-14
A7	Delta Stewardship Council Cindy Messer, Deputy Executive Officer	9-24-14
A8	State of California – Natural Resources Agency, Delta Protection Commission Erik Vink, Executive Director	9-24-14
A9	Sacramento-Yolo Mosquito Vector Control District Kevin Combo, Ecological Management Department	9-25-14
A10	Sacramento Metropolitan Air Quality Management District Paul Philley, AICP, Associate Air Quality Planner/Analyst	9-25-14
A11	County of Sacramento, Regional Parks Department Dan Gonzales, Chairman, Sacramento County Recreation and Parks Commission	9-25-14
A12	State of California - Office of Planning and Research, State Clearinghouse and Planning Unit Scott Morgan, Director	9-25-14
A13	Sacramento Area Council of Governments (SACOG) Mike McKeever, Chief Executive Officer	10-6-14
A14	Sacramento Local Agency Formation Commission (Sacramento LAFCo) Don Lockhart, AICP, Assistant Executive Officer	10-6-14
A15	Mission Oaks Recreation and Park District Eric Milstein, Chair	10-6-14
INDIVIDUALS – BUSINESSES		
I1	Sharon Billings	No date
I2	Julia Brootkowski	No date
I3	Chris Brown	No date
I4	Lisa Kaplan	No date

Table 3-1 List of Commenting Agencies, Individuals, and Organizations		
Letter No.	Commenter	Date
I5	Beth Mahony	No date
I6	Brett Ramsdell	No date
I7	Diane Ramsdell	No date
I8	Monica Robinson	No date
I9	Rosemarie Ruggien	No date
I10	Katherine Taylor	No date
I11	Roberta Urbanik	No date
I12	Roberta Urbanik	9-7-14
I13	Caryne and Don Anglin	9-15-14
I14	Catherine Kungu	9-15-14
I15	Cat Bening Stadler	9-15-14
I16	Mark Stadler	9-15-14
I17	Lara Lance	9-16-14
I18	Lara Vincent Callesen	9-19-14
I19	Carri Cardenas	9-19-14
I20	Tina Cota	9-19-14
I21	Crystal Freeman	9-19-14
I22	Alan Haynes	9-19-14
I23	Lisa Haynes	9-19-14
I24	Kym Hoffman	9-19-14
I25	CJ Jones	9-19-14
I26	Paul Noreen	9-19-14
I27	Rajan Sharma	9-19-14
I28	Christina Theocarides	9-19-14
I29	Mayur Tilak	9-19-14
I30	Todd Williams	9-19-14
I31	Dan and Melanie Young	9-19-14
I32	Deborah Collet-Rugne	9-20-14
I33	Susie Pierce	9-20-14
I34	Ron Knight Jr.	9-20-14
I35	Peter Schofield	9-20-14
I36	Michael Campa	9-21-14
I37	Jacqueline Favrin	9-21-14
I38	Antonio Barrales	9-22-14
I39	Will Green	9-24-14
I40	Karen Jacques	9-24-14
I41	Judy Mc	9-24-14
I42	Martin Palomar	9-24-14

Table 3-1 List of Commenting Agencies, Individuals, and Organizations		
Letter No.	Commenter	Date
I43	Judy Robinson	9-24-14
I44	Ralph Sessa	9-24-14
I45	Cathy Stock	9-24-14
I46	Fatima Malik	9-25-14
I47	Jim Pahl and Jude Lamare	9-25-14
I48	Michael Saeltzer	9-25-14
ORGANIZATIONS		
01	Sacramento Tree Foundation Ray Tretheway, Executive Director	9-4-14
02	Sacramento Area Bicycle Advocates Jordan Lang, Project Analyst	9-10-14
03	Congress of California Seniors Henry L. Lacayo, State President	9-22-14
04	East Sacramento Preservation Neighborhood Association Michael Saeltzer, President	9-24-14
05	Same Letter as 05a	9-24-14
05a	East Sacramento Preservation Neighborhood Association Michael Saeltzer, President East Sacramento Partnerships for a Livable City Caroline Goddard, President Neighbors for a Better Sacramento Richard Lyndon, President Woodlake Neighbors Creating Transparency Jane Macaulay, President and individual signatories	9-25-14
06	Save the American River Association Steven Green, President	9-24-14
07	Capital City Preservation Trust Kathryn Tobias, MRP, JD., Chair	9-25-14
08	Community Groups & Individuals Multiple signatories	9-25-14
09	Parker Homes Neighborhood Association Gary Collier	9-25-14
010	Upper Land Park Neighbors Association Luree Stetson	9-25-14
011	Woodlake Neighbors Creating Transparency Jane Macaulay, President	9-25-14
012	United Auburn Indian Community of the Auburn Rancheria Gene Whitehouse, Chairman	10-8-14

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4 DRAFT MEIR COMMENTS AND RESPONSES

This chapter contains comment letters received on the Draft Master Environmental Impact Report (MEIR) during the public review period, which concluded on September 25, 2014, as well as all other written comments received prior to publication of this Final MEIR. Written responses are provided to comments that raise environmental issues, in conformance with Section 15088(a) of the State CEQA Guidelines. State CEQA Guidelines Section 15088(c) specifies that the focus of the responses to comments shall be on the disposition of significant environmental issues. Responses are not required in the MEIR to comments regarding the merits of the proposed 2035 General Plan or on issues not related to environmental impacts. When a comment does not pertain to the environmental issues analyzed in the Draft MEIR, does not ask a question about the adequacy of the analysis contained in the Draft MEIR, or does not challenge an element of or conclusion of the Draft MEIR, the response will note the comment for consideration by the City and provide additional information, where possible. Responses to comments related to the merits of the project or other issues not related to the environment will be provided as an attachment to the staff report to decision-makers for the approval hearing process.

4.1 MASTER RESPONSES

Several comments raised similar issues. The most common issues raised related to the proposed change in parks service level standards and neighborhood livability, especially regarding neighborhood traffic issues. Rather than responding individually to multiple comments on the same topic, master responses have been developed to address the comments comprehensively, as provided below. A reference to the master response is provided, where relevant, in responses to the individual comment.

4.1.1 Park Service Level Standard Master Response

The City of Sacramento has adopted goals and policies at the general plan level that provide guidance with regard to acquisition, construction, operation and maintenance of City parks. See Draft Master EIR pages 4.9-2 through 4.9-5. One of the policies that generated substantial comment appeared in the Education, Recreation and Culture Chapter (ERC) as ERC 2.2.4, which relates to park acreage service levels. The proposed policy provided:

- ▲ **Policy ERC 2.2.4. Park Acreage Service level.** The City shall develop and maintain 1.75 acres of neighborhood and community parks and recreational facilities per 1,000 population in the Central City, and 3.5 acres of neighborhood and community parks and recreational facilities per 1,000 population in the remainder of the City.

The park acreage targets in the proposed policy differed from the park acreage service levels in the 2030 General Plan, which identified the standard of 2.5 acres each for neighborhood and community serving parks, effectively establishing a standard of 5 acres per 1,000 citywide. See 2030 General Plan Policy ERC 2.2.3 and Table ERC 1.

The proposed policy was evaluated in the Draft Master EIR. In the discussion of Impact 4.9-1, the Draft MEIR concluded that the proposed policy would result in a less-than-significant effect for City areas outside the Central City, and a significant effect for the Central City. The Draft Master EIR proceeded to identify general plan provisions that would mitigate impacts in the Central City. These included:

- ▲ **Goal ERC 2.5**, which calls for securing adequate and reliable funding for the acquisition, development, rehabilitation, programming and maintenance of parks, community facilities, recreation facilities, trails, parkways and open spaces;
- ▲ **Implementation Program 2**, providing for a review and update of the Park Development Impact Fee Program to reflect the need for existing facility rehabilitation and renovation, higher park construction costs and development of active sports facilities;
- ▲ **Implementation Program 3**, calling for periodic updates to the Park Development Impact Fee Program and the Quimby parkland dedication program; and
- ▲ **Policy ERC 2.5.2**, calling for coordination with Sacramento County and other agencies and organizations to secure funding to patrol, maintain and enhance the American River and Sacramento River Parkways.

These policies and implementation programs were identified and evaluated, and the Draft MEIR concluded that implementation of the various programs and actions would reduce the level of significance to a less-than-significant level.

Comments received regarding this policy pointed to a variety of concerns. Commenters indicated the reduction in park acreage service level standards could result in fewer park acres dedicated, reduction in Quimby fees that would limit the City's ability to construct and rehabilitate parks, and increase demand on recreational facilities operated and maintained by others.

For policy reasons, the City is proposing to retain the park acreage service levels that are currently in effect. The service level policy, revised from the draft proposal, would now read as follows:

ERC 2.2.4 Park Acreage Service level. The City shall develop and maintain ~~1.75 acres~~ 5 acres of neighborhood and community parks and recreational facilities per 1,000 population. ~~in the Central City, and 3.5 acres of neighborhood and community parks and recreational facilities per 1,000 population in the remainder of the City.~~

The proposed revision to the park acreage service levels to coincide with standards currently in place would not result in any change in the impact analysis set forth in the Draft MEIR. For specific clarifying text changes to Draft MEIR Section 4.9 resulting from the change back to the currently adopted park acreage service level standards, please see Chapter 5 of this Final MEIR, "Corrections and Revisions to the Draft MEIR." The Draft MEIR analysis and comments relating to the proposed policy that would have reduced service levels, recognize that the process of acquiring, developing, maintaining and renovating parks in the community is a challenging process that requires ongoing attention. The proposed general plan provisions that call for ongoing review of programs and funding approaches, coordination with other agencies and organizations and a continued commitment to the overarching goal of protecting and promoting the public's health and well-being would still be adopted. In addition to the amendment to the changes to Policy ERC 2.2.4, above, the 2035 General Plan will be amended to include the following changes to Policy ERC 2.2.5:

ERC 2.2.5. Meeting Service Level Goal. The City shall require new residential development to either dedicate land for new parks, pay a fair share of the costs for new parks and recreation facilities, and/or pay a fair share for rehabilitation or renovation of existing parks and recreation facilities. For new development in urban areas where land dedication is not reasonably feasible (e.g., the Central City), the City shall require new development to either construct improvements or pay fees for existing park and recreation facility enhancements to address increased use. Additionally, the City will pursue creative park development opportunities such as joint use, regional park partnerships, private open space and acquisition of parkland with grant funding.

The changes to Policy ERC 2.2.5 will support a review of the various components of park financing, and in conjunction with the goals, policies and implementation measures identified in the Draft MEIR Impact 4.9-1 relating to Central City parks will ensure that any impact is less than significant.

4.1.2 Neighborhood Livability Master Response

Several comments raise concerns regarding neighborhood “livability” or “quality of life” within existing residential neighborhoods under 2035 General Plan conditions. These comments primarily express concern that a change in level of service (LOS) could conceivably increase traffic in residential neighborhoods or increased traffic on surrounding streets.

Livability, itself, is not an environmental issue requiring review under CEQA; however, CEQA does identify several environmental issue areas that relate to livability within a community, such as traffic, noise, and air quality, among others. As required by CEQA, the Draft MEIR identifies the physical changes to the environment that would occur with 2035 General Plan approval, mitigation that could reduce significant environmental impacts, and alternatives to the proposed 2035 General Plan. The Draft MEIR evaluates the various areas in which physical effects could occur. As an example, for traffic impacts CEQA requires the EIR to analyze whether the additional traffic that would be generated by the proposed 2035 General Plan would exceed the applicable thresholds of significance, and, if so, what steps may be taken to reduce such impacts. Transportation and Circulation issues are discussed and evaluated in Draft MEIR Section 4.12.

Several commenters indicated that the higher levels of traffic that would be allowed under the proposed change to LOS standard would affect livability because traffic on the more congested “exempt” roadways would cut through local residential streets. Although increased “cut-through traffic” may increase on residential streets, it would not typically occur at levels that would result in substantial LOS reduction (below LOS D). For this reason, the MEIR analysis focuses on major roadways including collectors and arterials that are most likely to experience increases in traffic that could result in significant impacts using the City’s LOS-based thresholds of significance. CEQA generally requires traffic-related impacts to be evaluated from the perspective of the “movers,” such as drivers, transit riders, bicyclists, and pedestrians, rather than from the perspective of adjacent residents and other occupants. CEQA requires evaluation of other environmental issues such as noise and air quality that encompass other livability issues that result from placing traffic near sensitive uses, such as residences and schools. The Draft MEIR includes analysis of air quality and noise issues in Sections 4.2 and 4.8, respectively.

The City’s 2035 General Plan Update includes goals and policies that relate to numerous aspects of life in the city, including neighborhood traffic. One important goal in considering traffic-related livability issues is proposed Goal M 4.3.

Goal M 4.3: Neighborhood Traffic. Enhance the quality of life within existing neighborhoods through the use of neighborhood traffic management and traffic calming techniques, while recognizing the City’s desire to provide a grid system that creates a high level of connectivity.

However, the purpose of the MEIR is not to resolve these various policy issues, but to provide, as required by CEQA, information for use by decision-makers regarding the potential for a proposed project to result in significant impacts to the environment in their determination of whether a project should be approved. The City Council, in considering the proposed 2035 General Plan, will evaluate the MEIR and the policies contained within the Plan.

The comments that raise concerns regarding ‘livability’ raise issues not related to the adequacy of the Draft MEIR, but rather related to the City’s proposed goals and policies and their implementation. These concerns are focused on policy and balancing of interests, and are properly committed to the deliberations of the City Council in its review of all of the project components, impacts, and consistency with the City’s long-term interests. The Draft MEIR provides relevant information, but is not the vehicle for a determination as to whether livability goals, however they may be described, have been achieved. These comments will be provided to City Council for their consideration regarding the merits of the proposed 2035 General Plan.

4.2 RESPONSES TO WRITTEN COMMENTS ON THE DRAFT MEIR

In the following discussion, each of the 75 comment letters identified in Chapter 3, “List of Agencies and Persons Commenting,” is reproduced in its entirety, followed by written responses. Consistent with Chapter 3, the comment letters are organized into three categories: Agency Letters, Individual/Business Letters, and Organization Letters. Each comment within the letters has been assigned an identification number for cross-referencing to a response. For example, the first comment in the first agency letter (A1) is Comment A1-1.

Agencies

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Letter
A1



REGIONALSAN
TAKING THE WASTE OUT OF WATER
Sacramento Regional County Sanitation District

Main Office
10060 Goethe Road
Sacramento, CA 95827-3553
Tel: 916.876.6000
Fax: 916.876.6160

Treatment Plant
8521 Laguna Station Road
Elk Grove, CA 95758-9550
Tel: 916.875.9000
Fax: 916.875.9068

Board of Directors
Representing:
County of Sacramento
County of Yolo
City of Citrus Heights
City of Elk Grove
City of Folsom
City of Rancho Cordova
City of Sacramento
City of West Sacramento

Prabhakar Somavaramu
District Engineer

Ruben Robles
Director of Operations

Christoph Dobson
Director of Policy & Planning

Karen Stoyanowski
Director of Internal Services

Joseph Maestretti
Chief Financial Officer

Claudia Goss
Public Affairs Manager

www.srcsd.com

Printed on Recycled Paper

August 25, 2014

Scott Johnson, Associate Planner
City of Sacramento, Community Development
Environmental Planning Services
300 Richards Blvd., 3rd Floor
Sacramento, CA 95811

Subject: Notice of Availability – Draft Master Environmental Impact Report for the City of Sacramento 2035 General Plan Update (LR12-003)(SCH#: 2012122006)

Dear Mr. Johnson:

Regional San (SRCSD) and the Sacramento Area Sewer District (SASD) have the following comments regarding the Notice of Availability – Draft Master Environmental Impact Report for the City of Sacramento 2035 General Plan Update:

Portions of the areas identified within the City of Sacramento’s General Plan will receive sewer service from SASD. The most current SASD planning document, the 2010 System Capacity Plan Update (SCP) was approved by the SASD Board of Directors in January 2012. The SCP can be found on the SASD website at <http://www.sacsewer.com/devres-standards.html>. Sewer studies, including points of connection and phasing information will need to be completed to fully assess the impacts of any project that has the potential to increase existing or future flow demands.

A1-1

For the areas where the City of Sacramento’s local sewer collection system provides service, conveyance to the Sacramento Regional Wastewater Treatment Plant (SRWTP) for treatment and disposal will be provided via Sump 2/2A and the SRCSD City Interceptor system. Cumulative impacts of the proposed project will need to be quantified by the project proponents to ensure wet and dry weather capacity limitations within Sump 2/2A and the City Interceptor system are not exceeded.

A1-2

On March 13, 2013, SRCSD approved the Wastewater Operating Agreement between the Sacramento Regional County Sanitation District and the City of Sacramento. The following flow limitations are outlined in this agreement:

Service Area	Flow Rate (MGD)
Combined Flows from Sump 2 and Sump 2A	60
Combined flows from Sumps 2, 2A, 21, 55, and 119	98
Total to City Interceptor of combined flows from Sumps 2, 2A, 21, 55, 119, and five trunk connections	108.5

A1-3

Customers receiving service from Regional San and SASD are responsible for rates and fees outlined within the latest SRCSD and SASD ordinances. Fees for connecting to the sewer system are set up to recover the capital investment of sewer and treatment facilities that serves new customers. The SASD ordinance is located on the SASD website at <http://www.sacsewer.com/ordinances.html>, and the SRCSD ordinance is located on the Regional San website at <http://www.srcsd.com/documents.php>.

SASD and Regional San are not land-use authorities. Projects identified within SASD and Regional San planning documents are based on growth projections identified by land-use authorities. Onsite and offsite impacts associated with constructing sanitary sewers facilities to provide service must be included in subsequent environmental impact reports.

A1-3
cont.

The SRWTP provides secondary treatment using an activated sludge process. Incoming wastewater flows through mechanical bar screens through a primary sedimentation process. This allows most of the heavy organic solids to settle to the bottom of the tanks. These solids are later delivered to the digesters. Next, oxygen is added to the wastewater to grow naturally occurring microscopic organisms, which consume the organic particles in the wastewater. These organisms eventually settle on the bottom of the secondary clarifiers. Clean water pours off the top of these clarifiers and is chlorinated, removing any pathogens or other harmful organisms that may still exist. Chlorine disinfection occurs while the wastewater travels through a two mile "outfall" pipeline to the Sacramento River, near the town of Freeport, California. Before entering the river, sulfur dioxide is added to neutralize the chlorine. The design of the SRWTP and collection system was balanced to have SRWTP facilities accommodate some of the wet weather flows while minimizing idle SRWTP facilities during dry weather. The SRWTP was designed to accommodate some wet weather flows while the storage basins and interceptors were designed to accommodate the remaining wet weather flows.

A NPDES Discharge Permit was issued to Regional San by the Central Valley Regional Water Quality Control Board (Water Board) in December 2010. In adopting the new Discharge Permit, the Water Board required Regional San to meet significantly more restrictive treatment levels over its current levels. Regional San believed that many of these new conditions go beyond what is reasonable and necessary to protect the environment, and appealed the permit decision to the State Water Resources Control Board (State Board). In December 2012, the State Board issued an Order that effectively upheld the Permit. As a result, Regional San filed litigation in California Superior Court. Regional San and the Water Board agreed to a partial settlement in October 2013 to address several issues and a final settlement on the remaining issues were heard by the Water Board in August 2014. Regional San has begun the necessary activities, studies and projects to meet the permit conditions. The new treatment facilities to achieve the permit and settlement requirements must be completed by May 2021 for ammonia and nitrate and May 2023 for the pathogen requirements

A1-4

Regional San currently owns and operates a 5-mgd Water Reclamation (WRF) that has been producing Title 22 tertiary recycled since 2003. The WRF is located within the SRWTP property in Elk Grove. A portion of the recycled water is used by Regional San at the SRWTP and the rest is wholesaled to the Sacramento County Water Agency (SCWA). SCWA retails the recycled water, primarily for landscape irrigation use, to select customers in the City of Elk Grove. It should be noted that Regional San currently does not have any planned facilities that could provide recycled water to the proposed project or its vicinity. Additionally, Regional San is not a water purveyor and any potential use of recycled water in the project area must be coordinated between the key stakeholders, e.g. land use jurisdictions, water purveyors, users, and the recycled water producers.

If you have any questions regarding these comments, please contact me at 916-876-9994

Sincerely,



Sarena Moore
SRCSD/SASD
Policy and Planning

Cc: SRCSD Development Services, SASD Development Services, Michael Meyer, Dave Ocnosak, Christopher Dobson

Letter	Sacramento Regional County Sanitation District (Regional San)
A1	Sarena Moore, SRCSD/SASD, Policy and Planning
Response	8-25-14

- A1-1 The commenter provides information regarding sewer studies that may be required for individual projects as part of SASD's general requirements. This information does not conflict with the information provided in Section 4.11 of the Draft MEIR. The commenter does not raise issues regarding the adequacy of the Draft MEIR. No further response is necessary.
- A1-2 The commenter identifies the need for cumulative impact evaluation regarding capacity for conveyance facilities. As stated in the Draft MEIR (p. 4.11-14), the Sacramento Regional County Sanitation District (SRCSD) has a program in place to continually evaluate demand/capacity needs, and the master planning effort provides the flexibility to respond to changes in demand that can be anticipated in advance of planned improvements so that capacity issues are addressed in a timely and cost-effective manner. Master planning efforts that would identify necessary improvement in capacity to accommodate city growth beyond the 2020 Master Plan timeframe would be initiated well in advance of 2035. To fund expansions to the conveyance systems, the SRCSD requires a regional connection fee be paid to the District for any users connecting to or expanding sewer collection systems (SRCSD Ordinance No. SRCSD-0043). Therefore, the Draft MEIR has evaluated impacts (which are intrinsically cumulative) related to SRCSD conveyance facilities.
- A1-3 The commenter provides information regarding customer connection fees. The comment does not raise environmental issues or issues related to the adequacy of the Draft MEIR. No further response is necessary.
- A1-4 Comment A1-4 provides additional detail regarding National Pollution Discharge Elimination System (NPDES) permit requirements, which will lead to upgrading the Sacramento Regional Wastewater Treatment Plant (SRWTP). The information provided is consistent with the discussion of the SRWTP on page 4.11-16 of the Draft MEIR. This comment does not suggest that the Draft MEIR discussion is inaccurate, nor that any additional environmental impacts should be considered. The City acknowledges the substantial effort that has gone into developing the NPDES permit requirements, as well as the effort that will be employed by Regional San to construct facilities so the SRWTP will comply with the permit.



Letter
A2

Central Valley Regional Water Quality Control Board

9 September 2014

Scott Johnson
City of Sacramento
300 Richards Boulevard
Sacramento, CA 95811

CERTIFIED MAIL
7013 1710 0002 3644 7754

COMMENTS TO REQUEST FOR REVIEW FOR THE DRAFT ENVIRONMENTAL IMPACT REPORT, 2035 GENERAL PLAN PROJECT, SCH NO. 2012122006, SACRAMENTO COUNTY

Pursuant to the State Clearinghouse's 11 August 2014 request, the Central Valley Regional Water Quality Control Board (Central Valley Water Board) has reviewed the *Request for Review for the Draft Environmental Impact Report* for the 2035 General Plan Project, located in Sacramento County.

Our agency is delegated with the responsibility of protecting the quality of surface and groundwaters of the state; therefore our comments will address concerns surrounding those issues.

Construction Storm Water General Permit

Dischargers whose project disturb one or more acres of soil or where projects disturb less than one acre but are part of a larger common plan of development that in total disturbs one or more acres, are required to obtain coverage under the General Permit for Storm Water Discharges Associated with Construction Activities (Construction General Permit), Construction General Permit Order No. 2009-009-DWQ. Construction activity subject to this permit includes clearing, grading, grubbing, disturbances to the ground, such as stockpiling, or excavation, but does not include regular maintenance activities performed to restore the original line, grade, or capacity of the facility. The Construction General Permit requires the development and implementation of a Storm Water Pollution Prevention Plan (SWPPP).

For more information on the Construction General Permit, visit the State Water Resources Control Board website at:
http://www.waterboards.ca.gov/water_issues/programs/stormwater/constpermits.shtml.

A2-1



2035 General Plan Project
Sacramento County

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9 September 2014

Phase I and II Municipal Separate Storm Sewer System (MS4) Permits¹

The Phase I and II MS4 permits require the Permittees reduce pollutants and runoff flows from new development and redevelopment using Best Management Practices (BMPs) to the maximum extent practicable (MEP). MS4 Permittees have their own development standards, also known as Low Impact Development (LID)/post-construction standards that include a hydromodification component. The MS4 permits also require specific design concepts for LID/post-construction BMPs in the early stages of a project during the entitlement and CEQA process and the development plan review process.

A2-2

For more information on which Phase I MS4 Permit this project applies to, visit the Central Valley Water Board website at:

http://www.waterboards.ca.gov/centralvalley/water_issues/storm_water/municipal_permits/.

For more information on the Phase II MS4 permit and who it applies to, visit the State Water Resources Control Board at:

http://www.waterboards.ca.gov/water_issues/programs/stormwater/phase_ii_municipal.shtml

Industrial Storm Water General Permit

Storm water discharges associated with industrial sites must comply with the regulations contained in the Industrial Storm Water General Permit Order No. 97-03-DWQ.

A2-3

For more information on the Industrial Storm Water General Permit, visit the Central Valley Water Board website at:

http://www.waterboards.ca.gov/centralvalley/water_issues/storm_water/industrial_general_permits/index.shtml.

Clean Water Act Section 404 Permit

If the project will involve the discharge of dredged or fill material in navigable waters or wetlands, a permit pursuant to Section 404 of the Clean Water Act may be needed from the United States Army Corps of Engineers (USACOE). If a Section 404 permit is required by the USACOE, the Central Valley Water Board will review the permit application to ensure that discharge will not violate water quality standards. If the project requires surface water drainage realignment, the applicant is advised to contact the Department of Fish and Game for information on Streambed Alteration Permit requirements.

A2-4

If you have any questions regarding the Clean Water Act Section 404 permits, please contact the Regulatory Division of the Sacramento District of USACOE at (916) 557-5250.

¹ Municipal Permits = The Phase I Municipal Separate Storm Water System (MS4) Permit covers medium sized Municipalities (serving between 100,000 and 250,000 people) and large sized municipalities (serving over 250,000 people). The Phase II MS4 provides coverage for small municipalities, including non-traditional Small MS4s, which include military bases, public campuses, prisons and hospitals.

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9 September 2014

Clean Water Act Section 401 Permit – Water Quality Certification

If an USACOE permit, or any other federal permit, is required for this project due to the disturbance of waters of the United States (such as streams and wetlands), then a Water Quality Certification must be obtained from the Central Valley Water Board prior to initiation of project activities. There are no waivers for 401 Water Quality Certifications.

A2-5

Waste Discharge Requirements

If USACOE determines that only non-jurisdictional waters of the State (i.e., “non-federal” waters of the State) are present in the proposed project area, the proposed project will require a Waste Discharge Requirement (WDR) permit to be issued by Central Valley Water Board. Under the California Porter-Cologne Water Quality Control Act, discharges to all waters of the State, including all wetlands and other waters of the State including, but not limited to, isolated wetlands, are subject to State regulation.

A2-6

For more information on the Water Quality Certification and WDR processes, visit the Central Valley Water Board website at:

http://www.waterboards.ca.gov/centralvalley/help/business_help/permit2.shtml.

Low or Limited Threat General NPDES Permit

If the proposed project includes construction dewatering and it is necessary to discharge the groundwater to waters of the United States, the proposed project will require coverage under a National Pollutant Discharge Elimination System (NPDES) permit. Dewatering discharges are typically considered a low or limited threat to water quality and may be covered under the General Order for *Dewatering and Other Low Threat Discharges to Surface Waters* (Low Threat General Order) or the General Order for *Limited Threat Discharges of Treated/Untreated Groundwater from Cleanup Sites, Wastewater from Superchlorination Projects, and Other Limited Threat Wastewaters to Surface Water* (Limited Threat General Order). A complete application must be submitted to the Central Valley Water Board to obtain coverage under these General NPDES permits.

A2-7

For more information regarding the Low Threat General Order and the application process, visit the Central Valley Water Board website at:

http://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/general_orders/r5-2013-0074.pdf

For more information regarding the Limited Threat General Order and the application process, visit the Central Valley Water Board website at:

http://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/general_orders/r5-2013-0073.pdf

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9 September 2014

If you have questions regarding these comments, please contact me at (916) 464-4684 or tleak@waterboards.ca.gov.



Trevor Cleak
Environmental Scientist

cc: State Clearinghouse Unit, Governor's Office of Planning and Research, Sacramento

Letter	Central Valley Regional Water Quality Control Board (CVRWQCB)
A2	Trevor Cleak, Environmental Scientist
Response	9-9-14

- A2-1 The comment generally describes the Construction General Permit requirements. The comment does not raise issues related to the adequacy of the Draft MEIR. The Draft MEIR Section 4.7, "Hydrology, Water Quality, and Flooding," (p. 4.7-13) describes compliance with NPDES requirements, including General Construction Permit. Please refer to Draft MEIR Section 4.7 for more information.
- A2-2 The comment generally describes Phase I and II MS4 permit requirements. The comment does not raise issues related to the adequacy of the Draft MEIR. NPDES permits and the requirements for development are described throughout Draft MEIR Section 4.7. Please refer to Draft MEIR Section 4.7 for more information.
- A2-3 The comment generally describes the requirement for industrial sites to comply with the Industrial Storm Water General Permit. The comment does not raise issues related to the adequacy of the Draft MEIR. The Industrial Storm Water Permit is described in Draft MEIR Section 4.7, "Hydrology, Water Quality, and Flooding," (p. 4.7-15). Please refer to Draft MEIR Section 4.7 for more information.
- A2-4 The comment generally describes the requirements of the Clean Water Act Section 404 Permit. The comment does not raise issues related to the adequacy of the Draft MEIR. Section 404 of the Clean Water Act and associated permits are discussed in the Draft MEIR Section 4.3, "Biological Resources," and also within the Background Report, included as Appendix C to the Draft MEIR (see Section 6, "Environmental Resources"). Please refer to Draft MEIR Section 4.3 for more information.
- A2-5 The comment generally describes the requirements of the Clean Water Act Section 401 Certification. The comment does not raise issues related to the adequacy of the Draft MEIR. The Background Report, included as Appendix C of the Draft MEIR, includes a discussion of Section 401 of the Clean Water Act and the certification requirements. See page 6-34 of the Background Report.
- A2-6 The comment generally describes the Waste Discharge Requirement (WDR) permit issued by the Central Valley Water Board. The comment does not raise issues related to the adequacy of the Draft MEIR. The Background Report, included as Appendix C of the Draft MEIR, includes a discussion of WDR and permit requirements. See page 4-5 of the Background Report.
- A2-7 The comment generally describes the Low or Limited Threat General NPDES Permit. The comment does not raise issues related to the adequacy of the Draft MEIR. The Background Report, included as Appendix C of the Draft MEIR, includes a discussion of construction dewatering permits and requirements. See page 6-52 of the Background Report.



Governor Edmund G. Brown

Letter
A3

September 15, 2014

Mr. Scott Johnson, Associate Planner
City of Sacramento, Community Development Department
300 Richards Boulevard, Third Floor
Sacramento, CA 95811

Dear Mr. Johnson:

Thank you for the opportunity to review the Draft Master Environmental Impact Report (MEIR) for the City of Sacramento 2035 General Plan Update. The Department of General Services (DGS) has the following comments for your consideration.

Established by statute, Government Code Sections 8160-8169.7, the Capitol Area Plan is the official master plan for development on state-owned land in the central city. The Land Use, Population, and Housing portion of the MEIR document, Section 3.2, includes policies for Land Use and Urban Design Elements. The Capitol Area Plan designates land uses on state-owned land in the Capitol Area and we recommend it be identified accordingly within this section of the document.

DGS agreed to fund mitigation for additional sewage flows from the Central Plant and the West End Office Complex (when built). Funding has been provided by DGS for additional sewage flows related to the Central Plant, however, the authority to construct the West End Office Complex has been rescinded. DGS has not, however, made a blanket agreement to "mitigate the additional sewage flows from state facilities by funding certain new pipeline construction in the combined system as new state facilities are constructed", as reflected in Appendix C – Background Report, Chapter 4, Utilities, Existing Conditions - Combined Sewer/Storm Drain Area, Page 4-5, Item No. 3, of the Draft MEIR. Commitments regarding funding by DGS would be made on a project-by-project basis and payment of any and all fees should be paid based on the development's fair share of costs to implement such project, which should be reflected in the MEIR document text.

A3-1

We appreciate your consideration of our comments. If you have any questions, please contact Cathy Buck of my staff at (916) 375-4888.

Sincerely,

Angela Verbaere
Assistant Chief
Asset Management Branch

cc: Cathy Buck, Supervising Real Estate Officer, Real Estate Services Division,
Asset Management Branch

Real Estate Services Division/Asset Management Branch | State of California | Government Operations Agency
707 3rd Street, 5th Floor | West Sacramento, CA 95605 | t 916.376.1800 f 916.376.1833

Letter	California Department of General Services (DGS)
A3	Angela Verbaere, Assistant Chief, Asset Management Branch
Response	9-15-14

A3-1 The commenter identifies a needed correction to the Background Report, included as Appendix C of the Draft MEIR. The commenter indicates that DGS has not accepted a blanket agreement to mitigate additional sewage flows as new state facilities are constructed. In response to this comment, the text on page 4-5 of the Background Report is revised as follows:

3. The Capitol Area Plan is a master plan of proposed state facilities in the greater downtown area. ~~The State Department of General Services has agreed to mitigate the additional sewage flows from State facilities by funding certain new pipeline construction in the combined system as new State facilities are constructed.~~ Mitigation for the increased sewer flows from the Capitol Area Plan projects contained in the Capitol Area Plan will be made on a project-by-project basis. Payment of any and all fees by the State Department of General Services (DGS) will be paid based on the development's fair share of costs to implement such a project.

This text revision to the Background Report constitutes a minor clarification and does not change the analysis or conclusions of the Draft MEIR.

Powering forward. Together

Letter
A4



September 22, 2014

Mr. Scott Johnson, Associate Planner
City of Sacramento Community Development Department
300 Richards Blvd., 3rd Floor
Sacramento, CA 95811
(916) 808-5842;
E-mail: srjohnson@cityofsacramento.org.

Subject: Draft Master Environmental Impact Report (Draft MEIR) for the City of Sacramento
2035 General Plan Update

Dear Mr. Johnson,

The Sacramento Municipal Utility District (SMUD) appreciates the opportunity to provide comments on Draft Master Environmental Impact Report (Draft MEIR) for the City of Sacramento 2035 General Plan Update. SMUD is the primary energy provider for Sacramento County and the proposed project location. SMUD's vision is to empower our customers with solutions and options that increase energy efficiency, protect the environment, reduce global warming, and lower the cost to serve our region. As a Responsible Agency, SMUD aims to ensure that the proposed project limits the potential for significant environmental effects on SMUD facilities, employees, and customers.

It is our desire that the City of Sacramento 2035 General Plan Update will acknowledge any policy impacts related to the following:

- Overhead and or underground transmission and distribution line easements
- Electrical load needs/ requirements
- Energy Efficiency
- Utility line routing
- Climate Change

A4-1

Based on our review of the Draft MEIR and our understanding of the proposed update, SMUD would very much welcome the opportunity to further discuss the issues pertaining to the above. Please ensure that the information included in this response is conveyed to the appropriate audience.

A4-2



Environmental leadership is a core value of SMUD and we look forward to collaborating with you on this plan update. Again, we appreciate the opportunity to provide input on the Draft MEIR. If you have any questions regarding this letter, please contact Rob Ferrera, SMUD Environmental Specialist at (916) 732-6676.

Sincerely,



Rob Ferrera
Environmental Specialist
Environmental Management
Legislative & Regulatory Affairs
Sacramento Municipal Utility District

Cc: Pat Durham
Steve Johns
David Fuke
Joseph Schofield

**Letter
A4
Response****Sacramento Municipal Utility District (SMUD)**
Rob Ferrera, Environmental Specialist, Environmental Management
Legislative & Regulatory Affairs
9-22-14

- A4-1 The comment indicates that the proposed 2035 General Plan update should acknowledge “policy impacts” related to several issues, including transmission line easements, electrical load requirements, energy efficiency, utility line routing, and climate change. The proposed 2035 General Plan includes policies that address the issues identified in the comment. Draft MEIR Section 4.11.5, “Electricity and Natural Gas,” provides the applicable proposed General Plan policies related to coordination with utility providers and renewable energy. The Draft MEIR includes a discussion regarding energy efficiency conservation (see Section 6.3, “Energy Conservation”) as well as a section that addresses climate change impacts and greenhouse gas (GHG) emissions (see Section 4.14, “Climate Change”). The comment does not identify any environmental impact topics or issues related to the adequacy of the Draft MEIR and no further response is required.
- A4-2 The comment requests further opportunities to discuss the issues identified above in comment A4-1 and requests that the information included in the response be conveyed to the appropriate audience. The comment does not identify any issues related to the adequacy of the Draft MEIR. SMUD is included in the City’s application review process for applicable projects and the City will continue to include SMUD for review of applicable development applications. Policy U 6.1.1 states that the City shall continue to work closely with local utility providers to ensure that adequate electricity and natural gas services are available for existing and newly developing areas. Responses to this comment will be provided to the City Council for review.

- 4. Pg. 2-203; as part of the New Development and New Development Design policy we suggest you incorporate the following:
 - a. Cooperate and coordinate with LMAs on the design of interior drainage systems and require improvements to the system to mitigate impacts of any new development on the system and support funding for the continued operation and maintenance of the system by the benefitting property owners. Require compliance with any standards of the LMA.
 - b. Work with LMA's on the design of urban development to optimize efficient operation and maintenance of perimeter levees, interior levees, drainage canals, and pump stations.

- 5. Pg. 2-204; as part of the policies on access related to flood control/drainage facilities we suggest you include:
 - a. Design urban roads, bridges and other infrastructure to minimize impact on the operations and maintenance of the LMAs drainage canals, pump stations and interior/perimeter levees and allow for access to these facilities including large equipment and emergency response vehicles.
- 6. Pg. 2-205; Does the City encourage flood insurance for all residents or just those in the floodplain and/or protected by levees?
- 7. Pg. 2-212; for Program 5 include RD 1000 (for Natomas) in the list of agencies to work with for implementing 200-year flood protection.
- 8. Pg. 2-213; for Program 10 include annual reviews of Mutual Aid agreements with LMA's for flood patrol and emergency response
- 9. Pg. 3-127; The NNCPA describes basins to detain urban runoff before releasing it slowly into the Sacramento River. The City's detention basins pump the water into the RD 1000 drainage system which pumps the water into the Sacramento River and Natomas East Main Drain Canal. Also not sure what is being referred to with the "isolated area between the two canals for wildlife and plant habitat".
- 10. Pg. 3-127; the Flood Control section describes providing a minimum of 100-year protection; the State Plan of Flood Control requires 200-year as stated earlier in the document. Also, it is unclear if the existing interior system of drainage canals and pump stations operated by RD 1000 also needs to provide 200-year flood protection? The original North Natomas Drainage Plan was designed to provide 100-year flood protection with freeboard.
- 11. Pg. 3-128; the flood that changed the FEMA maps was in February 1986
- 12. Pg. 3-152; First bullet should note multipurpose use for drainage corridors are subject to operation and maintenance needs and standards of RD 1000 for those corridors under our responsibility.
- 13. Pg. 3-152; Policy NN.U.1.3 City should support local funding to insure proper operation and maintenance of the drainage system by benefitting properties. Also, RD 1000 and the City entered into a Joint Community Facilities Agreement for drainage improvements in the North Natomas Area. The City shall provide funds necessary to complete the improvements identified in the agreement and any other improvements identified which are necessary to mitigate the impacts of

A5-4

A5-5

A5-6

A5-7

A5-8

A5-9

A5-10

A5-11

A5-12

A5-13

- the Natomas CDP on the existing drainage system consistent with the RD 1000 standards or as required by federal and state agencies
14. Pg. 3-152; Policy NN.U.1.4 should state the Natomas CPD plans must also be consistent with RD 1000 standards and drainage plans. Also, the policy suggests any future increase in design flows is the responsibility of the agency where they originate. However, in many cases increases in design flows are the result of new and/or better meteorological information, climate change or new hydraulic/hydrologic standards and therefore the responsibility of the existing developed areas.
 15. Pg. 3-153; No specific flood control policies are identified; however, the City needs to determine if the North Natomas drainage plan is subject to the 200-year flood protection requirement from the State Plan of Flood Control and if the current system as designed meets that standard.
 16. Pg. 3-260; The policies for development in the “Riverfront District” should note that any construction, plantings or other encroachments on or adjacent to the levee (including waterward to the Sacramento River) require a permit from the State Central Valley Flood Protection Board, an endorsement by RD 1000, and are subject to the review and approval of the Army Corps of Engineers who may collectively determine that certain uses are not compatible with their flood control responsibilities. Any such encroachment must not impact the flood protection provided by the levee or impede the operations and maintenance thereof and are subject to the standards of the respective flood control organizations.

A5-13
cont.

A5-14

A5-15

A5-16

We appreciate the opportunity to review and provide our comments on the Draft 2035 General Plan Update Master EIR. We look forward to our continued positive relationship with the City in providing flood control and drainage services to the portions of the City within the Natomas Basin. If you have any questions, please contact me at 916-922-1449 or via e-mail at pdevereux@rd1000.org.

Sincerely,



Paul Devereux
General Manager/District Engineer

- cc Tim Washburn (SAFCA)
Tim Kerr (American River FCD)
Bill Busath (City Utilities)

Letter A5 Response	Reclamation District 1000 (RD 1000) Paul Devereux, General Manager/District Engineer 9-23-14
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- A5-1 The commenter recommends changes to the proposed 2035 General Plan policies. The comment does not raise environmental issues or issues related to the adequacy of the Draft MEIR, and no further response is necessary under CEQA. This comment will be provided to the decision makers for consideration; City staff's response to this comment will be included as an appendix to the staff report.
- A5-2 The commenter recommends changes to the proposed 2035 General Plan policies. The comment does not raise environmental issues or issues related to the adequacy of the Draft MEIR, and no further response is necessary under CEQA. This comment will be provided to the decision makers for consideration; City staff's response to this comment will be included as an appendix to the staff report.
- A5-3 The commenter recommends changes to the proposed 2035 General Plan policies. The comment does not raise environmental issues or issues related to the adequacy of the Draft MEIR, and no further response is necessary under CEQA. This comment will be provided to the decision makers for consideration; City staff's response to this comment will be included as an appendix to the staff report.
- A5-4 The commenter recommends changes to the proposed 2035 General Plan policies. The comment does not raise environmental issues or issues related to the adequacy of the Draft MEIR, and no further response is necessary under CEQA. This comment will be provided to the decision makers for consideration; City staff's response to this comment will be included as an appendix to the staff report.
- A5-5 The commenter recommends changes to the proposed 2035 General Plan policies. The comment does not raise environmental issues or issues related to the adequacy of the Draft MEIR, and no further response is necessary under CEQA. This comment will be provided to the decision makers for consideration; City staff's response to this comment will be included as an appendix to the staff report.
- A5-6 The commenter inquires regarding 2035 General Plan policies related to flood insurance. The City encourages all residences located within the 200-year floodplain (which covers most of the city) to purchase flood insurance. The comment does not raise environmental issues or issues related to the adequacy of the Draft MEIR, and no further response is necessary under CEQA. This comment will be provided to the decision makers for consideration; City staff's response to this comment will be included as an appendix to the staff report.
- A5-7 The commenter recommends changes to the proposed 2035 General Plan policies. The comment does not raise environmental issues or issues related to the adequacy of the Draft MEIR, and no further response is necessary under CEQA. This comment will be provided to the decision makers for consideration; City staff's response to this comment will be included as an appendix to the staff report.
- A5-8 The commenter recommends changes to the proposed 2035 General Plan policies. The comment does not raise environmental issues or issues related to the adequacy of the Draft MEIR, and no further response is necessary under CEQA. This comment will be provided to the decision makers for consideration; City staff's response to this comment will be included as an appendix to the staff report.

- A5-9 The commenter recommends changes to text in Part 3 of the 2035 General Plan “Community Plan Areas and Special Design Areas.” The comment does not raise environmental issues or issues related to the adequacy of the Draft MEIR, and no further response is necessary under CEQA. This comment will be provided to the decision makers for consideration; City staff’s response to this comment will be included as an appendix to the staff report.
- A5-10 The commenter recommends changes to text in Part 3 of the 2035 General Plan “Community Plan Areas and Special Design Areas.” The comment does not raise environmental issues or issues related to the adequacy of the Draft MEIR, and no further response is necessary under CEQA. This comment will be provided to the decision makers for consideration; City staff’s response to this comment will be included as an appendix to the staff report.
- A5-11 The commenter recommends changes to text in Part 3 of the 2035 General Plan “Community Plan Areas and Special Design Areas.” The comment does not raise environmental issues or issues related to the adequacy of the Draft MEIR, and no further response is necessary under CEQA. This comment will be provided to the decision makers for consideration; City staff’s response to this comment will be included as an appendix to the staff report.
- A5-12 The commenter recommends changes to text in Part 3 of the 2035 General Plan “Community Plan Areas and Special Design Areas.” The comment does not raise environmental issues or issues related to the adequacy of the Draft MEIR, and no further response is necessary under CEQA. This comment will be provided to the decision makers for consideration; City staff’s response to this comment will be included as an appendix to the staff report.
- A5-13 The commenter recommends changes to the proposed 2035 General Plan policies. The comment does not raise environmental issues or issues related to the adequacy of the Draft MEIR, and no further response is necessary under CEQA. This comment will be provided to the decision makers for consideration; City staff’s response to this comment will be included as an appendix to the staff report.
- A5-14 The commenter recommends changes to the proposed 2035 General Plan policies. The comment does not raise environmental issues or issues related to the adequacy of the Draft MEIR, and no further response is necessary under CEQA. This comment will be provided to the decision makers for consideration; City staff’s response to this comment will be included as an appendix to the staff report.
- A5-15 The commenter recommends changes to text in Part 3 of the 2035 General Plan “Community Plan Areas and Special Design Areas.” The comment does not raise environmental issues or issues related to the adequacy of the Draft MEIR, and no further response is necessary under CEQA. This comment will be provided to the decision makers for consideration; City staff’s response to this comment will be included as an appendix to the staff report.
- A5-16 The commenter recommends changes to the proposed 2035 General Plan policies. The comment does not raise environmental issues or issues related to the adequacy of the Draft MEIR, and no further response is necessary under CEQA. This comment will be provided to the decision makers for consideration; City staff’s response to this comment will be included as an appendix to the staff report.

**Letter
A6**

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY

EDMUND G. BROWN JR.

DEPARTMENT OF TRANSPORTATION
DISTRICT 3 – SACRAMENTO AREA OFFICE
2379 GATEWAY OAKS DRIVE, STE 150 - MS 19
SACRAMENTO, CA 95833
PHONE (916) 274-0635
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TTY 711



*Flex your power!
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September 24, 2014

032014-SAC-0165
03-SAC-VAR
SCH # 2012122006

Mr. Scott Johnson
Community Development Department, Environmental Planning Services
City of Sacramento
300 Richards Blvd., 3rd Floor
Sacramento, CA 95811

City of Sacramento 2035 General Plan Update – Draft Master Environmental Impact Report (DMEIR)

Dear Mr. Johnson:

Thank you for including the California Department of Transportation (Caltrans) in the review process for the City of Sacramento’s 2035 General Plan Update (2035 GPU) DMEIR. The 2035 GPU DMEIR evaluates the full range of environmental issues contemplated for consideration under the California Environmental Quality Act (CEQA) and the CEQA Guidelines including, but not limited to, major issues with Transportation and Circulation under the jurisdiction of the City of Sacramento. The following comments are based on the 2035 GPU DMEIR.

General Plan Policies Related to Smart Transportation and Land Use

Caltrans commends the City of Sacramento on its policies related to improving multimodal transportation, establishing grid networks, removing accessibility barriers, creating walkable neighborhoods, and commitment to Transportation Demand Management strategies. These policies will help reduce reliance on automobile travel and help negate effects of urban sprawl on the transportation network. Caltrans also appreciates the commitment to freeway improvements when impacts to the freeway system are not able to be mitigated by other means.

A6-1

Transportation and Circulation Section

On page 4.12-26 of the 2035 GPU DEIR, Table 4.12-4, for Impact 4.12-4, indicates implementation of the 2035 GPU DMEIR will introduce potentially significant impacts to the State Highway System (SHS). However, on page 4.12-27, the DMEIR concludes, despite Policy M 1.5.6 and the pending Program 17, that traffic impacts due to implementation of the 2035 GPU are considered significant

A6-2

“Caltrans improves mobility across California”

Mr. Scott Johnson / City of Sacramento Community Development Department,
Environmental Planning Services
September 24, 2014
Page 2

and unavoidable. Caltrans disagrees with the conclusion because GPU traffic impacts can be reduced and/or mitigated by projects such as the Interstate 5 (I-5) High Occupancy Vehicle (HOV) Lane Project, I-5 / I-80 Connector Project and State Route 99 Ramp Metering projects. The above SHS improvements could benefit from fair-share contributions from new developments in the City. The City could also develop robust transit or parking reduction mitigation strategies to reduce impacts on the SHS to a less than significant level.

A6-2
cont.

Caltrans notes that not all freeway segments within the city limits of Sacramento are proposed as concept Level of Service (LOS) F. Please refer to the latest Transportation Concept Reports for freeway corridors at the following address and update future documents accordingly:

A6-3

<http://www.dot.ca.gov/dist3/departments/planning/systemplanningTCR.htm>

Encroachment Permit

Please be advised that any work or traffic control that would encroach onto the State Right of Way (ROW) requires an encroachment permit that is issued by Caltrans. To apply, a completed encroachment permit application, environmental documentation, and five sets of plans clearly indicating State ROW must be submitted to the address below:

A6-4

Mr. Bruce Capaul
Caltrans, District 3, Office of Permits
703 B Street
Marysville, CA 95901

Traffic-related mitigation measures should be incorporated into the construction plans prior to the encroachment permit process. See the website at the following uniform resource locator for more information: <http://www.dot.ca.gov/hq/traffops/developserv/permits/>.

Safety Thresholds

Caltrans would like to work with the City of Sacramento to develop safety thresholds that can be used as a tool in determining a proposed project’s potential for creating unsafe conditions for pedestrians, bicyclists, and motorists as a result of developmental impacts.

A6-5

Senate Bill (SB) 743

SB 743 presents Vehicle Miles Traveled (VMT) as an alternative to LOS in measuring potential transportation related impacts of development projects and long range plans like the 2035 GPU. Caltrans encourages the City to use Program 17 as a case example for mitigating VMT impacts in the 2035 GPU, future developments, and other long range plans. Caltrans also encourages the City to consider using the I-5 Corridor Subregional Mitigation Program Memorandum of Understanding and upcoming nexus study as a model for Program 17. For instance, if a project will have VMT impacts that are considered significant under CEQA, the project proponent could make contributions to

A6-6

“Caltrans improves mobility across California”

Mr. Scott Johnson / City of Sacramento Community Development Department,
Environmental Planning Services
September 24, 2014
Page 3

Program 17 based upon the development type. The projects in Program 17 could contain projects that would reduce regional VMT such as transit, walking, and bicycling improvements, and therefore satisfy CEQA requirements and legal nexus for project impacts. Caltrans would like to continue to work collaboratively with the City to establish new mitigation programs.

A6-6
cont.

Transportation and Construction Induced Vibration

On page 4.8-2 the DMEIR discusses Caltrans' Transportation-and Construction-Induced Vibration Manual, that was published in 2004. The City of Sacramento should be aware that a newer September 2013 version of the Manual is available at:
http://www.dot.ca.gov/hq/env/noise/pub/TCVGM_Sep13_FINAL.pdf.

A6-7

Please provide our office with copies of any further actions regarding this project. We would appreciate the opportunity to review and comment on any changes related to this development.

If you have any questions regarding these comments or require additional information please contact Arthur Murray, Intergovernmental Review Coordinator, at (916) 274-0616 or by email at: arthur.murray@dot.ca.gov.

Sincerely,



ERIC FREDERICKS, Chief
Office of Transportation Planning – South

c: Scott Morgan, State Clearinghouse

"Caltrans improves mobility across California"

Letter A6 Response	California Department of Transportation (Caltrans) Eric Fredericks, Chief, Office of Transportation Planning – South 9-24-14
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A6-1 The comment commends the City for several transportation-related policies. The comment does not raise issues related to the adequacy of the Draft MEIR. No further response is necessary.

A6-2 The commenter disagrees with the MEIR conclusion that traffic impacts resulting from the implementation of the 2035 General Plan Update are significant and unavoidable. The commenter goes on to state that fair-share contributions from new development projects within the City towards freeway improvement projects would reduce and/or mitigate impacts to freeway facilities.

The City supports efforts to improve the regional transportation system, including the I-5 Bus/Carpool Lanes and I-5 and I-80 HOV Connectors projects (mentioned by the commenter), both of which are included in the 2035 MTP/SCS for the region. The 2035 MTP/SCS is used in the analysis provided in the Draft MEIR.

Further, the General Plan includes the following policies indicating that the City will continue to support regional freeway network improvements through SACOG regional planning efforts and coordination with adjacent jurisdictions:

- ▲ **Policy M 1.3.7: Regional Transportation Planning.** The City shall continue to actively participate in Sacramento Area Council of Government's (SACOG's) regional transportation planning efforts to coordinate priorities with neighboring jurisdictions and continue to work with all local transit providers and the California Department of Transportation (Caltrans) on transportation planning, operations, and funding.
- ▲ **Policy M 1.5.7: Freeway Improvement Coordination.** The City shall work with Caltrans and adjacent jurisdictions to identify funding for improvements that address cumulative effects of planned development on the freeway system.

Additionally, Policy M 9.1.5 directions the City to consider fair-share payments as one option for needed transportation infrastructure improvements:

- ▲ **Policy M 9.1.5: Fair Share for Transportation Infrastructure Improvements.** The City shall require all new development to dedicate right-of-way, construct facilities, or pay its fair share for needed transportation infrastructure improvements that support all travel modes, including pedestrian, bicycle, and transit facilities, roadway improvements, and transportation demand management (TDM) programs and services.

The decision to require a fee payment will be made when individual projects are reviewed. General Plan Program 17 and Program 18 will govern potential future metrics and fee program implementation. As the commenter suggests, fees may reduce the impact to a less-than-significant level on a project-by-project basis; however, because the specific fee program and metrics are not currently in place, the precise impact reduction cannot be determined for the entire policy area. The conclusion that the impact would be significant and unavoidable is appropriate. No changes to the Draft MEIR text are necessary in response to this comment.

A6-3 The commenter states that not all freeway segments within the City are proposed as concept level of service (LOS) F, and refers to published Transportation Concept Reports.

According to the Interstate 80 and Capital City Freeway Corridor System Management Plan (Caltrans 2009), all segments of I-80 and the Capital City freeway located within Sacramento County have a concept LOS F. According to the Transportation Corridor Concept Report United States Highway 50 (Caltrans 2010), all segments of US 50 located in Sacramento County have a concept LOS F. According to the Transportation Corridor Concept Report Interstate 5 (Caltrans 2010), I-5 has a concept LOS F on all segments within Sacramento County except for the segment located in unincorporated Sacramento County (between the Yolo County line and the SR 99 interchange). According to the State Route 99 Transportation Corridor Concept Report (Caltrans 2010), SR 99 has a concept LOS F on all segments within Sacramento County except for the segment that serves as the border between unincorporated Sacramento County and the City of Sacramento (between the Sutter County line and the SR 99 interchange). The District 3 State Route 160 Transportation Concept Report indicates that the urban segment of SR 160, which functions as a freeway, will operate at LOS F within the 20-year horizon period under the “No Build” scenario, and that LOS E is “not feasible during the 20 year planning horizon due to physical limitations, which prevents any lane additions.” Therefore, all freeway segments located entirely within the City of Sacramento have a concept LOS of F. No changes to the Draft MEIR text are necessary in response to this comment.

A6-4 The commenter notes that any work or traffic control within the City that would encroach onto State Right-of-Way (ROW) would require an encroachment permit. This comment is noted. This comment does not raise issues or concerns regarding the adequacy, accuracy, or completeness of the environmental document. No further response is required.

A6-5 The commenter states that Caltrans would like to work with the City of Sacramento to develop thresholds related to the safety of pedestrians, bicyclists, and motorists as a result of impacts related to development. The City looks forward to maintaining a cooperative relationship with Caltrans and reviewing the implications of evolving guidelines. The City would appreciate the opportunity to collaborate on the development of modified and/or new guidelines as part of Program 2 in the General Plan Update:

Program 2. The City shall update its Traffic Impact Analysis and Mitigation guidelines to recognize contemporary methodologies for CEQA compliance and to reflect goals and policies of the General Plan. Mitigation recommendations should recognize the General Plan modal priorities.

The comment does not raise issues related to the adequacy of the Draft MEIR. No further response is necessary.

A6-6 The commenter states that Caltrans would like to collaborate with the City of Sacramento to develop new mitigation programs, and encourages the City to utilize Program 17 of the General Plan Update as a means for satisfying CEQA requirements in light of the passage of SB 743. The City will continue to collaborate with Caltrans on the implementation of Program 17 and Program 18 of the General Plan Update.

Program 17 states the City’s intention to develop multimodal transportation impact fee program(s), which would require the contribution of fair-share payments towards improvements to all transportation modes. Further, Program 18 of the General Plan Update affirms the City’s desire to investigate appropriate transportation performance metrics and thresholds in line with SB 743:

Program 18. Based on the California Environmental Quality Act (CEQA) guidelines amendments adopted for the implementation of SB 743 (Steinberg, 2013) or other future state legislation, the City shall consider the applicability of using transportation performance metrics and thresholds for measuring transportation system impacts provided in the approved guidelines amendments, as well as for making General Plan consistency

determinations and developing transportation financing programs. Based on this consideration, the City shall review, and update if needed, the General Plan LOS standards and policies and the Traffic Impact Analysis and Mitigation Guidelines to be consistent with the approved CEQA Guidelines amendments.

The comment does not raise issues related to the adequacy of the Draft MEIR. No further response is necessary.

A6-7 The commenter is correct. There is an updated (2013) version of the Caltrans Transportation-and-Construction-Induced Vibration Manual. Section 4.8, “Noise and Vibration,” of the Draft MEIR (p. 4.8-2) references the previous version of the Manual for the Caltrans-recommended vibration levels with respect to vibration effects on buildings. The updated 2013 version of the Manual did not include any changes to the recommended vibration levels; therefore, aside from the date of the reference, the information provided in the Draft MEIR remains accurate. The Draft MEIR is revised as follows to include the correct reference to the 2013 version of the Manual:

- ▲ Section 4.8 “Noise and Vibration”: p. 4.8-2 (last paragraph): In ~~2004~~2013, the California Department of Transportation (Caltrans) ~~published~~updated the Transportation-and-Construction-Induced Vibration Manual...
- ▲ Section 4.8 “Noise and Vibration”: p. 4.8-2 (Table 4.8-1): Source: Caltrans ~~2004~~2013
- ▲ Chapter 7 “References”: p. 7-3: California Department of Transportation. ~~2004~~2013. *Transportation- and Construction-Induced Vibration Guidance Manual*. Sacramento, CA: Noise, Vibration, and Hazardous Waste Management Office. ~~Prepared by Jones & Stokes.~~ Page ~~5~~24.

These changes provide minor clarification and do not alter the analysis or conclusions of the Draft MEIR. No further response is required



DELTA STEWARDSHIP COUNCIL
A California State Agency

980 NINTH STREET, SUITE 200
SACRAMENTO, CALIFORNIA 95811
WWW.DELTACOUNCIL.ORG
(916) 445-5511

**Letter
A7**

September 24, 2014

Scott Johnson, Associate Planner
City of Sacramento, Community Development Department
Environmental Planning Services
300 Richards Boulevard, Third Floor
Sacramento, CA 95811
SRJohnson@cityofsacramento.org

Chair
Randy Fiorini

Members
Aja Brown
Frank C. Damrell, Jr.
Phil Isenberg
Patrick Johnston
Larry Ruhstaller
Susan Tatayon

Executive Officer
Jessica R. Pearson

RE: City of Sacramento 2035 General Plan Update and Draft Master EIR, SCH# 2012122006

Dear Mr. Johnson:

Thank you for the opportunity to comment on the Draft City of Sacramento 2035 General Plan (draft general plan) and its Draft Master Environmental Impact Report (Draft MEIR). Council staff has appreciated the opportunity to meet with City staff to gain a better understanding of the general plan update and its consistency with the Delta Plan.

State law specifically directs the Council to provide "advice to local and regional planning agencies regarding the consistency of local and regional planning documents with the Delta Plan" (Water Code sec 85212). Council staff requests that the Delta Plan, including its policies and recommendations, be acknowledged in the Final MEIR's description of the project's environmental setting of each section to which it applies.

As we have discussed in our meetings, the Delta Stewardship Council (Council) has specific regulatory and appellate authority over certain actions that take place in whole or in part in the Delta, known as "covered actions". To this end, the Delta Plan contains a set of regulatory policies with which state and local agencies are required to be consistent with as of Sept. 1, 2013. The Delta Reform Act established a certification process for compliance with the Delta Plan (Water Code sec 85022).

Council staff is happy to provide assistance to the City of Sacramento in determining whether the proposed general plan update meets the statutory definition of a "covered action" and, as such, would require a certification of consistency. We encourage you to consult with Council staff to better understand the covered action process and how this project may or may not be consistent with the Delta Plan.

Sacramento Area Council of Governments' MTP/SCS

The Delta Reform Act establishes specific criteria and categories for excluding actions from the Council's regulatory authority. One of these exclusions is for actions within the secondary zone of the Delta that a metropolitan planning organization determines are consistent with its sustainable communities strategy (SCS). Such proposed actions are *not* "covered actions" regulated by the DSC (Water Code Section 85057.5(b)(4)).

The Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS) adopted by the Sacramento Area Council of Governments (SACOG) in 2012 contains a land use forecast that reflects the development activities described in the general plans and specific plans adopted by the local jurisdictions. Appendix E-3 of the MTP/SCS 2035, the Land Use Forecast Background Documentation, summarizes the planned development for each jurisdiction, including the City of Sacramento, which completed its last general plan update in 2009.

"Coequal goals" means the two goals of providing a more reliable water supply for California and protecting, restoring, and enhancing the Delta ecosystem. The coequal goals shall be achieved in a manner that protects and enhances the unique cultural, recreational, natural resource, and agricultural values of the Delta as an evolving place."

- CA Water Code §85054

A7-1
A7-2

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City of Sacramento, Community Development Department
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SACOG notes that proposed changes to the 2030 General Plan are not expected to modify the existing General Plan Policy Area, significantly alter existing or create new land use designations, or result in the redesignation of any land within the General Plan Policy Area. Thus, the 2035 general plan update is likely to be consistent with SACOG’s MTP/SCS. If SACOG determines that it is consistent, the general plan update would be exempt from the Council’s covered action process.

A7-2
cont.

Comments on the Draft General Plan

Council staff supports the draft general plan’s key policy changes, including establishing higher standards for flood protection, such as the commitment in EC 2.1.4 to “achieve by 2025 at least 200-year flood protection for all areas of the city.” We also commend the City for including EC 2.1.11, which states, “The City shall not approve new development or a subdivision or enter into a development agreement for any property within a flood hazard zone unless the adequacy of flood protection specific to the area has been demonstrated.” Council staff’s guidance on two Delta Plan policies and several Delta Plan recommendations to consider when evaluating the draft general plan’s consistency with the Delta Plan is provided below.

- **Delta Plan Policy DP P1, Locate New Urban Development Wisely.** The urban boundaries identified in the draft general plan should be consistent with the Delta Plan for the areas in which the Council has jurisdiction. The boundaries, which are described in Delta Plan Policy DP P1, are intended to strengthen existing Delta communities while protecting farmland and open space, providing land for ecosystem restoration needs, and reducing flood risk. In order to be consistent with Delta Plan Policy DP P1, new residential, commercial, or industrial development is permitted outside the urban boundaries only if it is consistent with the land use designated in the relevant county general plan as of the date of the Delta Plan’s adoption (May 16, 2013). Based on our discussion and review of the maps, it is our understanding that the 2035 General Plan update does not change the designation of any agricultural land or open space to commercial, residential or industrial land uses within the Delta, compared to the 2030 General Plan adopted in 2009 and amended in 2011.¹ This is an important factor to consider in analyzing the general plan’s consistency with Delta Plan Policy DP P1.

A7-3

We appreciate your inclusion of proposed general plan policy **ER 4.2.1, Protect Agricultural Lands**, which supports Delta Plan Policy DP P1. This policy commits the City to “encourage infill development and compact new development within the existing urban areas of the city in order to minimize pressure for premature conversion of productive agricultural lands for urban uses.” We also appreciate the inclusion of **ER 4.2.3, Coordinate to Protect Farmland**, which commits the City to “continue to work with the County and other adjacent jurisdictions to implement existing conservation plans to preserve prime farmland and critical habitat outside the city.” Proposed general plan policy **ER 2.1.2, Conservation of Open Space**, also supports the intent of Delta Plan Policy DP P1 by preserving and protecting floodways and undevelopable floodplains.

A7-4

¹ When Council staff met with City staff on April 23, 2014, we realized that there was a discrepancy between the Delta Plan map and the City’s General Plan map in terms of land use designations for the Delta Shores project site. The Delta Plan map shows a portion of the Delta Shores area designated as Open Space/Recreation. The City’s 2030 General Plan map that was adopted in 2009 and amended in 2011, however, shows this same area as designated for residential land uses with a smaller area designated for parks and recreation, which is consistent with the Delta Shores site plan. We realized that the Delta Plan was based on outdated data from 2008 and concluded that we will need to recommend to the Council that the Delta Plan be amended in the future to correct this error.

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- **Delta Plan Policy ER P4, Expand Floodplain and Riparian Habitats in Levee Projects.** Delta Plan Policy ER P4 states, “Levee projects must evaluate and where feasible incorporate alternatives, including the use of setback levees, to increase floodplains and riparian habitats. Evaluation of setback levees in the Delta shall be required only in the following areas...:(1) The Sacramento River between Freeport and Walnut Grove,…” This geographic area overlaps with the historic town of Freeport, including a City-operated golf course, located within the City of Sacramento’s sphere of influence. City staff should consider consistency with this policy in the description of the Freeport Subarea of the South Area Community Plan Area in the general plan. A7-5
- **Delta Plan Recommendation WR R1, Implement Water Efficiency and Water Management Planning Laws.** Delta Plan Recommendation WR R1 encourages all water suppliers to “fully implement applicable water efficiency and water management laws, including urban water management plans...[and] the 20 percent reduction in statewide urban per capita water usage by 2020…” Council staff appreciates the inclusion of proposed general plan policy **U 2.1.10, Water Conservation Standards**, which commits the City to achieving a 20 percent reduction in per-capita water use by 2020 consistent with the State’s 20x2020 Water Conservation Plan. We also appreciate the City’s inclusion in the table of “Utilities Implementation Programs” of the statement that the City “shall review and update its Urban Water Management Plan every 5 years.” A7-6
- **Delta Plan Recommendation DP R16, Encourage Recreation on Public Lands.** Delta Plan Recommendation DP R16 states, “Public agencies owning land should increase opportunities, where feasible, for bank fishing, hunting, levee-top trails, and environmental education.” Proposed general plan policies that would support this goal include **ER 2.1.2, Conservation of Open Space**, which calls for the City to provide appropriate public access along the American and Sacramento Rivers, floodways, and undevelopable floodplains, provided access would not disturb sensitive habitats or species, and **ERC 2.4.2, Waterway Recreation and Access**, which states that the City “shall work with regional partners, State agencies, private land owners, and developers to manage, preserve, and enhance the Sacramento and American River Parkways and urban waterways and riparian corridors to increase public access for active and passive recreation.” In addition, **ERC 2.4.3, Connections to Other Trails**, which states that the City “shall maintain existing and pursue new connections to local, regional, and state trails,” could be helpful in providing support for the development of connections to the Great Delta Trail, a program led by the Delta Protection Commission. A7-7
- **Delta Plan Recommendation WQ R1, Protect Beneficial Uses.** Several proposed general plan policies are intended to protect water quality, which is consistent with Delta Plan Recommendation WQ R1. For example, proposed general plan policy **ER 1.1.1, Conservation of Open Space Areas**, calls for the City to “conserve and where feasible create or restore areas that provide important water quality benefits such as riparian corridors, buffer zones, wetlands, undeveloped open space areas, levees, and drainage canals for the purpose of protecting water resources.” A7-8
- **Delta Plan Recommendation RR R1, Implement Emergency Preparedness and Response.** Several proposed general plan policies would contribute to achieving the Delta Plan’s goal of reducing flood risk in the Delta, as mentioned above. With respect to emergency preparedness, proposed general plan policy **EC 2.1.1, Interagency Flood Management**, calls for the City to work with local, regional, State, and Federal agencies to maintain an adequate information base, prepare risk assessments, and identify strategies to mitigate flooding impacts.” This policy could be strengthened by acknowledging the need to coordinate with federal, state and other local agencies in implementing the recommendations of the Sacramento-San Joaquin Delta Multi-Hazard Coordination Task Force, as outlined in Delta Plan Recommendation RR R1. A7-9

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City of Sacramento, Community Development Department
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Comments on Draft MEIR

Based our review of the Draft MEIR for the City of Sacramento 2035 General Plan Update, we recommend the following matters be discussed or included in the Final MEIR:

- **Inconsistencies with the Delta Plan.** The Final MEIR should discuss any inconsistencies between the proposed project and the Delta Plan, as required by 15125(d) of the California Environmental Quality Act (CEQA) Guidelines. Please note that the CEQA Guidelines' Appendix G states that a project that is inconsistent with any applicable land use plan, policy, or regulation may result in a finding of significant impact on biological resources. A7-10
- **Land Use and Population.** In the Final EIR, please cite Delta Plan Policy DP P1, provide an analysis of potential conflict with the policy due to the urbanization of agricultural land and open space within the Delta, and describe how any conflicts with the policy could be avoided or mitigated.² A7-11
- **Biological Resources.** The proposed project would result in significant and unavoidable impacts to biological resources. Specifically, it would contribute to regional loss of special-status plant or wildlife species or their habitat. The Draft MEIR states that no mitigation measures are available to offset potential impacts to biological resources. Delta Plan's Final Programmatic EIR provides a list of mitigation measures to address biological resources impacts that the City should consider including. (See Measures 4-1 through 4-5 in the attached excerpt from the Delta Plan's Mitigation and Monitoring Program.) A7-12

We also recommend adding the following mitigation measures, which are drawn from the Delta Plan's Final Programmatic EIR, to ensure that farmlands are protected to the greatest extent possible:

- "Design proposed projects to minimize, to the greatest extent feasible, the loss of the highest valued agricultural land.
- Redesign project features to minimize fragmenting or isolating farmland. Where a project involves acquiring land or easements, ensure that the remaining non-project area is of a size sufficient to allow viable farming operations. The project proponents shall be responsible for acquiring easements, making lot line adjustments, and merging affected land parcels into units suitable for continued commercial agricultural management.
- Reconnect utilities or infrastructure that serve agricultural uses if these are disturbed by project construction. If a project temporarily or permanently cuts off roadway access or removes utility lines, irrigation features, or other infrastructure, the project proponents shall be responsible for restoring access as necessary to ensure that economically viable farming operations are not interrupted.
- Manage project operations to minimize the introduction of invasive species or weeds that may affect agricultural production on adjacent agricultural land.
- Design proposed projects to minimize, to the greatest extent feasible, conflicts and inconsistencies with land protected by agricultural zoning or a Williamson Act contract and the terms of the applicable zoning/contract." A7-13

² Council staff recommends acknowledging the inconsistency described in Footnote 1 above and including the explanation in the Final EIR.

Scott Johnson, Associate Planner
City of Sacramento, Community Development Department
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Conclusion

Council staff looks forward to working with you to ensure that the City of Sacramento General Plan Update moves forward as quickly as possible while addressing flood risks and protecting biological resources in the Delta. I encourage you to contact Jessica Davenport at jdavenport@deltacouncil.ca.gov or (916) 445-2168 with your questions, comments, or concerns.

Sincerely,



Cindy Messer
Deputy Executive Officer

cc: Erik Vink, Delta Protection Commission

Attachment: Delta Plan Mitigation and Monitoring Reporting Program

DELTA PLAN MITIGATION AND MONITORING REPORTING PROGRAM

Delta Plan Mitigation Measure Number	Delta Plan Mitigation Measure	Implemented By	When Implemented	Monitoring or Reporting Action
4-1	<p>Biological Resources</p> <p>Delta Plan Mitigation Measure</p> <p>satisfy the well user's water supply needs.</p> <ul style="list-style-type: none"> If sheet piles are not effective and the impact on the well yield is important, such that the trucking in of water is not economically feasible, the affected well shall be deepened. Another option for a well that is deep enough would be to lower the pump bowl such that deepened water can be pumped out of the well. If these two options are not feasible, a new, deeper, replacement well shall be installed for groundwater production. 	Delta Stewardship Council	Council adopts Delta Plan mitigation measures pursuant to Policy G P1 and related findings (CC CR 5 502(2)(b)(2)).	Certification of Consistency process
	<ul style="list-style-type: none"> Avoid, minimize, and compensate for reduction in area and/or habitat quality of sensitive natural communities, including wetlands, by doing the following: <ul style="list-style-type: none"> Selecting project site(s) that would avoid sensitive natural communities, including jurisdictional wetlands and other wetlands, vernal pools, alkali seasonal wetlands, riparian habitats, and riparian dune scrub. Designing the maximum extent practicable project elements to avoid effects on sensitive natural communities. Reducing, restoring, or enhancing on a "no net loss" basis (in accordance with U.S. Army Corps of Engineers (USACE) and State Water Resources Control Board (SWRCB) requirements), wetlands and other waters of the United States and waters of the State that would be removed, lost, and/or degraded. Where impacts to sensitive natural communities other than waters of the United States or State are unavoidable, compensating for impacts by restoring and/or preserving in-kind sensitive natural communities (e.g., riparian habitat) on the project site, or on other nearby lands, through an mitigation bank that services the project site and that is approved by the appropriate agencies, in consultation with applicable regulatory agencies (at rates that offset temporal loss of habitat value). Implement advance mitigation planning for ecosystem restoration prior to construction. Implement construction best management practices, including: <ul style="list-style-type: none"> Developing and implementing a Stormwater Pollution Prevention Plan (SWPPP). Minimizing soil disturbance, erosion, and sediment runoff from project site. Avoiding and minimizing contaminant spills. Minimizing visual and noise disturbance from construction activities. Conducting biological construction monitoring to ensure that implemented Best Management Practices (BMPs) are effective. Restore areas temporarily affected by construction activities, including: <ul style="list-style-type: none"> Preparing reclamation plan for temporary impacts sites for review by resource agencies. Demolishing soil disturbance and recycling topsoil for later use if any areas to be graded. Replanting native and non-native plant species to restore natural communities. Restoring natural communities with similar or improved function from communities that were affected. If a project may result in conversion of oak woodlands, as identified in section 21085.4 of the Public Resources Code, one or more of the following mitigation measures shall be implemented: <ul style="list-style-type: none"> Contribute funds to the Oak Woodlands Conservation Fund, as established under subdivision (a) of section 1983 of the Fish and Game Code. An invasive species management plan shall be developed and implemented for any project which construction or operation could lead to introduction or facilitation of invasive species establishment. The plan shall ensure that invasive plant species and populations are kept below preconstruction abundance and distribution levels. The plan shall be based on the best available science and developed in consultation with Department of Fish and Wildlife (DFW) and local experts, such as the University of California Extension, county agricultural commissioners, representatives of County Weed Management Areas (CWMA), California Invasive Plant Council, and California Department of Food and Agriculture. The Invasive species management plan will include the following elements: <ul style="list-style-type: none"> Non-native species management methods Early detection methods 			

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DELTA PLAN MITIGATION AND MONITORING REPORTING PROGRAM

Delta Plan Mitigation Measure Number	Delta Plan Mitigation Measure	Implemented By	When Implemented	Monitoring or Reporting Action
4-2	<p>Notification requirements:</p> <ul style="list-style-type: none"> Best management practices for preconstruction, construction, and post construction periods Best management practices for erosion control Provisions for updating the target species list over the lifetime of the project as new invasive species become potential threats to the integrity of the local ecosystems <p>Select project site(s) that would avoid habitats of special-status species (which may include foraging, shunning, migration and rearing habitat in addition to breeding or spawning habitat), and to the maximum extent practicable, (re)design project elements to avoid effects on such species.</p> <ul style="list-style-type: none"> Schedule construction to avoid special-status species' breeding, spawning, or migration seasons during the seasons or active periods that these activities occur. Conduct preconstruction surveys (by a qualified biologist) for special-status species in accordance with U.S. Fish and Wildlife Service (USFWS), National Marine Fisheries Service (NMFS) and DFW survey methodologies and appropriate timing to determine presence and locations of any special-status species and their habitat, and avoid, minimize, or compensate for impacts to special-status species in coordination with DFW and USFWS or NMFS. Establish buffers around special-status species habitats to exclude effects of construction activities. The size of the buffer shall be in accordance with USFWS and DFW protocols for the applicable special-status species. If more than one removal is necessary, remove the tree only after the nest is no longer active, as determined by a qualified biologist. Conduct construction monitoring (by qualified biologist) to ensure effectiveness of avoidance and minimization measures and implement remedial measures if necessary. When appropriate, relocate special-status plant and animal species or their habitats from project sites following USFWS, NMFS, and DFW protocols (e.g., for special-status plant species or adiabary shrubs). Where impacts to special-status species are unavoidable, compensate for impacts by restoring or preserving in-kind suitable habitat on-site, or off-site, or by purchasing restoration or preservation credits in compliance with the California Endangered Species Act (CESA) and Federal Endangered Species Act (ESA) for affected State- or federally-listed species from a mitigation bank that serves the project site and that is approved by the appropriate agencies, in consultation with the appropriate regulatory agencies (at rates that offset the temporary loss of habitat value). 	Delta Stewardship Council	Council adopts Delta Plan mitigation measures pursuant to Policy G P1 and rulemaking is completed.	Certification of Consistency process
4-3	<ul style="list-style-type: none"> Select project site(s) that would avoid a substantial reduction in fish and wildlife species habitat. To the maximum extent practicable, design project elements to avoid effects that would lead to a substantial loss of fish and wildlife habitat. Replace, restore, or enhance habitats for fish and wildlife species that would be lost. Where substantial loss of habitat for fish and wildlife species is unavoidable, compensate for impacts by preserving in-kind habitat. 	Delta Stewardship Council	Council adopts Delta Plan mitigation measures pursuant to Policy G P1 and rulemaking is completed (23 CCR § 5002(b)(2)).	Certification of Consistency process
4-4	<ul style="list-style-type: none"> Protect habitat for migratory waterfowl and shorebirds by expanding existing wetland refuges and management areas, and establishing new ones in or near wetland areas used by migratory waterfowl and shorebirds. Manage these areas by establishing suitable vegetation, hydrology and other habitat components to optimize the use by migratory waterfowl and shorebirds. Protect, restore and enhance connectivity of habitats, including but not limited to wetland and riparian habitats that function as migration corridors for wildlife species (similar to how has been implemented through programs such as the California Estuarine Habitat Connectivity Project). Acquire areas with potential to increase connectivity between existing habitats, protect these areas in perpetuity through the adoption of conservation easements, deed restrictions, or other legal mechanisms, and enhance connectivity through revegetation. Habitat connectivity might be accomplished by establishing suitable hydrology or other physical conditions for desirable vegetation, planting, 	Delta Stewardship Council	Council adopts Delta Plan mitigation measures pursuant to Policy G P1 and rulemaking is completed (23 CCR § 5002(b)(2)).	Certification of Consistency process

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DELTA PLAN MITIGATION AND MONITORING REPORTING PROGRAM

Delta Plan Mitigation Measure Number	Delta Plan Mitigation Measure	Implemented By	When Implemented	Monitoring or Reporting Action
4-5	<p>desirable vegetation, fencing and managing grazing, and other means.</p> <ul style="list-style-type: none"> Protect migratory pathways for migratory aquatic species such as salmon, steelhead, andurgeon including those that use Delta tributaries and floodplain habitats by screening new diversions, and screening existing diversions and removing existing migration barriers if the specific proposed project/activity (e.g., increased intake volume through an existing unscreened diversion, new diversion, new barrier, new barrier near an existing unscreened diversion) may exacerbate the negative effect on migratory aquatic species caused by the existing barrier or unscreened diversion. Avoid or minimize alteration of flow patterns and water quality effects that could disrupt migratory cues for migratory aquatic species by implementing water management measures and establishing programs to reduce water pollution. Prior to construction, evaluate impacts to trees or other biological resources protected by local policies and ordinances, and abide by any permit requirements associated with those policies and ordinances. 	Delta Stewardship Council	Council adopts Delta Plan Mitigation Measure G P1 and Rulemaking 5 completed (23 CCR § 5002(b)(2)).	Certification of Consistency process
Delta Flood Risk				
5-1	<ul style="list-style-type: none"> Propose a drainage or hydrology and hydraulic study that would assess the need and provide a basis for the design of drainage-related mitigations, such as new onsite drainage systems or new cross drainage facilities. Prepare the study in accordance with applicable standards of Federal Emergency Management Agency (FEMA), USACE, state Department of Water Resources (DWR), Central Valley Flood Protection Board (CVFPB), as well as the local reclamation districts and flood control agencies and the counties and cities. Design subsequent mitigation measures in accordance with the final study and with the applicable standards of FEMA, USACE, DWR, and CVFPB. The study would identify potential increases in flood risk, including those that may result from new facilities. Provide temporary drainage bypass facilities that would reroute drainage around, along, or over the Proposed Project facilities and construction sites. The temporary bypass facilities would be designed in accordance with the local standards and would be designed to maintain hydraulic study and would be in place until long-term replacement facilities are completed. Provide onsite stormwater detention storage at construction and project facility sites that would reduce project-caused short- or long-term increases in drainage runoff. The storage space placement and capacity would be designed based on the drainage or hydrologic and hydraulic study. Base on the results of the drainage or hydrologic and hydraulic study, arrange the length of any steeples or other construction features in the direction of the floodplain flow to maximize surface flows under flood flow conditions. At in-stream construction sites that might reduce channel capacity, install setback levees or bypass channels to maintain channel capacity and to mitigate hydraulic impacts. Where low channel velocities might result from construction, implement a sediment management program in order to maintain channel capacity. Provide cross drainage, replacement drainage paths and facilities, and enlarged flow paths to reroute drainage around, under, or over the Proposed Project facilities and to restore the function of any affected existing drainage or flow paths and facilities. Channel modifications for restoration actions would be required to be implemented to maintain or improve flood management functions and would be coordinated with the USACE, DWR, CVFPB, and other flood control agencies to assess the desirability and feasibility for channel modifications. To the extent consistent with floodplain land uses and flood control requirements, if applicable, woody riparian vegetation would be allowed to naturally establish. 	Delta Stewardship Council	Council adopts Delta Plan Mitigation Measure G P1 and Rulemaking 5 completed (23 CCR § 5002(b)(2)).	Certification of Consistency process

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Letter A7 Response	Delta Stewardship Council Cindy Messer, Deputy Executive Officer 9-24-14
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- A7-1 The comment describes the role and authority of the Delta Stewardship Council and discusses certification for compliance with the Delta Plan. The commenter offers the Council's assistance in determining whether the proposed 2035 General Plan would require a certification of consistency. The comment does not raise any issues related to the adequacy of the Draft MEIR. The Background Report, included as Appendix C of the Draft MEIR, includes a discussion of the Delta Plan.
- A7-2 The comment correctly indicates that the proposed 2035 General Plan would not modify the Policy Area identified in the 2030 General Plan and that the proposed 2035 General Plan is likely consistent with SACOG's MTP/SCS. The comment states that if SACOG determines that the proposed 2035 General Plan is consistent then the General Plan would be exempt from the Council's covered action process. The comment letter received from SACOG (See Agency Comment A13) states that since there are no changes to the land uses in the Draft 2035 General Plan Update, the General Plan and the MTP/SCS remain compatible. Based on this comment, it is expected that the General Plan would be exempt from the Council's covered action process; however, the City will coordinate with the Council to verify. This comment does not raise issues related to the adequacy of the Draft MEIR. No further response is necessary.
- A7-3 The commenter concurs with various policies in the proposed 2035 General Plan. The comment does not raise environmental issues or issues related to the adequacy of the Draft MEIR. This comment will be provided to City Council for consideration. No further response is necessary.
- A7-4 The commenter concurs with various policies in the proposed 2035 General Plan. The comment does not raise environmental issues or issues related to the adequacy of the Draft MEIR. This comment will be provided to City Council for consideration. No further response is necessary.
- A7-5 The comment recommends changes in the proposed 2035 General Plan to make the text more consistent with language in the Delta Plan. The comment does not raise environmental issues or issues related to the adequacy of the Draft MEIR, and no further response is necessary under CEQA. This comment will be provided to the decision makers for consideration; City staff's response to this comment will be included as an appendix to the staff report.
- A7-6 The comment recommends changes in the proposed 2035 General Plan to make the text more consistent with language in the Delta Plan. The comment does not raise environmental issues or issues related to the adequacy of the Draft MEIR, and no further response is necessary under CEQA. This comment will be provided to the decision makers for consideration; City staff's response to this comment will be included as an appendix to the staff report.
- A7-7 The comment recommends changes in the proposed 2035 General Plan to make the text more consistent with language in the Delta Plan. The comment does not raise environmental issues or issues related to the adequacy of the Draft MEIR, and no further response is necessary under CEQA. This comment will be provided to the decision makers for consideration; City staff's response to this comment will be included as an appendix to the staff report.
- A7-8 The comment recommends changes in the proposed 2035 General Plan to make the text more consistent with language in the Delta Plan. The comment does not raise environmental issues or issues related to the adequacy of the Draft MEIR, and no further response is necessary under CEQA. This comment will be provided to the decision makers for consideration; City staff's response to this comment will be included as an appendix to the staff report.

- A7-9 The comment recommends changes in the proposed 2035 General Plan to make the text more consistent with language in the Delta Plan. The comment does not raise environmental issues or issues related to the adequacy of the Draft MEIR, and no further response is necessary under CEQA. This comment will be provided to the decision makers for consideration; City staff's response to this comment will be included as an appendix to the staff report.
- A7-10 The comment indicates that the Final MEIR should identify any inconsistencies between the proposed 2035 General Plan and the Delta Plan. Only the very southwest portion of the Policy Area (primarily the Pocket Area and Delta Shores) is within the "Legal Delta" identified in the Delta Plan. The Delta Plan identifies the "planned land use" of these areas as "Areas Designated for Development." Therefore, the 2035 General Plan land use designations are consistent with the Delta Plan. The proposed 2035 General Plan policies are also consistent with the Delta Plan.
- A7-11 The comment requests an analysis of potential conflict with Delta Plan Policy DP P1, which relates to the urbanization of agricultural land and opens space within the Delta. As mentioned in response to comment A7-10 above, only the southwest portion of the Policy Area is within the "Legal Delta" and is identified within the Delta Plan for urban development. Therefore, the proposed project would not result in conversion of agricultural land that is inconsistent with the Delta Plan.
- A7-12 The comment correctly indicates that the Draft MEIR identifies a significant and unavoidable impact related to the regional loss of special-status plant or wildlife species or their habitat. The comment indicates that the Draft MEIR states that no mitigation measures are available to offset the impact, and the comment then refers to mitigation measures provided in the Delta Plan's Mitigation and Monitoring Program (MMP). An important point of clarification is that the Draft MEIR indicates that no mitigation measures are available and that "[p]roposed policies require all feasible impact-reducing actions as part of the 2035 General Plan." The proposed 2035 General Plan includes a wide range of policies designed to reduce impacts to biological resources. In many cases, these policies are similar to the mitigation measures identified in the Delta Plan's MMP, and, on the whole, both the mitigation measures in the Delta Plan MMP and the policies included in the proposed 2035 General Plan result in the similar overall impact reduction. The commenter does not identify specific issues with the proposed 2035 General Plan policies designed to protect biological resources and also does not identify any issues related to the Draft MEIR analysis (aside from a general suggestion that mitigation measures be added). Further, the commenter does not provide specific suggestions regarding which mitigation measures should be incorporated. Because the policies in the Draft MEIR are designed to reduce impacts to biological resources and overlap with the mitigation measures identified in the Delta Plan MMP, the comment does not result in changes to the Draft MEIR or the proposed 2035 General Plan policies.
- A7-13 The comment recommends incorporating mitigation measures from the Delta Plan to protect farmland. As mentioned in response to comment A7-10 above, only the southwest portion of the Policy Area is within the "Legal Delta" and is identified within the Delta Plan for urban development. Therefore, the proposed 2035 General Plan would not result in conversion of land identified in the Delta Plan for agricultural uses. Furthermore, the proposed 2035 General Plan includes policies related to agricultural resource protection. No further mitigation is necessary.

STATE OF CALIFORNIA – NATURAL RESOURCES AGENCY

EDMUND G. BROWN, JR.

DELTA PROTECTION COMMISSION

2101 Stone Blvd., Suite 210
West Sacramento, CA 95691
Phone (916) 375-4800 / FAX (916) 376-3962
Home Page: www.delta.ca.gov



**Letter
A8**

Contra Costa County Board of Supervisors

Sacramento County Board of Supervisors

San Joaquin County Board of Supervisors

Solano County Board of Supervisors

Yolo County Board of Supervisors

Cities of Contra Costa and Solano Counties

Cities of Sacramento and Yolo Counties

Cities of San Joaquin County

Central Delta Reclamation Districts

North Delta Reclamation Districts

South Delta Reclamation Districts

CA State Transportation Agency

CA Department of Food and Agriculture

CA Natural Resources Agency

CA State Lands Commission

September 24, 2014

Scott Johnson
Associate Planner
City of Sacramento
Community Development Department
Environmental Planning Services
300 Richards Boulevard, Third Floor
Sacramento, CA 95811

Re: City of Sacramento 2035 General Plan Update

Dear Mr. Johnson:

Thank you for providing the Delta Protection Commission (Commission) the opportunity to review the City of Sacramento 2035 General Plan Update. Proposed projects within the Primary Zone of the Legal Delta must be consistent with the Commission’s Land Use and Resource Management Plan (LURMP). The Commission also provides comments on proposed projects in the Secondary Zone that have the potential to affect the resources of the Primary Zone. The General Plan Update applies to areas within the Secondary Zone of the Legal Delta.

We reviewed the 2035 General Plan Update (dated August 2014) and determined the General Plan Update is consistent with the LURMP. The General Plan Update is consistent with the following policies:

LURMP, Natural Resources P-1: Preserve and protect the natural resources of the Delta. Promote protection of remnants of riparian and aquatic habitat. Encourage compatibility between agricultural practices, recreational uses and wildlife habitat.

LURMP, Natural Resources P-7: Incorporate, to the maximum extent feasible, suitable and appropriate wildlife protection, restoration and enhancement on publicly-owned land as part of a Delta-wide plan for habitat management.

LURMP, Natural Resources P-9: Protect and restore ecosystems and adaptively manage them to minimize impacts from climate change and other threats and support their ability to adapt in the face of stress.

LURMP, Water P-1: State, federal and local agencies shall be strongly encouraged to preserve and protect the water quality of the Delta both for in-stream purposes and for human use and consumption.

LURMP, Levees P-1: Local governments shall carefully and prudently carry out their responsibilities to regulate new construction within flood hazard areas to protect public health, safety, and welfare. These responsibilities shall be carried out consistent with applicable regulations concerning the Delta, as well as the statutory language contained in the Delta Protection Act of 1992. Increased flood protection

A8-1

Scott Johnson
City of Sacramento Community Development Department
Page 2

shall not result in residential designations or densities beyond those allowed under zoning and general plan designations in place on January 1, 1992, for lands in the Primary Zone.

LURMP, Levees P-2: Support programs for emergency levee repairs and encourage coordination between local, State, and federal governments. The programs may include but are not limited to: interagency agreements and coordination; definition of an emergency; designation of emergency funds; emergency contracting procedures; emergency permitting procedures; and other necessary elements.

LURMP, Levees P-3: Support efforts to address levee encroachments that are detrimental to levee maintenance.

A8-1
cont.

The City may want to consider General Plan policies that encourage economic development partnerships and transportation connections, including trails and rail lines, between the city of Sacramento and surrounding areas in the Sacramento-San Joaquin River Delta. Congress is currently considering a bill to establish a Sacramento-San Joaquin Delta National Heritage Area (NHA), which would include portions of the Town of Freeport. If NHA designation does occur, the Commission will work with the City on establishing partner sites for activities related to recreation, heritage tourism, public access, and environmental education.

A8-2

Thank you for the opportunity to provide input. Please contact Blake Roberts, Associate Environmental Planner, at 916-375-4237 for any questions regarding the comments provided.

Sincerely



Erik Vink
Executive Director

cc: Don Nottoli, Sacramento County Board of Supervisors

**Letter
A8
Response****State of California – Natural Resources Agency, Delta Protection Commission**
Erik Vink, Executive Director
9-24-14

-
- A8-1 The commenter indicates that the proposed 2035 General Plan is consistent with the Delta Protection Commission’s Land Use and Resource Management Plan (LURMP) and describes the consistency with specific policies from the LURMP. The comment does not raise environmental issues or issues related to the adequacy of the Draft MEIR. No further response is necessary.
- A8-2 The commenter suggests General Plan policies that encourage economic development partnerships and transportation connections between the City and surrounding areas. The commenter indicates that if the Sacramento-San Joaquin Delta National Heritage Area is established by Congress, the Commission will work with the City in creating partnerships. This comment relates to the proposed 2035 General Plan policies. The comment does not raise environmental issues or issues related to the adequacy of the Draft MEIR, and no further response is necessary under CEQA. This comment will be provided to the decision makers for consideration; City staff’s response to this comment will be included as an appendix to the staff report.

SACRAMENTO-YOLO
MOSQUITO
& VECTOR
CONTROL
DISTRICT

Letter
A9

MAILING ADDRESS
SACRAMENTO COUNTY
8631 BOND ROAD
ELK GROVE, CA 95624

YOLO COUNTY
1234 FORTNA AVENUE
WOODLAND, CA 95695

1.800.429.1022
FIGHTtheBITE.net

Scott Johnson
City of Sacramento
Community Development Department
300 Richards Blvd. Third Floor
Sacramento, Ca. 95811

September 25, 2014

Re: **City of Sacramento General Plan (DEIR)**

The Sacramento-Yolo Mosquito and Vector Control District “District” appreciates the opportunity to review and comment on the General Plan Amendment and associated permit for the City of Sacramento General Plan 2035 Update (DEIR) (LR12-003) “Project”. The following are comments based on the documents that were provided or available to the District.

General Comment:

The District and mosquito breeding should be addressed in all future individual planning documents.

A9-1

PHS 5.1.10 Pest/Vector Management—“The City shall coordinate with appropriate agencies (e.g., Sacramento-Yolo Mosquito and Vector Management District) to support pest/vector management strategies (e.g., mosquito control), require drainage of untreated pools and other water features in homes and businesses that are vacant or in sale proceedings, and enhance public awareness of vector control.. (IGC/PI)”

A9-2

*Please change to read: **Vector/Disease Management**- The City and any development applicant shall coordinate with the Sacramento Yolo Mosquito and Vector Control District to support vector and disease management strategies (e.g. Mosquito and vector control, BMP Implementation). The City shall:*

- *Require maintenance to reduce or eliminate any mosquito breeding habitats that occur on any residential, commercial or public properties including but not limited to: unmaintained pools, residential and commercial water features, irrigation control boxes and natural or manmade drainages.*

PROVIDING SAFE, EFFECTIVE AND ECONOMICAL MOSQUITO AND VECTOR CONTROL

- *Require the Community Development Department to coordinate with the District on new construction or enhancement projects, including plan and easement review where mosquitoes may breed.*
- *Require implementation of the District's Best Management Practices (BMPs) for design and maintenance guidelines for any existing as well as proposed projects that may raise mosquitoes, The District's Mosquito Reducing Best Management Practices Manual (BMP) can be downloaded from the District's website at: <http://www.fightthebite.net/physical-control/>,*
- *Require City Utilities Department to coordinate with the District on maintenance schedules and treatment schedules of all stormwater and combined sewer system infrastructures including but not limited to: catchbasins, drop inlets, vaults and retention/detention areas.*

A9-2
cont.

Although the District can employ the California Health and Safety Code in order to ensure safe conditions and to sustain its public responsibilities (abatement and enforcement actions), it has been the District's experience that a cooperative approach provides more effective and long-lasting mosquito management and directs cities and municipalities on how to best achieve their co-equal goals. It is the intent of the District to work cooperatively with the City and its project applicants to balance mosquito control within each project or specific land use.

Should you have any questions or concerns please feel free to contact me at (916) 405-2093.

Sincerely,



Kevin Combo
Ecological Management Department
Sacramento Yolo Mosquito and Vector Control District
kcombo@FightTheBite.net

Letter	Sacramento-Yolo Mosquito Vector Control District
A9	Kevin Combo, Ecological Management Department
Response	9-25-14

- A9-1 The comment states that the District and control of mosquito breeding should be addressed in all future individual planning documents. The comment raises policy issues and does not identify any issues related to the adequacy of the Draft MEIR, and no further response is necessary under CEQA. This comment will be provided to the decision makers for consideration; City staff's response to this comment will be included as an appendix to the staff report.
- A9-2 The commenter recommends changes to the proposed 2035 General Plan policy to more specifically address issues related to mosquito breeding. Development applications will continue to be routed to the Sacramento-Yolo Mosquito and Vector Control District for its input. The comment raises policy issues and does not identify any issues related to the adequacy of the Draft MEIR, and no further response is necessary under CEQA. This comment will be provided to the decision makers for consideration; City staff's response to this comment will be included as an appendix to the staff report.

City of Sacramento General Plan Update (SAC200500814)

Sept 25, 2014 – Page 2

into consideration to promote vigorous growing, water-thrifty, long-lived trees that foster biodiversity and ecosystem services. Developers can obtain information on biogenic emissions of specific tree species from the City of Sacramento Planning Department, the Sacramento Metropolitan Air Quality Management District, or the Sacramento Tree Foundation.

A10-1
cont.

Including additional active transportation treatments

LU 4.2.1 – Enhanced Walking and Biking specifies various treatments that the City will consider. Please evaluate additional walking and biking treatments as proffered in the Urban Street Design Guide issued by the National Association of City Transportation Officials.

A10-2

General comments

To summarize, the District requests that the City consider low BVOC trees and expand specified treatments for active transportation modes.

A10-3

The SMAQMD thanks the City of Sacramento for the opportunity to comment on this project. If you have additional questions or require further assistance, please contact me at pphilley@airquality.org or (916) 874-4882.

Sincerely,



Paul Philley, AICP
Associate Air Quality Planner/Analyst
Sacramento Metropolitan Air Quality Management District
777 12th Street, 3rd Floor
Sacramento, CA 95814

777 12th Street, 3rd Floor ■ Sacramento, CA 95814-1908
916/874-4800 ■ 916/874-4899 fax
www.airquality.org

Letter	Sacramento Metropolitan Air Quality Management District (SMAQMD)
A10	Paul Philley, AICP, Associate Air Quality Planner/Analyst
Response	9-25-14

- A10-1 The comment recommends that the 2035 General Plan include a policy expressing a preference for Low Biogenic Volatile Organic Compound (BVOC) trees. Similar to reactive organic gases (ROG) BVOCs react with NO_x to produce ozone. According to a March 2012 peer-reviewed study by UC Davis Department of Agriculture and Natural Resources, California native oaks (e.g., *Quercus douglasii* [blue oak] and *Q. agrifolia* [coast live oak]) have high isoprene emission rates. Isoprene is the type of BVOC that plants emit in greatest quantity. The report also shows that California sycamore (*Platanus racemosa*), Valley oak (*Q. lobata*), and other California native trees have high isoprene emission rates. All of these native tree species provide substantial ecological value and their protection and planting should be encouraged from a biological standpoint. Creating the policy recommended by the commenter could diminish the City's ecological actions by devaluing several native tree species, especially native oak trees, and is therefore not considered to be consistent with City goals. In light of the UC Davis study, the City recommends that SMAQMD reconsider this policy guidance, which, if implemented, could ultimately discourage planting of many important native California trees, including most native oak trees. The UC Davis report is available at the following URL: <http://anrcatalog.ucdavis.edu/pdf/8484.pdf> The City appreciates this comment and will continue to coordinate with SMAQMD regarding BVOC-emitting tree species. The comment does not raise issues related to the adequacy of the Draft MEIR.
- A10-2 For Policy LU 4.2.1, the commenter recommends evaluating additional pedestrian and bicycle treatments as identified in the Urban Street Design Guide issued by the National Association of City Transportation Officials. The comment raises policy issues and does not identify any issues related to the adequacy of the Draft MEIR, and no further response is necessary under CEQA. This comment will be provided to the decision makers for consideration; City staff's response to this comment will be included as an appendix to the staff report.
- A10-3 The commenter summarizes the issues raised in the letter. Responses to the issues raised are provided in response to comment A10-1 and A10-2 above. No further response is needed.

**Letter
A11**

Regional Parks Department
Jeffrey R. Leatherman, Director



County of Sacramento

Divisions
Administration
Golf
Leisure Services
Maintenance
Rangers
Therapeutic Recreation Services

September 25, 2014

Scott Johnson, Associate Planner
City of Sacramento, Community Development Department
Environmental Planning Services
300 Richards Boulevard, Third Floor
Sacramento, CA 95811

Re: City of Sacramento 2035 General Plan

Mr. Johnson,

Please accept the following comment letter from the Sacramento County Recreation and Parks Commission (Parks Commission) in response to the City of Sacramento's Draft 2035 General Plan and Master Environmental Impact Report.

Master EIR

Comment: The American River Parkway Plan (December 1985) is referenced in numerous sections of the Master EIR (MEIR). In 2009 the California State Legislature approved the 2008 American River Parkway Plan as the governing document for the American River Parkway. The 2035 General Plan and MEIR should be consistent with the 2008 American River Parkway Plan.

A11-1

Section 4.9 Parks and Recreation

4.9.2 Environmental Setting

Comment: The Environmental Setting appears to be inconsistent with section 2-15 of the MEIR which defines Open Space, Parks and Recreation and includes a variety of recreation improvements which are broadly defined to include natural parks; woodlands and habitat; and further and more specifically defined as sports fields; playground equipment; picnic and sitting areas; open turf and natural acres; trails; and golf courses. The Environmental Setting in section 4.9.2 limits the definition of parks to neighborhood and community parks. The Environmental Setting should be consistent with section 2-15 of the MEIR and include all recreation amenities available in the City of Sacramento. Consistency with the definition in the MEIR would also increase the current service level by the City of Sacramento, and would likely exceed 5 acres per 1000 residents.

A11-2

4040 Bradshaw Road • Sacramento, California 95827 • phone (916) 875-6961 • fax (916) 875-6632 • www.saccounty.net

4.9.3 Impacts and Mitigation Measures

Comment: The amount of potential park land in any given land use area of the city should not be used as justification for a decrease in park land requirements. The City of Sacramento has historically been providing creative park solutions in the downtown and midtown area including modifying parking areas for Parklets and other creative solutions that could qualify as park improvements in the future.

A11-3

Comment: The MEIR does not completely review the impacts of the decrease in in-lieu fees or the decrease of required future park land which will result in a decrease of funds available to the City of Sacramento for park maintenance, capital improvements and a lack of parkland in the city. This is significantly more impactful in the downtown area of the city, as the 2035 General Plan Amendment considers dropping the park requirement from 5 acres per 1000 residents to 1.7 acres per 1000 residents. The higher density living in downtown requires adequate community and recreation space for future residents. The city should consider an approach that creatively designs and qualifies parks in these high density areas as opposed to blanket policies that decrease park requirements and in-lieu fees.

A11-4

Comment: The MEIR does not review the impacts of the decrease in park dedication or in-lieu fees in relation to the impact to County Parks such as the American River Parkway or special recreation and park districts in the unincorporated area of the County. The MEIR should review the impacts of a decrease in available city park land in relation to an increase of use for existing County and special district facilities due to the lack of future facilities provided for city residents.

A11-5

Comment: The City of Sacramento intends to "count non-city owned recreation amenities at "full build out" as a contributing factor to the service level goals;" however, the city fails to follow the same philosophy to establish the current service level. If the city were to use this same measure to the current service level the park land provided to the City of Sacramento residents would likely exceed 5 acres per 1000 residents today throughout the city.

A11-6

Goal ERC 2.2

Comment: The revised service level recommendations of 3.4 Acres per 1000 residents and 1.7 acres per 1000 residents appears to be inconsistent with ERC 2.2 which states that the city shall "plan and develop parks, community and recreation facilities and services that enhance community livability; improve public health and safety; are equitably throughout the city; and are responsive to the needs and interest of the residents, employees, and visitors." A decrease in park land development will decrease community livability, public health and safety. The high density plans for the downtown core of the city will create a significant need for park services in densely populated areas. The decrease in park requirements will significantly decrease the city's Park and Recreation Department's ability to provide and maintain adequate recreation services for a high concentration of people with seemingly no public recreation space available within 1/2 mile of the homes. The city should consider alternatives that do not impact the provision of services or facilities for the downtown area and instead consider options for creatively designing public recreation spaces within the high density areas of the city.

A11-7

Policies 2.2.6 through 2.2.17

Comment: These policies collectively reference developing urban parks within an impacted and built out city using creative opportunities that provide broad definition of parks and community space. The creative definition of qualifying park land could create increased cost

A11-8

Page 3

September 26, 2014

for development and long term care of public facilities; however, the service level recommendation decreases the amount of in-lieu fees that would be available to creatively design and develop park land in the city.

A11-8
cont

Impacts and Mitigation Measures

Comment: The MEIR does not evaluate the impacts of decreasing park dedication requirements for new development in the City of Sacramento, including the impacts to non-city managed or non-city owned recreation facilities such as the American River Parkway and surrounding local park districts. By selectively counting current services levels in the City of Sacramento, the MEIR concludes that the impacts are less-than-significant. The Department of Regional Parks requests that the City of Sacramento reconsider this finding based on the impacts of the loss of future parkland and in-lieu fees due to the revised park acreage requirement. The impact of this policy decision will create a greater burden on the County of Sacramento and the surrounding local park districts to provide neighborhood and community park space to the residents of the City of Sacramento.

A11-9

Parks and recreation services provide vital community connections creating a livable and desirable community. Future development in the City of Sacramento has the opportunity to continue Sacramento's legacy as a livable community that is enhanced by a variety of public recreation amenities. Decreasing park requirements in the urban center of the City to 1.7 acres per 1000 and 3.4 acres in the surrounding communities will allow development to grow in the city without providing the necessary parks and community services the future residents deserve.

A11-10

Respectfully,

Dan Gonzales, Chairman
Sacramento County Recreation and Parks Commission

Comments approved by the Sacramento County Recreation and Park Commission September 25, 2014 on a motion by Beckwith seconded by Lapin and a final vote of 5 to 0.

Cc: Sacramento County Board of Supervisors
City of Sacramento City Council
City of Sacramento Parks and Recreation Commission
Mr. Bradley J. Hudson, Sacramento County Executive Officer

<p>Letter A11 Response</p>	<p>County of Sacramento, Regional Parks Department Dan Gonzales, Chairman, Sacramento County Recreation and Parks Commission 9-25-14</p>
-------------------------------------------	---------------------------------------------------------------------------------------------------------------------------------------------------------

- A11-1 The commenter correctly indicates that the Draft MEIR references an outdated version of the American River Parkway Plan. The Draft MEIR references the 1985 plan. The American River Parkway Plan was updated in 2008. Therefore, the Draft MEIR is therefore revised as follows:
- ▲ Section 4.3, “Biological Resources,” (p. 4.3-19 immediately under the impact statement for Impact 4.3-10) and in the Executive Summary Table ES-1 (p. ES-8): City of Sacramento Tree Preservation Ordinance and American River Parkway Plan (~~December 1985~~2008).
- The Draft MEIR provides a general description of the type of policies in the American River Parkway Plan. The text change identified above does not alter the Draft MEIR’s description of these policies and does not alter the analysis or conclusions of the Draft MEIR. No further changes are necessary.
- A11-2 The commenter suggests that there is an inconsistency between the Environmental Setting summary in Draft MEIR Section 4.9, “Parks and Recreation,” and the description of the “Open Space, Parks, and Recreation” land use designation provided Draft MEIR Chapter 2, “Project Description.” After careful review of both sections of text, no inconsistency is noted. Draft MEIR Section 2 (p. 2-15) includes a description of the various general types of uses that fall under the 2035 General Plan “Open Space” and “Parks and Recreation” land use designations, and the Environmental Setting summary (which is a brief synopsis of the Environmental Setting provided in the Background Report, included as Appendix C of the Draft MEIR) provides a specific breakdown of all of the parks and recreation facilities that currently exist within the city. There is a necessary difference between the description of a general plan land use designation, which is broad and is intended to capture all appropriate and intended uses, and the description of the actual existing setting, which describes the specific facilities currently developed in the city. This difference is necessary and does not equate to an inconsistency. No changes to the text of the Draft MEIR are necessary.
- A11-3 The commenter indicates that the amount of potential parkland should not be used to justify a decrease in parkland requirements and suggests that creative solutions, such as “parklets” could qualify as park improvements. As described in Master Response 4.1.1, “Parks Service Level Master Response,” changes to the parkland service level standard are no longer proposed. Please refer to Master Response 4.1.1. Regarding creative solutions to increase parkland, several proposed policies require creative solutions to expand recreation opportunities within the City:
- ▲ **Policy ERC 2.2.6:** Urban Park Facility Improvements. In urban areas where land dedication is not reasonably feasible (e.g., the Central City), the City shall explore creative solutions to provide neighborhood park and recreation facilities (e.g., provision of community-serving recreational facilities in regional parks) that reflect the unique character of the area. (*MPSP*)
 - ▲ **Policy ERC 2.2.9:** Small Public Places for New Development. The City shall allow new development to provide small plazas, pocket parks, civic spaces and other gathering places that are available to the public, particularly in infill areas, to help meet recreational demands.
 - ▲ **Policy ERC 2.2.17:** Joint Use Facilities Co-Located. The City shall support the development of parks and recreation facilities co-located with public and private facilities (e.g., schools, libraries, and detention basins).

As recommended by the commenter, these policies require the City to explore and use creative solutions and alternative facilities to increase recreation opportunities in the City. No further response is necessary.

- A11-4 The commenter raises issues regarding the decrease in in-lieu fees associated with the proposed change in park service level standard. As described in Master Response 4.1.1, “Parks Service Level Master Response,” changes to the parkland service level standard are no longer proposed. Please refer to Master Response 4.1.1.
- A11-5 The commenter raises issues regarding the decrease in in-lieu fees associated with the proposed change in park service level standard and potential related impact to County Parks, especially the American River Parkway. As described in Master Response 4.1.1, “Parks Service Level Master Response,” changes to the parkland service level standard are no longer proposed. Please refer to Master Response 4.1.1.
- A11-6 The commenter suggests that the City intends to consider non-City recreation amenities as a contributing factor to park service level goals. This is not accurate. In order to remain conservative and to promote consistent application of the standard, the City’s park service level standard is based solely on the acreage of city-owned neighborhood and community parks. The city does not control parkland owned and operated by other agencies and therefore cannot guarantee their performance or existence in perpetuity. Please refer to Master Response 4.1.1.
- A11-7 The commenter raises a potential inconsistency between the proposed park service level standards and proposed General Plan policies related to development of parks and recreation facilities. As described in Master Response 4.1.1, “Parks Service Level Master Response,” changes to the parkland service level standard are no longer proposed. Please refer to Master Response 4.1.1.
- A11-8 The commenter suggests that the proposed change to park service level standards would limit the City’s ability to fund the creative park solutions identified in proposed General Plan Policies 2.2.6 through 2.2.17. As described in Master Response 4.1.1, “Parks Service Level Master Response,” changes to the parkland service level standard are no longer proposed. Please refer to Master Response 4.1.1.
- A11-9 The commenter raises issues regarding the decrease in in-lieu fees associated with the proposed change in park service level standard and affect to non-City owned and managed recreation facilities, such as the American River Parkway. As described in Master Response 4.1.1, “Parks Service Level Master Response,” changes to the parkland service level standard are no longer proposed. Please refer to Master Response 4.1.1.
- A11-10 The commenter indicates that decreasing the park requirements will allow growth without providing necessary parks. As described in Master Response 4.1.1, “Parks Service Level Master Response,” changes to the parkland service level standard are no longer proposed. Please refer to Master Response 4.1.1.

Letter
A12



EDMUND G. BROWN JR.
GOVERNOR

STATE OF CALIFORNIA
GOVERNOR'S OFFICE OF PLANNING AND RESEARCH
STATE CLEARINGHOUSE AND PLANNING UNIT



KEN ALEX
DIRECTOR

September 25, 2014

Scott Johnson
City of Sacramento
300 Richards Blvd.
Sacramento, CA 95811

Subject: 2035 General Plan Update
SCH#: 2012122006

Dear Scott Johnson:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on September 24, 2014, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,


Scott Morgan
Director, State Clearinghouse

Enclosures
cc: Resources Agency

1400 10th Street P.O. Box 3044 Sacramento, California 95812-3044
(916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov

A12-1

Document Details Report State Clearinghouse Data Base

SCH# 2012122006
Project Title 2035 General Plan Update
Lead Agency Sacramento, City of

Type EIR Draft EIR

Description The City of Sacramento ("City") is proposing a 2035 General Plan update (GPU), which includes focused updates of the City of Sacramento 2030 General Plan. The proposed GPU will document the City's progress in implementing the 2030 General Plan since 2009 and the Plan's policies and implementation programs to reflect changed conditions and new priorities. Specifically, the proposed GUP will address the following: update existing conditions information and data to 2012; update the planning horizon and revise projected growth estimates; support citywide economic development; refine transportation level of service (LOS) standards; map and report on historic resources; integrate climate action into the General Plan; address recent State mandate; update of the Housing Element; reflect past accomplishments and incorporate adopted amendments; support adopted and ongoing plans and initiatives; refine, consolidate, and prioritize General Plan implementation; and update goals, policies, and implementation programs to provide solutions to infrastructure, transportation, planning, and environmental challenges and to prioritize and streamline infrastructure investments for Shovel-Ready Tier 1 and Tier 2 Priority Areas. This proposed GPU is not considered a substantial overhaul to the existing General Plan, nor is it expected to result in Significant new development.

Lead Agency Contact

Name Scott Johnson
Agency City of Sacramento
Phone (916) 808-5842 **Fax**
email
Address 300 Richards Blvd.
City Sacramento **State** CA **Zip** 95811

Project Location

County Sacramento
City Sacramento
Region
Lat / Long
Cross Streets Citywide
Parcel No. All within City
Township **Range** **Section** **Base**

Proximity to:

Highways US 50, Route 51 (Bus. 80)
Airports McClellan, Executive
Railways UPRR
Waterways Sacramento and American River
Schools All
Land Use Within the City of Sacramento

Project Issues Aesthetic/Visual; Air Quality; Archaeologic-Historic; Biological Resources; Drainage/Absorption; Economics/Jobs; Fiscal Impacts; Flood Plain/Flooding; Forest Land/Fire Hazard; Geologic/Seismic; Minerals; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian; Growth Inducing; Landuse; Cumulative Effects; Other Issues

**Document Details Report
State Clearinghouse Data Base**

Reviewing Agencies Resources Agency; Department of Conservation; Department of Fish and Wildlife, Region 2; Delta Protection Commission; Cal Fire; Department of Parks and Recreation; Central Valley Flood Protection Board; Office of Emergency Services, California; California Highway Patrol; Caltrans, District 3 S; Department of Housing and Community Development; Air Resources Board; Regional Water Quality Control Bd., Region 5 (Sacramento); Native American Heritage Commission; Public Utilities Commission

Date Received 08/08/2014 **Start of Review** 08/11/2014 **End of Review** 09/24/2014

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY

EDMUND G. BROWN Jr., Governor

DEPARTMENT OF TRANSPORTATION
 DISTRICT 3 – SACRAMENTO AREA OFFICE
 2379 GATEWAY OAKS DRIVE, STE 150 - MS 19
 SACRAMENTO, CA 95833
 PHONE (916) 274-0635
 FAX (916) 263-1796
 TTY 711



Flex your power!
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September 24, 2014

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 4

032014-SAC-0165
 03-SAC-VAR
 SCH # 2012122006

Mr. Scott Johnson
 Community Development Department, Environmental Planning Services
 City of Sacramento
 300 Richards Blvd., 3rd Floor
 Sacramento, CA 95811

City of Sacramento 2035 General Plan Update – Draft Master Environmental Impact Report (DMEIR)

Dear Mr. Johnson:

Thank you for including the California Department of Transportation (Caltrans) in the review process for the City of Sacramento's 2035 General Plan Update (2035 GPU) DMEIR. The 2035 GPU DMEIR evaluates the full range of environmental issues contemplated for consideration under the California Environmental Quality Act (CEQA) and the CEQA Guidelines including, but not limited to, major issues with Transportation and Circulation under the jurisdiction of the City of Sacramento. The following comments are based on the 2035 GPU DMEIR.

General Plan Policies Related to Smart Transportation and Land Use

Caltrans commends the City of Sacramento on its policies related to improving multimodal transportation, establishing grid networks, removing accessibility barriers, creating walkable neighborhoods, and commitment to Transportation Demand Management strategies. These policies will help reduce reliance on automobile travel and help negate effects of urban sprawl on the transportation network. Caltrans also appreciates the commitment to freeway improvements when impacts to the freeway system are not able to be mitigated by other means.

Transportation and Circulation Section

On page 4.12-26 of the 2035 GPU DEIR, Table 4.12-4, for Impact 4.12-4, indicates implementation of the 2035 GPU DMEIR will introduce potentially significant impacts to the State Highway System (SHS). However, on page 4.12-27, the DMEIR concludes, despite Policy M 1.5.6 and the pending Program 17, that traffic impacts due to implementation of the 2035 GPU are considered significant

"Caltrans improves mobility across California"

Mr. Scott Johnson / City of Sacramento Community Development Department,
Environmental Planning Services
September 24, 2014
Page 2

and unavoidable. Caltrans disagrees with the conclusion because GPU traffic impacts can be reduced and/or mitigated by projects such as the Interstate 5 (I-5) High Occupancy Vehicle (HOV) Lane Project, I-5 / I-80 Connector Project and State Route 99 Ramp Metering projects. The above SHS improvements could benefit from fair-share contributions from new developments in the City. The City could also develop robust transit or parking reduction mitigation strategies to reduce impacts on the SHS to a less than significant level.

Caltrans notes that not all freeway segments within the city limits of Sacramento are proposed as concept Level of Service (LOS) F. Please refer to the latest Transportation Concept Reports for freeway corridors at the following address and update future documents accordingly:

<http://www.dot.ca.gov/dist3/departments/planning/systemplanningTCR.htm>

Encroachment Permit

Please be advised that any work or traffic control that would encroach onto the State Right of Way (ROW) requires an encroachment permit that is issued by Caltrans. To apply, a completed encroachment permit application, environmental documentation, and five sets of plans clearly indicating State ROW must be submitted to the address below:

Mr. Bruce Capaul
Caltrans, District 3, Office of Permits
703 B Street
Marysville, CA 95901

Traffic-related mitigation measures should be incorporated into the construction plans prior to the encroachment permit process. See the website at the following uniform resource locator for more information: <http://www.dot.ca.gov/hq/traffops/developserv/permits/>.

Safety Thresholds

Caltrans would like to work with the City of Sacramento to develop safety thresholds that can be used as a tool in determining a proposed project's potential for creating unsafe conditions for pedestrians, bicyclists, and motorists as a result of developmental impacts.

Senate Bill (SB) 743

SB 743 presents Vehicle Miles Traveled (VMT) as an alternative to LOS in measuring potential transportation related impacts of development projects and long range plans like the 2035 GPU. Caltrans encourages the City to use Program 17 as a case example for mitigating VMT impacts in the 2035 GPU, future developments, and other long range plans. Caltrans also encourages the City to consider using the I-5 Corridor Subregional Mitigation Program Memorandum of Understanding and upcoming nexus study as a model for Program 17. For instance, if a project will have VMT impacts that are considered significant under CEQA, the project proponent could make contributions to

"Caltrans improves mobility across California"

Mr. Scott Johnson / City of Sacramento Community Development Department,
Environmental Planning Services
September 24, 2014
Page 3

Program 17 based upon the development type. The projects in Program 17 could contain projects that would reduce regional VMT such as transit, walking, and bicycling improvements, and therefore satisfy CEQA requirements and legal nexus for project impacts. Caltrans would like to continue to work collaboratively with the City to establish new mitigation programs.

Transportation and Construction Induced Vibration

On page 4.8-2 the DMEIR discusses Caltrans' Transportation-and Construction-Induced Vibration Manual, that was published in 2004. The City of Sacramento should be aware that a newer September 2013 version of the Manual is available at:
http://www.dot.ca.gov/hq/env/noise/pub/TCVGM_Sep13_FINAL.pdf.

Please provide our office with copies of any further actions regarding this project. We would appreciate the opportunity to review and comment on any changes related to this development.

If you have any questions regarding these comments or require additional information please contact Arthur Murray, Intergovernmental Review Coordinator, at (916) 274-0616 or by email at: arthur.murray@dot.ca.gov.

Sincerely,



ERIC FREDERICKS, Chief
Office of Transportation Planning – South

c: Scott Morgan, State Clearinghouse

"Caltrans improves mobility across California"



CLEAR
9/24/14
?



Central Valley Regional Water Quality Control Board

9 September 2014

RECEIVED

SEP 10 2014

STATE CLEARINGHOUSE

Scott Johnson
City of Sacramento
300 Richards Boulevard
Sacramento, CA 95811

CERTIFIED MAIL
7013 1710 0002 3644 7754

COMMENTS TO REQUEST FOR REVIEW FOR THE DRAFT ENVIRONMENTAL IMPACT REPORT, 2035 GENERAL PLAN PROJECT, SCH NO. 2012122006, SACRAMENTO COUNTY

Pursuant to the State Clearinghouse's 11 August 2014 request, the Central Valley Regional Water Quality Control Board (Central Valley Water Board) has reviewed the *Request for Review for the Draft Environmental Impact Report* for the 2035 General Plan Project, located in Sacramento County.

Our agency is delegated with the responsibility of protecting the quality of surface and groundwaters of the state; therefore our comments will address concerns surrounding those issues.

Construction Storm Water General Permit

Dischargers whose project disturb one or more acres of soil or where projects disturb less than one acre but are part of a larger common plan of development that in total disturbs one or more acres, are required to obtain coverage under the General Permit for Storm Water Discharges Associated with Construction Activities (Construction General Permit), Construction General Permit Order No. 2009-009-DWQ. Construction activity subject to this permit includes clearing, grading, grubbing, disturbances to the ground, such as stockpiling, or excavation, but does not include regular maintenance activities performed to restore the original line, grade, or capacity of the facility. The Construction General Permit requires the development and implementation of a Storm Water Pollution Prevention Plan (SWPPP).

For more information on the Construction General Permit, visit the State Water Resources Control Board website at:
http://www.waterboards.ca.gov/water_issues/programs/stormwater/constpermits.shtml.

KARL E. LONGLEY ScD, P.E., CHAIR | PAMELA C. CREEDON P.E., BCEE, EXECUTIVE OFFICER
11020 Sun Center Drive #200, Rancho Cordova, CA 95670 | www.waterboards.ca.gov/centralvalley



2035 General Plan Project
Sacramento County

- 2 -

9 September 2014

Phase I and II Municipal Separate Storm Sewer System (MS4) Permits¹

The Phase I and II MS4 permits require the Permittees reduce pollutants and runoff flows from new development and redevelopment using Best Management Practices (BMPs) to the maximum extent practicable (MEP). MS4 Permittees have their own development standards, also known as Low Impact Development (LID)/post-construction standards that include a hydromodification component. The MS4 permits also require specific design concepts for LID/post-construction BMPs in the early stages of a project during the entitlement and CEQA process and the development plan review process.

For more information on which Phase I MS4 Permit this project applies to, visit the Central Valley Water Board website at:
http://www.waterboards.ca.gov/centralvalley/water_issues/storm_water/municipal_permits/.

For more information on the Phase II MS4 permit and who it applies to, visit the State Water Resources Control Board at:
http://www.waterboards.ca.gov/water_issues/programs/stormwater/phase_ii_municipal.shtml

Industrial Storm Water General Permit

Storm water discharges associated with industrial sites must comply with the regulations contained in the Industrial Storm Water General Permit Order No. 97-03-DWQ.

For more information on the Industrial Storm Water General Permit, visit the Central Valley Water Board website at:
http://www.waterboards.ca.gov/centralvalley/water_issues/storm_water/industrial_general_permits/index.shtml.

Clean Water Act Section 404 Permit

If the project will involve the discharge of dredged or fill material in navigable waters or wetlands, a permit pursuant to Section 404 of the Clean Water Act may be needed from the United States Army Corps of Engineers (USACOE). If a Section 404 permit is required by the USACOE, the Central Valley Water Board will review the permit application to ensure that discharge will not violate water quality standards. If the project requires surface water drainage realignment, the applicant is advised to contact the Department of Fish and Game for information on Streambed Alteration Permit requirements.

If you have any questions regarding the Clean Water Act Section 404 permits, please contact the Regulatory Division of the Sacramento District of USACOE at (916) 557-5250.

¹ Municipal Permits = The Phase I Municipal Separate Storm Water System (MS4) Permit covers medium sized Municipalities (serving between 100,000 and 250,000 people) and large sized municipalities (serving over 250,000 people). The Phase II MS4 provides coverage for small municipalities, including non-traditional Small MS4s, which include military bases, public campuses, prisons and hospitals.

2035 General Plan Project
Sacramento County

- 3 -

9 September 2014

Clean Water Act Section 401 Permit – Water Quality Certification

If an USACOE permit, or any other federal permit, is required for this project due to the disturbance of waters of the United States (such as streams and wetlands), then a Water Quality Certification must be obtained from the Central Valley Water Board prior to initiation of project activities. There are no waivers for 401 Water Quality Certifications.

Waste Discharge Requirements

If USACOE determines that only non-jurisdictional waters of the State (i.e., "non-federal" waters of the State) are present in the proposed project area, the proposed project will require a Waste Discharge Requirement (WDR) permit to be issued by Central Valley Water Board. Under the California Porter-Cologne Water Quality Control Act, discharges to all waters of the State, including all wetlands and other waters of the State including, but not limited to, isolated wetlands, are subject to State regulation.

For more information on the Water Quality Certification and WDR processes, visit the Central Valley Water Board website at:

http://www.waterboards.ca.gov/centralvalley/help/business_help/permit2.shtml.

Low or Limited Threat General NPDES Permit

If the proposed project includes construction dewatering and it is necessary to discharge the groundwater to waters of the United States, the proposed project will require coverage under a National Pollutant Discharge Elimination System (NPDES) permit. Dewatering discharges are typically considered a low or limited threat to water quality and may be covered under the General Order for *Dewatering and Other Low Threat Discharges to Surface Waters* (Low Threat General Order) or the General Order for *Limited Threat Discharges of Treated/Untreated Groundwater from Cleanup Sites, Wastewater from Superchlorination Projects, and Other Limited Threat Wastewaters to Surface Water* (Limited Threat General Order). A complete application must be submitted to the Central Valley Water Board to obtain coverage under these General NPDES permits.

For more information regarding the Low Threat General Order and the application process, visit the Central Valley Water Board website at:

http://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/general_orders/r5-2013-0074.pdf

For more information regarding the Limited Threat General Order and the application process, visit the Central Valley Water Board website at:

http://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/general_orders/r5-2013-0073.pdf

2035 General Plan Project
Sacramento County

- 4 -

9 September 2014

If you have questions regarding these comments, please contact me at (916) 464-4684 or
tcleak@waterboards.ca.gov.



Trevor Cleak
Environmental Scientist

cc: State Clearinghouse Unit, Governor's Office of Planning and Research, Sacramento

**Letter
A12
Response****State of California - Office of Planning and Research,
State Clearinghouse and Planning Unit**
Scott Morgan, Director
9-25-14

- A12-1 The comment indicates that the State Clearinghouse submitted the Draft MEIR to selected state agencies and that comments received have been forwarded. The comment acknowledges that the City complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to CEQA. The comment letters attached to the State Clearinghouse letter are addressed elsewhere in this Final EIR. The comment does not raise issues related to the adequacy of the Draft MEIR. No further response is necessary.

Sacramento Area
Council of
Governments

1415 L Street,
Suite 300
Sacramento, CA
95814

tel: 916.321.9000
fax: 916.321.9551
tdd: 916.321.9550
www.sacog.org



October 6, 2014

Remi Mendoza, Associate Planner
City of Sacramento
Community Development Department
300 Richards Blvd., 3rd Floor
Sacramento, CA 95814

Re: City of Sacramento Draft 2035 General Plan

Dear Mr. Mendoza:

Thank you for the opportunity to comment on City’s Draft 2035 General Plan Update. This five year update includes six key changes related to: urban agriculture, traffic level of service, parks acreage service level, flood protection, the City’s Climate Action Plan, and an update to growth projections. All of the changes proposed in each of these areas are positive changes and SACOG commends the City for its innovation and commitment to good planning. The comments provided in this letter will be focused on the proposed changes to the growth projections and consistency between the general plan and the regional transportation plan (2012 Metropolitan Transportation Plan/Sustainable Communities Strategy).

The City’s General Plan is scheduled to be updated every five years, in part to keep the Master Environmental Impact Report current and available for streamlined development review and implementation. An important part of that update cycle is to re-evaluate and update growth projections as necessary. We are pleased to see the City has done this as part of this update to the General Plan. Since the base year of the current 2030 General Plan was 2005, it is important to account for the recent recession and the significantly slowed recovery. “Dialing down” the projected population, housing, and job growth in the Draft 2035 General Plan Update reflects this change and is in alignment with the currently adopted 2012 Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS).

The 2012 MTP/SCS land use forecast is built from allowed uses in the 2030 General Plan. Because the majority of the development in the City is infill and the City and SACOG coordinated closely in the development of the 2012 MTP/SCS, development projects in the City that are consistent with the land use, density, and intensities allowed in the general plan, are likely to be consistent with the MTP/SCS as well. The area in the City that is covered by the Delta Secondary Zone is primarily infill (described in the MTP/SCS as Established Communities), but does also cover a portion of the Delta Shores Specific Plan (described in the MTP/SCS as a Developing Community). The 2012 MTP/SCS looks at Developing Communities as a whole and assumes a

- Auburn*
- Citrus Heights*
- Colfax*
- Davis*
- El Dorado County*
- Elk Grove*
- Folsom*
- Galt*
- Isleton*
- Lincoln*
- Live Oak*
- Loomis*
- Marysville*
- Placer County*
- Placerville*
- Rancho Cordova*
- Rocklin*
- Roseville*
- Sacramento*
- Sacramento County*
- Sutter County*
- West Sacramento*
- Wheatland*
- Winters*
- Woodland*
- Yolo County*
- Yuba City*
- Yuba County*

A13-1

consistency determination would be for the entire specific plan area rather than a portion of it. In the area of the Delta Shores specific plan, the MTP/SCS land use forecast is based on the adopted specific plan. Detailed assumptions can be found in Appendix E-3 of the 2012 MTP/SCS. Since there are no changes to the land uses in the Draft 2035 General Plan Update, the general plan and the MTP/SCS remain compatible.

A13-1
cont.

Thank you again for inviting SACOG's comment on the Draft 2035 General Plan.

Sincerely,



Mike McKeever
Chief Executive Officer

MM:JH:pm

**Letter
A13
Response****Sacramento Area Council of Governments (SACOG)**
Mike McKeever, Chief Executive Officer
10-6-14

- A13-1 The commenter commends the City for basing projected population, housing, and job growth on SACOG's currently adopted 2012 Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS). The comment further indicates that the proposed 2035 General Plan remains compatible with the MTP/SCS. This comment does not raise issues related to the adequacy of the Draft MEIR. No further response is necessary.

**Letter
A14**

From: Lockhart, Don [mailto:LockhartD@saccounty.net]
Sent: Monday, October 06, 2014 2:11 PM
To: Remi Mendoza
Cc: Tom Pace; Jim McDonald; Brundage, Peter
Subject: RE: City of Sacramento Draft 2035 General Plan

We have reviewed the Draft 2035 General Plan and offer the following brief comments.

Comment 1:

LU 1.1.8 Annexation Prior to City Services. Prior to the provision of City services to unincorporated areas, the City shall require those unincorporated properties be annexed into the City, or that a conditional service agreement be executed agreeing to annex when deemed appropriate by the City. (RDR)

A14-1

“Conditional service agreement” may also necessitate LAFCo approval of an out of area service extension (GC 56133), if the service is to a private party.

Comment 2:

LU 10.1.2 Comprehensive Planning for Special Study Areas.

A14-2

It may be helpful to note that pre-zoning of the affected territory will also have to occur.

Comment 3:

Figure SSA-6 Town of Freeport Study Area

A14-3

May be of benefit to show Delta Shores for development context.

Comment 4:

Table 4-2: Program 16. The City shall develop and adopt a comprehensive annexation plan. (MPSP)

A14-4

It may of benefit to include a statement that there are no identified disadvantaged unincorporated communities (DUCs) (per SB 244) that would be adversely impacted in the implementation of the proposed comprehensive annexation plan.

Thank you for the opportunity to review and provide these comments. Please feel free to contact me if anything further is needed.

Don Lockhart, AICP
Assistant Executive Officer
1112 I Street, Suite 100
Sacramento, CA 95814-2836
916.874.2937
916.854.9099 (FAX)
Don.Lockhart@SacLAFCo.org



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If you are not the intended recipient, please contact the sender immediately and permanently delete the original and any copies of this email and any attachments thereto.

Letter	Sacramento Local Agency Formation Commission (Sacramento LAFCo)
A14	Don Lockhart, AICP, Assistant Executive Officer
Response	10-6-14

- A14-1 Regarding Policy LU 1.1.8, “Annexation Prior to City Services,” the commenter indicates a conditional service agreement may require LAFCo approval. This comment does not contradict any information provided in the proposed 2035 General Plan or the Draft MEIR. The comment does not raise environmental issues or issues related to the adequacy of the Draft MEIR. No further response is necessary.
- A14-2 Regarding Policy LU 10.1.2, “Comprehensive Planning for Special Study Areas,” the commenter indicates that it may be helpful to note that pre-zoning of the affected territory will also have to occur. The comment relates to specific policy text and does not identify any issues related to the adequacy of the Draft MEIR, and no further response is necessary under CEQA. This comment will be provided to the decision makers for consideration; City staff’s response to this comment will be included as an appendix to the staff report.
- A14-3 Regarding 2035 General Plan Figure SSA-6, “Town of Freeport Study Area,” the commenter recommends showing Delta Shores for development context. This comment relates to a figure in 2035 General Plan Section 3, “Community Plan Areas and Special Study Areas.” This figure is accurate as shown and does not appear in the Draft MEIR. Therefore, the comment does not raise issues related to the adequacy of the Draft MEIR. No further response is necessary.
- A14-4 Regarding 2035 General Plan Table 4-2: Program 16, the commenter suggests adding a statement to the program indicating there are no disadvantaged unincorporated communities that would be impacted in the implementation of the proposed comprehensive annexation plan. The comment relates to specific policy text and does not identify any issues related to the adequacy of the Draft MEIR, and no further response is necessary under CEQA. This comment will be provided to the decision makers for consideration; City staff’s response to this comment will be included as an appendix to the staff report.



Letter A15

3344 Mission Avenue, Carmichael, CA 95608
 Telephone: 916.488.2810
 Fax: 916.488.4349 www.morpd.com

October 6, 2014

Scott Johnson, Associate Planner
 City of Sacramento, Community Development Department
 Environmental Planning Services
 300 Richards Boulevard, Third Floor
 Sacramento, CA 95811

Re: City of Sacramento 2035 General Plan

Dear Mr. Johnson:

The Mission Oaks Recreation and Park District, a Sacramento County dependent special district, borders the City of Sacramento along portions of our south and west boundaries. Due to this close proximity, some of our parks and programs are utilized by City residents. While it is expected and normal for individuals to travel among various recreation and park agencies to fulfill their recreational needs, the City's proposal to decrease park land dedication will have a significant impact on the Mission Oaks Recreation and Park District.

Since Mission Oaks District was formed in 1975, we have searched for opportunities to add acreage to the park system in order to meet a standard of five acres per 1000 population. Because of this deficiency, some of our neighborhood and community parks are already impacted with heavy usage. We believe the City's Master Plan Environment Impact Report has not thoroughly addressed the proposed decrease in its own park land dedication and the future impact the decrease in City park land and park maintenance will pose to neighboring park districts.

Mission Oaks is hopeful the City will consider long-term stewardship of its parks and park lands prior to approval of the 2035 General Plan Document, and will be aware of its effect on parks in the greater Sacramento area, and not just the City of Sacramento.

Respectfully,


 Eric Milstein, Chair
 Advisory Board of Directors, Mission Oaks Recreation and Park District

Cc: Sacramento County Board of Supervisors
 City of Sacramento City Council
 City of Sacramento Parks and Recreation Commission

A15-1



Letter A15 Response	Mission Oaks Recreation and Park District Eric Milstein, Chair 10-6-14
------------------------------------	-------------------------------------------------------------------------------------

- A15-1 The commenter is concerned with impacts to non-City parks associated with the proposed change to park service level standard. As described in Master Response 4.1.1, “Parks Service Level Master Response,” changes to the parkland service level standard are no longer proposed. Please refer to Master Response 4.1.1.

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Individuals

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Letter
11



Open House for the Sacramento 2035 General Plan Update

September 3, 5:30 p.m.

2035 General Plan Comments

Please hand in during the meeting or mail (address on back)

Name: Sharon Palmer

Organization (if any): NNPC

Address (optional): _____

City, State, Zip: SACTO

E-mail: _____

The City of Sacramento invites you to provide comments on the Draft 2035 General Plan. Thank you!

Comments

- * 1) Absolutely keep the parks average service level
 5) Five acres per 1,000 population
 Make no reduction of fees to developers 11-1
- 2) Make all haste in the flood protection.
 We have for years worked toward this goal, we paid
 and watched the date extend. 11-2
- 3) Happy to have urban agriculture 11-3

**Letter
I1
Response****Sharon Billings**
No date

-
- I1-1 The comment raises issues with the proposed change to park service level standard. As described in Master Response 4.1.1, “Parks Service Level Master Response,” changes to the parkland service level standard are no longer proposed. Please refer to Master Response 4.1.1.
- I1-2 The comment raises issues regarding the pace of flood protection. This comment does not raise issues related to the adequacy of the Draft MEIR. No further response is necessary.
- I1-3 The comment expresses support of the proposed urban agriculture policies. This comment does not raise issues related to the adequacy of the Draft MEIR. No further response is necessary.

Letter
12



Open House for the Sacramento 2035 General Plan Update

September 3, 5:30 p.m.

2035 General Plan Comments

Please hand in during the meeting or mail (address on back)

Name: JULIA BROOKOWSKI
Organization (if any): —
Address (optional): 2501 Cantara Way
City, State, Zip: Sacramento CA 95835
E-mail: _____

The City of Sacramento invites you to provide comments on the Draft 2035 General Plan. Thank you!

Comments

The proposed changes to the PARK ACREAGE Service Level seems extreme and appears to favor developers as opposed to residents who live in the areas.

I live in Natomas Park and have been here since 2000. The 200+ acre ^{regional} park that had been promised to us (and used as a Marketing Tool) took YEARS to get to the point it is at now. A bike/walking path, some ball fields, and a dog park. Hardly the centerpiece of our community, as promised. ~~By~~ We have seen many of the promised amenities either cut back, delayed, or shelved altogether. This decrease in service level for our parks is shameful and is not the right

12-1

more for our Community. Other cities have not cut back on their park acreage, and

More space on back

is possibly the reason why many of our neighbors in Natomas are moving away to Roseville and Folsom.

We have stood by and watched as ^{other} plans have changed over the past 15 years - more apartments, ~~to~~ fewer stores, ~~park~~ open areas not being maintained, etc.

If the city really wants to be a World Class City, our Parks should Be a priority.

FOLD HERE

I2-1
cont.

Place
Stamp
Here

Remi Mendoza
Associate Planner
City of Sacramento Community Development Department
300 Richards Blvd., Third Floor
Sacramento, CA 95811

FOLD HERE

**Letter
I2
Response****Julia Brootkowski**
No date

-
- I2-1 The comment raises issues with the proposed change to park service level standard. As described in Master Response 4.1.1, “Parks Service Level Master Response,” changes to the parkland service level standard are no longer proposed. Please refer to Master Response 4.1.1.

Letter
13

Chris Brown
3135 43rd St
Sacramento, CA 95817

Scott Johnson, Associate Planner
City of Sacramento, Community Development Department
Environmental Planning Services
300 Richards Boulevard, Third Floor
Sacramento, CA 95811
SRJohnson@cityofsacramento.org

Dear Mr. Johnson,

These Comments are to address a few deficiencies in the Draft MEIR on the GPU 2035 regards to water, especially as it relates to climate change.

The Plan has a number of critically important subsections on water, which is appropriate given the impacts of water use on our city’s health and safety and the fact that water use in California contributes to approximately 20% of energy use statewide according to the California Energy Commission.

The facts are that the drought which we are currently suffering through is both a multi-year drought, and the worst single drought year in history; that population is projected to grow, and we are likely to have significantly drier years in the future, and it is unlikely that any new sources of wet water will be available. Increased efficiency and the reuse and recycle of municipal water are the most cost-effective new supplies.

That the scope of the GPU is until 2035, but the water conservation goal ends in 2020. In 2013 the Governor published a California Water Action Plan which called for deeper cuts in per capita water use beyond the 2020 horizon recognizing that continued improvements in water use efficiency are both achievable and necessary if we are to reduce our carbon footprint and live in within the limits of our foreseeable supplies. The Plan¹ was finalized in January 2014. I recommend you incorporate at least a 30% cut in per capita consumption, rather than the 4% reduction in overall use which is included in the GP.

The stormwater abatements sections need to include permeable pavers and curb cuts; as part of new development and for programs aimed at current developed areas to encourage the replacement of concrete sidewalks and driveways with permeable pavers.

The use of curb cuts² and rain gardens to slow and adsorb rain water into the soils will both reduce pollution, and to save on landscape irrigation, a waste of water, and of energy used in pumping that

I3-1
I3-2

¹ http://resources.ca.gov/california_water_action_plan/

² <http://tdot.tucsonaz.gov/tdot/stormwater-management>; <https://www.newbergoregon.gov/engineering/519-rain-drain-curb-cut-standard-detail>

water. Examples from Tucson, Arizona and Newberg, Oregon are included in the footnote to illustrate how other cities are using curb cuts and rain water harvesting to reduce stormwater pollution and irrigation simultaneously. The Plan and MEIR should call out and evaluate the use of neighborhood-scale collector streets also sometimes known as green streets which can harvest rainwater in large subsurface cisterns to be used for summer water needs. See great examples from Tree People's and Center for Watershed Health's collaborations with LADWP cited below³.

I
13-2
cont.
I

Thanks for consideration of these points, and I hope you can incorporate them in the 2035 GPU.

Sincerely,



Chris Brown

³ <http://www.treepeople.org/cistern>; <http://watershedhealth.org/programsandprojects/was.aspx?search=elmer>

**Letter
I3
Response**

Chris Brown
No date

- I3-1 The commenter raises issues regarding water supply and water conservation in light of the current drought. The commenter suggests 30 percent cut in per capita consumption. As described in Draft MEIR Section 4.11, “Public Utilities,” (See discussions under Impact 4.11-1 and 4.11-2) (p. 4.11-8), the primary constraint for provision of water in the City is not water rights, but water treatment capacity during Hodge Flow conditions. Regarding water conservation, the City is implementing the State’s 20x2020 Water conservation Plan, which includes a 20 percent water conservation reduction. Even an increase in water conservation to 30 percent would not resolve the water supply issue. As described in the Draft MEIR, the City has identified several solutions for the treatment capacity issue.
- ▲ Construction of a new water treatment plant on the Sacramento River in Natomas, north of the City’s present SRWTP, within the vicinity of Sacramento International Airport, commonly called the Natomas Water Treatment Plan (NTWP).
 - ▲ Construction of a raw water pipeline to pump flow back from the Sacramento River to the FWTP for treatment and distribution, commonly called the Pumpback.
 - ▲ The expansion of the Sacramento River Water Treatment Plant.
- Implementation of any of these options would likely result in environmental impacts. The Draft MEIR concludes that because the treatment method has not been selected and because likely significant environmental effects would result, the impact is considered significant and unavoidable. As mentioned above, an increase in water conservation would not avoid or reduce the severity of this impact. However, the City will continue to comply with the State requirements for water conservation.
- Water conservation is appropriately addressed in the proposed 2035 General Plan and the Draft MEIR. No further response is necessary.
- I3-2 The commenter identifies specific design measures to reduce the rate of stormwater runoff and increase infiltration and stormwater quality. The proposed 2035 General Plan includes several policies aimed to achieve these same goals. See below.
- ▲ **Policy ER 1.1.3:** Stormwater Quality. The City shall control sources of pollutants and improve and maintain urban runoff water quality through stormwater protection measures consistent with the city’s National Pollution Discharge Elimination System (NPDES) Permit.
 - ▲ **Policy ER 1.1.4:** New Development. The City shall require new development to protect the quality of water bodies and natural drainage systems through site design (e.g., cluster development), source controls, storm water treatment, runoff reduction measures, best management practices (BMPs) and Low Impact Development (LID), and hydromodification strategies consistent with the city’s NPDES Permit.
 - ▲ **Policy ER 1.1.5:** Limit Stormwater Peak Flows. The City shall require all new development to contribute no net increase in stormwater runoff peak flows over existing conditions associated with a 100-year storm event.

- ▲ **Policy ER 1.1.6:** Post-Development Runoff. The City shall impose requirements to control the volume, frequency, duration, and peak flow rates and velocities of runoff from development projects to prevent or reduce downstream erosion and protect stream habitat.

Because of the inherently “general” nature of a General Plan, specific design measures, such as those identified by the commenter are not called out in these policies; however, these types of design measures and similar best management practices (BMPs) would be available as part of a menu of LID strategies that would be available for incorporation into specific projects consistent with the city’s NPDES Permit. The specific type of LID strategies often depends on the specific project site characteristics and the type of project. The comment does not raise issues related to the adequacy of the Draft MEIR. No further response is necessary.

Letter
14



Open House for the Sacramento 2035 General Plan Update

September 3, 5:30 p.m.

2035 General Plan Comments

Please hand in during the meeting or mail (address on back)

Name: LISA KAPLAN

Organization (if any): Natomas School Board

Address (optional): 500 Hawkcrest Cir

City, State, Zip: Sac Ca 95835

E-mail: Kaplan4Kids@yahoo.com

The City of Sacramento invites you to provide comments on the Draft 2035 General Plan. Thank you!

Comments

I oppose park reduction change. As a Board member we try to win w/ city when building a school to have it next to the park.

Less space for a park is less space for our kids and community.

Developers can afford the cost of a park & the community benefit outweighs any cost.

Don't reduce our park space in the name of saving money - that is a very poor policy.

14-1

**Letter
I4
Response****Lisa Kaplan**
No date

-
- I-41 The comment raises issues with the proposed change to park service level standard. As described in Master Response 4.1.1, “Parks Service Level Master Response,” changes to the parkland service level standard are no longer proposed. Please refer to Master Response 4.1.1.

Letter
15



Open House for the Sacramento 2035 General Plan Update

September 3, 5:30 p.m.

2035 General Plan Comments

Please hand in during the meeting or mail (address on back)

Name: Beth Mahony
 Organization (if any): MN Regional Park, Parks + School Committee
 Address (optional): 2375 Burberry Way
 City, State, Zip: Sac 95835
 E-mail: tbmahony@hotmail.com

The City of Sacramento invites you to provide comments on the Draft 2035 General Plan. Thank you!

Comments

Please do not lower the amount that developers pay in Quimby Fees. Our parks rely on these funds to build and maintain our parks. If you lower the fees than all users of the parks will suffer.

The argument that Developers will not come to Sac is crazy. Once the moratorium is lifted developers will flock to our area. Sac's Quimby fee are the same as Roseville Folsom and other larger cities. Lowering these fees will hurt Sac and our much used parks.

15-1

**Letter
15
Response****Beth Mahony**
No date

-
- 15-1 The comment raises issues with the proposed change to park service level standard. As described in Master Response 4.1.1.1, “Parks Service Level Master Response,” changes to the parkland service level standard are no longer proposed. Please refer to Master Response 4.1.1.

Letter
16



Open House for the Sacramento 2035 General Plan Update

September 3, 5:30 p.m.

2035 General Plan Comments

Please hand in during the meeting or mail (address on back)

Name: Brett Ramsdell

Organization (if any): _____

Address (optional): 5100 Bessemer Ct.

City, State, Zip: SACRAMENTO CA 95835

E-mail: brettramsdell@sbcglobal.net

The City of Sacramento invites you to provide comments on the Draft 2035 General Plan. Thank you!

Comments

I Am AGAINST lowering the impact fees that developers pay until we've finished building the N. Natomas Regional Park, a community center & an Aquatic Center in North Natomas. We should be using Quimby fees to build better AND safer bike trails AND to improve AND renovate existing parks.

When we moved here in 2000 there was a plan for development that seems to have been discarded. There was going to be a light rail system going to a town center. There were going to be bike trails to make it easy & safe to get around town. There was going to be low income, single family housing spread throughout the area. We were going to have a 200 acre regional park in the area in addition to all of the city parks.

All of this takes money that was to come from the developer as the homes & businesses were built.

I6-1

unfortunately the developers have been able to lower their costs and increase their profits by reducing the fees and services that were planned. Instead of single family low income housing we ^{More space on back} have huge Apartment complex. The Regional Park is 10%-20% built. There is no community center or Aquatic center in North Natoma. The bike trails are incomplete and often dangerous places to ride. No light rail, no town center. There is a lot of unfinished business in North Natoma. It doesn't make sense to me to cut the fees that were designed to build these projects. I urge you to reject the lowering of the Quimby fees until those projects are complete.

I6-1
cont.

FOLD HERE

Place
Stamp
Here

Remi Mendoza
Associate Planner
City of Sacramento Community Development Department
300 Richards Blvd., Third Floor
Sacramento, CA 95811

FOLD HERE

**Letter
I6
Response****Brett Ramsdell**
No date

-
- I6-1 The comment raises issues with the proposed change to park service level standard. As described in Master Response 4.1.1, “Parks Service Level Master Response,” changes to the parkland service level standard are no longer proposed. Please refer to Master Response 4.1.1.

Letter
17



Open House for the Sacramento 2035 General Plan Update

September 3, 5:30 p.m.

2035 General Plan Comments

Please hand in during the meeting or mail (address on back)

Name: Diane Ramsdell

Organization (if any): Natomas Homeowner

Address (optional): 5100 Bessemer Ct

City, State, Zip: Sac Ca 95835

E-mail: d.ramsdell@sbcglobal.net

The City of Sacramento invites you to provide comments on the Draft 2035 General Plan. Thank you!

Comments

When I moved here in 2000 we were promised a Regional Park - a major factor in our decision to move to Natomas. 14 years later not much of a Regional Park. Neighborhood Parks are used constantly. I urge you to reconsider your proposal to reduce acres per resident and to reduce Quinby fees. As Quinby fees were collected for the North Natomas Regional Park and it has taken 14 yrs. to see any progress made - why would you lower it? Many of our neighbors have moved to Roseville / Rocklin as they are much more Park friendly.

Thank you

17-1

**Letter
17
Response****Diane Ramsdell**
No date

-
- 17-1 The comment raises issues with the proposed change to park service level standard. As described in Master Response 4.1.1, “Parks Service Level Master Response,” changes to the parkland service level standard are no longer proposed. Please refer to Master Response 4.1.1.

**Letter
18
Response****Monica Robinson**
No date

-
- 18-1 The comment raises issues with the proposed change to park service level standard. As described in Master Response 4.1.1, “Parks Service Level Master Response,” changes to the parkland service level standard are no longer proposed. Please refer to Master Response 4.1.1.

**Letter
I9
Response****Rosemarie Ruggien**
No date

-
- I9-1 The comment raises issues with the proposed change to park service level standard. As described in Master Response 4.1.1, “Parks Service Level Master Response,” changes to the parkland service level standard are no longer proposed. Please refer to Master Response 4.1.1.

Letter
110



Open House for the Sacramento 2035 General Plan Update

September 3, 5:30 p.m.

2035 General Plan Comments

Please hand in during the meeting or mail (address on back)

Name: Katherine Taylor

Organization (if any): concerned parent + former teacher (South Sacramento)

Address (optional): 1619 Danbrook Drive

City, State, Zip: Sacramento, CA 95835

E-mail: Katherine.taylor@gmail.com
 ↑ no last "n"

The City of Sacramento invites you to provide comments on the Draft 2035 General Plan. Thank you!

Comments

Please don't reduce our park acreage or the fees to support our parks! The developers will build and take their profits while our communities suffer.

We still need to complete many parks in North Natomas and many other areas of the city need maintenance funds / rehabilitation funds.

One reason my family bought our house and joined our community was the North Natomas Community Park. All families deserve beautiful, well maintained parks!

110-1

**Letter
I10
Response****Katherine Taylor**
No date

-
- I10-1 The comment raises issues with the proposed change to park service level standard. As described in Master Response 4.1.1, “Parks Service Level Master Response,” changes to the parkland service level standard are no longer proposed. Please refer to Master Response 4.1.1.

Letter
111



Open House for the Sacramento 2035 General Plan Update

September 3, 5:30 p.m.

2035 General Plan Comments

Please hand in during the meeting or mail (address on back)

Name: Roberta Urbanik

Organization (if any): North Nat. Reg. Park Bd.

Address (optional): 9141 Promiser Way

City, State, Zip: Sacramento, CA - 95835

E-mail: robrienow@cox.net

The City of Sacramento invites you to provide comments on the Draft 2035 General Plan. Thank you!

Comments Re: Parks Acreage Service Level

Foresee serious, irreparable consequences if these

proposed compromises (acre-to-pop. calculations &

related Quimby fees) are enacted.

See attached ^{my documents} for further explanations

111-1

**Letter
I11
Response****Roberta Urbanik**
No date

-
- I11-1 The comment raises issues with the proposed change to park service level standard. As described in Master Response 4.1.1, “Parks Service Level Master Response,” changes to the parkland service level standard are no longer proposed. Please refer to Master Response 4.1.1.

Letter
112

September 7, 2014

To: City of Sacramento

From: Roberta Urbanik
Monica Robinson
2141 Promise Way, Sacramento, CA, 95835

Re: Request not to decrease parks 5-acre-per-population calculation and Quimby Park fees

Protecting Our City Parks With Wisdom, Courage, and Persistence

At my seventy-seven years of age, and as a member of Friends of the North Natomas Regional Park, I recognize that this is a precious moment in time that requires us to exercise vision, courage, and persistence as we resist the proposed alterations of park acreage calculations and related fees currently proposed by the city of Sacramento.

I think my great-great grandparents must have faced similar challenges in Santa Barbara, Santa Monica, and San Diego when they set up solid guidelines for the protections of their open spaces and parks all those years ago. And how grateful we can be both to them for their vision and to those generations of community leaders who subsequently protected those lands and guidelines.

I grew up and raised my daughter in two separate California communities that have built for generations on respect for the beauties and bounties of open spaces that continue to exist because of perpetual and wise park protection.

Over the decades I have lamented the insidiously little ways that urban sprawl has overtaken so many promising sections of California, like weeds, choking out the parks and open spaces that nourish a community.

Residents of such sickened communities now board buses or drive their cars to be refreshed in older communities that have wisely and courageously preserved the nourishments of their natural bounties in their parks. We have the opportunity here and now to bequeath similar nourishing, dedicated land to the next generations.

But, as Rosemarie Ruggieri and Angelique Ashby have clearly explained, there currently threatens a domino-like assault on the promising potential of our city parks, including the North Natomas region, where the roots of my family are now firmly planted. This relatively young community actively reflects Northern California pride and vision. In so many ways I have heard community members and leaders here speak with aversion to urban sprawl, a phrase used with negative synonym references to Southern California shortsightedness.

112-1

Now, more than ever, we need to know that the city of Sacramento will continue to work with us through park management that does not compromise the plans and objectives that our residents and leaders have been led to believe would remain in place.

I12-1
cont.

Sincerely submitted:


Roberta Urbanik


Monica Robinson

**Letter
I12
Response****Roberta Urbanik
9-7-14**

- I12-1 The comment raises issues with the proposed change to park service level standard. As described in Master Response 4.1.1, "Parks Service Level Master Response," changes to the parkland service level standard are no longer proposed. Please refer to Master Response 4.1.1.

**Letter
I13**

Remi Mendoza

From: Caryne Anglin <caryneanglin@gmail.com>
Sent: Monday, September 15, 2014 10:26 AM
To: sacgp
Subject: Re: Do not reduce our Quimby Park fee acreage

To our representatives from the City,

I recently attended the City’s workshop re: 2035 plan at Natomas Community Center. I see many positive things planned for our future, however, I’d like to address two concerns I have:

1) I strongly oppose the reduction of the Quimby Park Acreage Fees. Sacramento’s parks are the reason I moved here 30 years ago and I don’t want to see the protections we have in place reduced in order to favor development. Yes, we want to draw reasonable development to the area, but developers are already attracted to this region, and lowering the Quimby fees will not make a beneficial difference. Lowering these fees, however, will have a huge negative impact on the development and maintenance of parks in Sacramento. We have an obligation to honor our history and preserve them.

I13-1

2) We do not want a light rail on Truxel Road. This issue came up in the early 2000’s - Natomas residents vehemently opposed it then and we oppose it now. We support the original plan of a park & ride at I-5, which we know is expensive, but it is also expensive to run a bridge for the train over the river to bring it up Truxel, which only serves a small section of the community that cannot not financially support it. The Truxel run is a waste of money that will not only damage the character of Natomas but brings in added crime and concerns for the safety of children attending schools in the immediate area. No Light Rail on Truxel! Yes to the I-5 Park & Ride!

I13-2

Thank you for your consideration.

Caryne & Don Anglin
Natomas

**Letter
I13
Response****Caryne and Don Anglin
9-15-14**

- I13-1 The comment raises issues with the proposed change to park service level standard. As described in Master Response 4.1.1, "Parks Service Level Master Response," changes to the parkland service level standard are no longer proposed. Please refer to Master Response 4.1.1.
- I13-2 The comment opposes light rail on Truxel Road and supports a park-and-ride at Interstate 5 (I-5). This comment raises policy issues. The comment does not raise issues related to the adequacy of the Draft MEIR. No further response is necessary.

**Letter
114**

Remi Mendoza

From: Catherine Kungu <raha916@gmail.com>
Sent: Monday, September 15, 2014 12:51 PM
To: sacgp
Subject: Public comment-Do not reduce our Quimby Park fee acreage

To whom it may concern,

Please note our objection to the reduction our Quimby Park fee acreage. It hurts the long term financial viability of our parks which in turns hurts the residents. Please reconsider your vote not to reduce the Quimby park fees. I 114-1

Sincerely,

Catherine Kungu

Sent from my iPhone

**Letter
I14
Response****Catherine Kungu
9-15-14**

- I14-1 The comment raises issues with the proposed change to park service level standard. As described in Master Response 4.1.1, “Parks Service Level Master Response,” changes to the parkland service level standard are no longer proposed. Please refer to Master Response 4.1.1.

**Letter
115**

Remi Mendoza

From: Cat Bening <cat_bening@yahoo.com>
Sent: Monday, September 15, 2014 1:20 PM
To: sacgp
Subject: Quimby Park fee

To whom it may concern,

Please note our objection to the reduction our Quimby Park fee acreage. It hurts the long term financial viability of our parks which in turns hurts the residents. Please reconsider your vote not to reduce the Quimby park fees.] 115-1

Sincerely,
Cat Bening Stadler

**Letter
I15
Response****Cat Bening Stadler
9-15-14**

- I15-1 The comment raises issues with the proposed change to park service level standard. As described in Master Response 4.1.1, “Parks Service Level Master Response,” changes to the parkland service level standard are no longer proposed. Please refer to Master Response 4.1.1.

Letter
116

Remi Mendoza

From: Stadler, Mark <mark.stadler@verizon.com>
Sent: Monday, September 15, 2014 1:22 PM
To: sacgp
Subject: Quimby Park fee

To whom it may concern,

Please note our objection to the reduction our Quimby Park fee acreage. It hurts the long term financial viability of our parks which in turns hurts the residents. Please reconsider your vote not to reduce the Quimby park fees. I 116-1

Sincerely,

Mark Stadler
Verizon
916-202-0668

**Letter
I16
Response****Mark Stadler
9-15-14**

- I16-1 The comment raises issues with the proposed change to park service level standard. As described in Master Response 4.1.1, “Parks Service Level Master Response,” changes to the parkland service level standard are no longer proposed. Please refer to Master Response 4.1.1.

**Letter
117**

Remi Mendoza

From: Lara Lance <laralancedesigns@gmail.com>
Sent: Tuesday, September 16, 2014 10:31 AM
To: sacgp
Cc: Rosemarie Ruggieri
Subject: Please, please do not reduce Quimby requirements

A vote to reduce Quimby requirements would be a travesty. Sacramento should do every thing it can to plan for the best quality of life for its residents. A vote to reduce the requirements would demonstrate the city council's failure to care for the public good and its valuing of business interests above that good

I 117-1

**Letter
I17
Response****Lara Lance
9-16-14**

- I17-1 The comment raises issues with the proposed change to park service level standard. As described in Master Response 4.1.1, “Parks Service Level Master Response,” changes to the parkland service level standard are no longer proposed. Please refer to Master Response 4.1.1.

**Letter
I18**

Remi Mendoza

From: Lara Vincent Callesen <lara3400@sbcglobal.net>
Sent: Friday, September 19, 2014 11:48 AM
To: sacgp
Subject: Public comment - Do not reduce our Quimby Park fee acreage.

Public comment - Do not reduce our Quimby Park fee acreage.

I I18-1

**Letter
I18
Response****Lara Vincent Callesen
9-19-14**

- I18-1 The comment raises issues with the proposed change to park service level standard. As described in Master Response 4.1.1, “Parks Service Level Master Response,” changes to the parkland service level standard are no longer proposed. Please refer to Master Response 4.1.1.

**Letter
119**

Remi Mendoza

From: CARDENAS, CARRI Y GG-12 USAF AFISRA 548 OSS/OSK <carri.cardenas.1@us.af.mil>
Sent: Friday, September 19, 2014 1:36 PM
To: sacgp
Subject: Public comment - Do not reduce our Quimby Park fee acreage

Do not reduce our Quimby Park fee acreage.

I 119-1

v/r

//SIGNED//
Carri Cardenas, GG-12, DAF
SIGINT Program Manager, 548 OSS
DSN: 368-7927 Comm: (530) 634-7927

**Letter
I19
Response**

**Carri Cardenas
9-19-14**

- I19-1 The comment raises issues with the proposed change to park service level standard. As described in Master Response 4.1.1, “Parks Service Level Master Response,” changes to the parkland service level standard are no longer proposed. Please refer to Master Response 4.1.1.

Letter
120

Remi Mendoza

From: Tina C <t.cota@sbcglobal.net>
Sent: Friday, September 19, 2014 12:42 PM
To: sacgp
Subject: Public comment - Do not reduce our Quimby Park fee acreage

Dear City Council –

Natomas was promised a lot of things. These promises were the reason many people moved into Natomas. One of these promises were parks. All development thus far equate to that many parks already developed unless the City already used those funds for other unrestricted uses other than Natomas parks.

If developers want to develop out here and/or finish their projects, they should pay the park fees as originally planned and promised to the residents of Natomas.

We have a big voting power out here. You have already taken the arena from the local businesses. Now you want to take away our parks. I don't think so.

I disagree on reducing the Quimby Park fee acreage. If want our future votes, you will also disagree.

Concerned Natomas resident,

Tina Cota

I20-1

**Letter
I20
Response**

**Tina Cota
9-19-14**

- I20-1 The comment raises issues with the proposed change to park service level standard. As described in Master Response 4.1.1, “Parks Service Level Master Response,” changes to the parkland service level standard are no longer proposed. Please refer to Master Response 4.1.1.

**Letter
I21**

Remi Mendoza

From: soulmagicbabe@yahoo.com
Sent: Friday, September 19, 2014 11:55 AM
To: sacgp
Subject: Quimbly park. Pls do not reduce acreage

Please accept my comment - Do not reduce our Quimby Park acreage. Thank you!!

I I21-1

Crystal freeman
Natomas park resident

**Letter
I21
Response****Crystal Freeman
9-19-14**

- I21-1 The comment raises issues with the proposed change to park service level standard. As described in Master Response 4.1.1, “Parks Service Level Master Response,” changes to the parkland service level standard are no longer proposed. Please refer to Master Response 4.1.1.

Letter
122

Remi Mendoza

From: alan haynes <alan_haynes@hotmail.com>
Sent: Friday, September 19, 2014 6:34 PM
To: sacgp
Subject: Public comment-Do not reduce our Quimby Park fee acreag

Hello,

I am a North Natomas resident and I want to voice my opposition to the city of Sacramento's proposed reduction of Quimby park fee acreage.

Our parks are well-used and are a valuable part of our community. I do not support any efforts that will reduce the resources we need to maintain and build our parks. If these fees are reduced, I can imagine having to make up the difference to properly support our parks through passing a local bond. Besides, developers won't need this additional incentive to build in Natomas once building resumes.

I
I22-1

Alan Haynes
30 Alazar Ct
916-202-9473

Sent from my iPhone

**Letter
I22
Response****Alan Haynes
9-19-14**

- I22-1 The comment raises issues with the proposed change to park service level standard. As described in Master Response 4.1.1, “Parks Service Level Master Response,” changes to the parkland service level standard are no longer proposed. Please refer to Master Response 4.1.1.

**Letter
123**

Remi Mendoza

From: lisa haynes <lm_haynes@hotmail.com>
Sent: Friday, September 19, 2014 3:44 PM
To: sacgp
Subject: Public comment - Do not reduce our Quimby Park fee acreage

Hello,

As a resident of the Natomas community, I am emailing to ask you not to reduce our Quimby Park fee acreage. The parks are very well used in our neighborhood and it would be a huge disservice to our community to lose any existing or planned acreage.

I 123-1

Thank you,

Lisa Haynes
Natomas Park Resident

"It's not what you look at that matters, it's what you see."
~Henry David Thoreau~

**Letter
I23
Response****Lisa Haynes
9-19-14**

- I23-1 The comment raises issues with the proposed change to park service level standard. As described in Master Response 4.1.1, “Parks Service Level Master Response,” changes to the parkland service level standard are no longer proposed. Please refer to Master Response 4.1.1.

Letter
124

Remi Mendoza

From: Kym Hoffman <kymhoffman@gmail.com>
Sent: Friday, September 19, 2014 5:23 PM
To: sacgp
Subject: Public comment - Do not reduce our Quimby Park fee acreage

I 124-1

Thank you!

--

.....
Kym Hoffman, MNPL | 916.806.2826
Let's Connect: www.linkedin.com/in/kymhoffman

**Letter
I24
Response****Kym Hoffman
9-19-14**

- I24-1 The comment raises issues with the proposed change to park service level standard. As described in Master Response 4.1.1, “Parks Service Level Master Response,” changes to the parkland service level standard are no longer proposed. Please refer to Master Response 4.1.1.

Letter
125

Remi Mendoza

From: CJ Jones <numbers218@yahoo.com>
Sent: Friday, September 19, 2014 11:57 AM
To: sacgp
Subject: Public comment - Do not reduce our Quimby Park fee acreage.

I 125-1

Thank you!

Sincerely,
Proud Natomas Resident

**Letter
I25
Response**

**CJ Jones
9-19-14**

- I25-1 The comment raises issues with the proposed change to park service level standard. As described in Master Response 4.1.1, “Parks Service Level Master Response,” changes to the parkland service level standard are no longer proposed. Please refer to Master Response 4.1.1.

Letter
126

Remi Mendoza

From: Paul Noreen <paulnoreen@yahoo.com>
Sent: Friday, September 19, 2014 11:46 AM
To: sacgp
Subject: "Public comment - Do not reduce our Quimby Park fee acreage."

I 126-1

Sincerely,
Paul Noreen

**Letter
I26
Response****Paul Noreen
9-19-14**

- I26-1 The comment raises issues with the proposed change to park service level standard. As described in Master Response 4.1.1, "Parks Service Level Master Response," changes to the parkland service level standard are no longer proposed. Please refer to Master Response 4.1.1.

**Letter
127**

Remi Mendoza

From: Rajan Sharma <srj28@yahoo.com>
Sent: Friday, September 19, 2014 2:50 PM
To: sacgp
Subject: Public comment - Do not reduce our Quimby Park fee acreage

Hi,

I live in Natomas Park and would like to make the Public comment to not reduce the Quimby Park fee acreage.

I 127-1

Thanks,

Rajan Sharma

**Letter
I27
Response**

**Rajan Sharma
9-19-14**

- I27-1 The comment raises issues with the proposed change to park service level standard. As described in Master Response 4.1.1, “Parks Service Level Master Response,” changes to the parkland service level standard are no longer proposed. Please refer to Master Response 4.1.1.

**Letter
128**

Remi Mendoza

From: Theocharides, Christina E <theoc@csus.edu>
Sent: Friday, September 19, 2014 11:23 AM
To: sacgp
Subject: "Public Comment - D not reduce our Quimby Pak fee acreage."

I
128-1

That would be wrong!!! Don't do it!!!

Owner of 186 North Bnd home in North Natomas

Christina E. Theocharides

Transfer Credit Evaluator
California State University, Sacramento
6000 J Street, Room 2000
Sacramento, CA 95819-6056
Office: (916)278-7787
Fax: (916)278-6453

theoc@csus.edu



**Letter
I28
Response****Christina Theocarides
9-19-14**

- I28-1 The comment raises issues with the proposed change to park service level standard. As described in Master Response 4.1.1, “Parks Service Level Master Response,” changes to the parkland service level standard are no longer proposed. Please refer to Master Response 4.1.1.

**Letter
I29**

Remi Mendoza

From: tilakmayur@gmail.com on behalf of Mayur Tilak <tilakm@hotmail.com>
Sent: Friday, September 19, 2014 3:59 PM
To: sacgp
Subject: Public comment - Do not reduce our Quimby Park fee acreage.

I I29-1

**Letter
I29
Response**

**Mayur Tilak
9-19-14**

- I29-1 The comment raises issues with the proposed change to park service level standard. As described in Master Response 4.1.1, “Parks Service Level Master Response,” changes to the parkland service level standard are no longer proposed. Please refer to Master Response 4.1.1.

**Letter
I30**

Remi Mendoza

From: Todd.J.Williams@wellsfargo.com
Sent: Friday, September 19, 2014 12:12 PM
To: sacgp
Subject: Public comment - Do not reduce our Quimby Park fee acreage

I I30-1

Todd Williams

Cons Ln Underwritr-Fha/Va

Wells Fargo Home Mortgage | 11000 WHITE ROCK RD | RANCHO CORDOVA, CA 95670
MAC A1761-021
Tel 916-631-5283

Todd.J.Williams@wellsfargo.com

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**Letter
I30
Response****Todd Williams
9-19-14**

- I30-1 The comment raises issues with the proposed change to park service level standard. As described in Master Response 4.1.1, “Parks Service Level Master Response,” changes to the parkland service level standard are no longer proposed. Please refer to Master Response 4.1.1.

**Letter
I31**

Remi Mendoza

From: Dan Melanie Young <danmelanieyoung@gmail.com>
Sent: Friday, September 19, 2014 11:48 AM
To: sacgp
Subject: Public Comment - Do not reduce our Quimby Park fee acreage

I I31-1

Thank you !

5475 Gracen Way
Dan & Melanie Young

**Letter
I31
Response**

**Dan and Melanie Young
9-19-14**

- I31-1 The comment raises issues with the proposed change to park service level standard. As described in Master Response 4.1.1, “Parks Service Level Master Response,” changes to the parkland service level standard are no longer proposed. Please refer to Master Response 4.1.1.

**Letter
132**

Remi Mendoza

From: rugneclan@aol.com
Sent: Saturday, September 20, 2014 7:25 AM
To: sacgp
Subject: Public Comment - Quimby Park Fee Acreage

Please do not reduce the Quimby Park fee acreage.

I 132-1

Thank you for your consideration.

Deborah Collet-Rugne
North Natomas Resident & Voter

Sent via DroidX2 on Verizon Wireless™

**Letter
I32
Response**

**Deborah Collet-Rugne
9-20-14**

- I32-1 The comment raises issues with the proposed change to park service level standard. As described in Master Response 4.1.1, “Parks Service Level Master Response,” changes to the parkland service level standard are no longer proposed. Please refer to Master Response 4.1.1.

**Letter
133**

Remi Mendoza

From: Susie Pierce <spierce@golygon.com>
Sent: Saturday, September 20, 2014 6:57 AM
To: sacgp
Subject: Public comment -Quimby Park

Please do not reduce the acreage of Quimby Park.

I 133-1

Susan "Susie" Pierce
REALTOR/Branch Manager
Lyon Real Estate
C. 916.519.7874 D. 916.574.8881
www.SusiePierce.com
DRE# 01302463
Sent from my iPad

**Letter
I33
Response**

**Susie Pierce
9-20-14**

- I33-1 The comment raises issues with the proposed change to park service level standard. As described in Master Response 4.1.1, “Parks Service Level Master Response,” changes to the parkland service level standard are no longer proposed. Please refer to Master Response 4.1.1.

**Letter
134**

Remi Mendoza

From: Ron <ronknightjr@gmail.com>
Sent: Saturday, September 20, 2014 7:17 PM
To: sacgp
Subject: Quimby fee

Please save are parks do not LOWER the quimby fee. I am a VOTER and so are my NEIGHBORS!!!

I 134-1

**Letter
I34
Response****Ron Knight Jr.
9-20-14**

- I34-1 The comment raises issues with the proposed change to park service level standard. As described in Master Response 4.1.1, “Parks Service Level Master Response,” changes to the parkland service level standard are no longer proposed. Please refer to Master Response 4.1.1.

**Letter
135**

Remi Mendoza

From: Peter Schofield <2dimsim@gmail.com>
Sent: Saturday, September 20, 2014 12:19 PM
To: sacgp
Subject: Public comment - Do not reduce our Quimby Park fee acreage

Public comment - Do not reduce our Quimby Park fee acreage

I 135-1

**Letter
I35
Response****Peter Schofield
9-20-14**

- I35-1 The comment raises issues with the proposed change to park service level standard. As described in Master Response 4.1.1, “Parks Service Level Master Response,” changes to the parkland service level standard are no longer proposed. Please refer to Master Response 4.1.1.

Letter
I36

Remi Mendoza

From: michael campa <michael_j_campa@hotmail.com>
Sent: Sunday, September 21, 2014 6:12 PM
To: sacgp
Subject: Quimby Park Fees

I am a resident and a family man that lives in North Natomas. Right now I am a concerned citizen as I understand you are planning to move forward with reducing the developer fees in Natomas as well in the central city area. I have only lived in Sacramento for a few years, having moved from Southern California and my wife and I decided to settle in Natomas for several reasons. The abundance of beautiful parks being one of them. I know the Sacramento is trying find ways to entice business to develop in our region but I do not think they need to much of a push. Reducing the fee requirements is going to take away from what makes Natomas and Sacramento Special. I am a firm believe in change but at the same time why ruin a good thing. Please, I ask for you to reconsider and keep the Quimby Park fees at their current rate.

I36-1

Sincerely,

Michael Campa

**Letter
I36
Response****Michael Campa
9-21-14**

- I36-1 The comment raises issues with the proposed change to park service level standard. As described in Master Response 4.1.1, “Parks Service Level Master Response,” changes to the parkland service level standard are no longer proposed. Please refer to Master Response 4.1.1.

Letter 137

Remi Mendoza

From: Jacqueline Arredondo Favrin <jacarrth@hotmail.com>
Sent: Sunday, September 21, 2014 9:39 PM
To: sacgp
Subject: "Public comment - Do not reduce our Quimby Park fee acreage."

I'm in favor of not reducing the acres destined for our parks. We are already full of low density building in this area and parks should remain the same. | 137-1

thank you

Jackie F.

**Letter
I37
Response**

**Jacqueline Favrin
9-21-14**

- I37-1 The comment raises issues with the proposed change to park service level standard. As described in Master Response 4.1.1, “Parks Service Level Master Response,” changes to the parkland service level standard are no longer proposed. Please refer to Master Response 4.1.1.

Letter
I38

Remi Mendoza

From: Antonio Barrales <barrales16@yahoo.com>
Sent: Monday, September 22, 2014 9:05 AM
To: sacgp
Subject: Natomas Quimby Park Fee

To whom it may concern -

I am a resident at Natomas Parks, please don not reduce the Quimby Park fee acreage.

Antonio Barrales

I 138-1

**Letter
I38
Response**

**Antonio Barrales
9-22-14**

- I38-1 The comment raises issues with the proposed change to park service level standard. As described in Master Response 4.1.1, “Parks Service Level Master Response,” changes to the parkland service level standard are no longer proposed. Please refer to Master Response 4.1.1.

Letter 139

September 24, 2014

Scott Johnson, Associate Planner
City of Sacramento, Community Development
Department, Environmental Planning Services
300 Richards Boulevard, Third Floor Sacramento,
CA 95811 SRJohnson@cityofsacramento.org
(916) 808-5842

To Mr. Johnson:

The City of Sacramento ("City") is currently in the process of updating its General Plan ("General Plan"). We are concerned about the proposal in the General Plan to change the acceptable levels of service ("LOS") on various City streets to LOS F.

For example, the General Plan proposes to change the acceptable LOS on H Street to LOS F when we believe the 2009 General Plan allowed the LOS, at times, to be A-E. We believe this change is contrary to many of the General Plan policies.

For example, Mobility Goal 4.3 states: "Neighborhood Traffic. Enhance the quality of life within existing neighborhoods through the use of neighborhood traffic management and traffic calming techniques, while recognizing the City's desire to provide a grid system that creates a high level of connectivity." In addition, Policy M 4.3.1 - Neighborhood Traffic Management states: "The City shall continue wherever possible to design streets and approve development applications in a manner as to reduce high traffic flows and parking problems within residential neighborhoods."

139-1

Eliminating the flexibility for residential streets, such as H Street, to be at LOS A-E and, instead, designating those streets at LOS F seems to conflict with the above goal and policy to enhance the quality of life within existing neighborhoods and to reduce traffic and parking problems in residential neighborhoods. Not only will a higher level of traffic be permanently acceptable for H Street, the increase in traffic could cause vehicles to cut through other neighboring residential streets to bypass congestion on H Street which in turn would increase traffic to those neighboring residential streets.

We ask that the City not designate H Street, and other similar residential streets, at LOS F to allow the City to continue to work with the residents to find solutions to alleviate residential street traffic.

Very truly yours,



Will Green

**Letter
I39
Response**

**Will Green
9-24-14**

- I39-1 The commenter indicates that the proposed change in traffic level of service (LOS) standards would be inconsistent with General Plan policies related to neighborhood traffic and traffic management. Master Response 4.1.2 addresses neighborhood and quality of life issues associated with the proposed change in traffic LOS standards. No further response is necessary.

Letter
140

September 24, 2014

Scott Johnson, Associate Planner
City of Sacramento
Community Development Department
Environmental Planning Services
300 Richards Boulevard, Third Floor
Sacramento, CA 95811
SRJohnson@cityofsacramento.org
916-808-5852

Re: Comments on 2035 General Plan Update MEIR

Dear Mr. Johnson

I am one of the many people and organizations who signed the letter submitted by Trees4Sacto and strongly support all the points made in that letter with regard to city protected trees and acres required for parks.

With this letter I wish to reiterate the importance of trees because of all the benefits they provide, including the fact that sequester carbon and are an important means for cities to address global warming. I am particularly alarmed by the ongoing loss of trees, especially large canopy trees, in the Central City and believe that this loss must be stopped and that additional trees must be planted to mitigate for the loss of those that are now gone. I am also alarmed by the plan to reduce required park space in the Central City (and throughout the City). The loss of park space seems to be a giveaway to developers, who will be allowed to pay lower park fees, at the expense of current and future residents. Parks provide space for the planting of additional trees and they are a significant recreational amenity for residents. If the City wants to be successful in its goal of getting more people to move to the Central City and other close-in neighborhoods, it must provide more, not less, park space to accommodate them. Five acres per 1,000 residents is reasonable and should be the goal in all Community Plan Areas including the Central City.

140-1

I also wish to comment on the proposed LOS F on commercial corridors throughout the City. Parts of the Central City already have this as a result of the 2030 General Plan that was approved in 2009. This is certainly preferable to widening streets. But there should be adequate mitigations LOS F and those mitigations should result in the creation of 'complete streets', e.g. streets that are walkable and bikeable as well as driveable. This means providing continuous bike lanes, not lanes that die and disappear from one block to the next. It also means canopy trees along the parkway strips to provide comfort for bikers and walkers during the hot summer months, to clean the dirty air that is the result of vehicles idling in backed-up traffic, and to muffle the sound of that traffic. It also means addressing the safety (and lack thereof) of pedestrian crossings. Currently some of the lights along business and mixed use corridors in the Central City (and probably along such corridors in other parts of the City) are timed in such a way that they do not provide adequate time for pedestrians to cross unless they are running. Another area of danger for pedestrians is drivers turning from a one way street onto another one way street. Drivers tend to go around corners very fast without considering that pedestrians might be crossing. Bulb-outs would help reduce around the corner speeds and provide some protection to pedestrians. The 2035 update needs to spell out how these and other mitigations will be accomplished.

140-2

In conclusion, the 2030 General Plan sets the goal of making Sacramento the most livable city in America, but it often seems to be the case that planners don't take time to consider what livability means (or ask residents what we think it means) and the result is policies that make the City less livable, walkable or bikeable. That is certainly the case with these proposed revisions.

I40-3

One last comment: it is my understanding that the outreach meetings that the City held to inform residents of the General Plan updates were poorly attended. That might be because the updates consisted of residents walking around and looking at various poster boards about what is being proposed rather than meetings where plans were formally presented and residents could hear each others questions and comments. It might also be because many residents, myself included aren't sure that the City pays any attention to what we think.

I40-4

Sincerely,

Karen Jacques
Central City Activist
Founder, Midtown Neighborhood Association
threegables@macnexus.org

**Letter
I40
Response****Karen Jacques
9-24-14**

- I40-1 The commenter raises the issue of ongoing tree loss in the Central City. However, the commenter provides no detail related to this concern. This portion of the comment does not raise issues related to the adequacy of the Draft MEIR. The commenter goes on to raise issues regarding the change in the park service level standard. As described in Master Response 4.1.1, “Parks Service Level Master Response,” changes to the parkland service level standard are no longer proposed. Please refer to Master Response 4.1.1.
- I40-2 The commenter indicates that the proposed change in traffic level of service (LOS) standards should include adequate pedestrian and bicycle facilities that should result in creation of complete streets. Master Response 4.1.2 addresses neighborhood and quality of life issues associated with the proposed change in traffic LOS standards.
- I40-3 The commenter raises issues with livability, including walkability and bikeability. Master Response 4.1.2 addresses neighborhood and quality of life issues associated with the proposed change in traffic LOS standards.
- I40-4 The commenter indicates that a more formal, hearing-style outreach meeting might be better attended and more useful than the informal, workshop-style meeting. City staff appreciates this comment and will consider this approach for future meetings. The comment does not raise issues related to the adequacy of the Draft MEIR. No further response is necessary.

Letter
I41

Remi Mendoza

From: Judy Mc <judys.place@live.com>
Sent: Wednesday, September 24, 2014 6:22 PM
To: sacgp
Subject: Sacramento General Plan

I am adamantly opposed to the City's General Plan. It seems to accept a status quo.

1. The decrease in the amount of park acreage / 1000 residents has detrimental affect on live-ability
 - property values will decrease as more people note lack of outdoor space they will not move here - general funds for park maintenance will thus decrease with property values.
 - businesses will be less likely to relocate here with poor park access as livability is affected
 - health will be affected as parks become too far to walk to and have less space to exercise, especially for children
 - greenhouse gases will rise with more pavement and less open green space
 - a decrease in park acreage also will affect Quimby and in lieu of fees needed to maintain and renovate
 - demands for scheduling ballparks for games will increase and be in short supply and cause the need for car travel

I41-1

On the maps in the General Plan for 2030 and 2035, McKinley Park is shown as part of Central City parks. Yet when reading the portion of the General Plan for East Sacramento, McKinley Park is listed as one of their parks not Central City's. Which is it? The Plan says Central City has 120.6 acres of park with possible 55 more but does not mention how many acres East Sacramento has, only 1.6 ac/1000. Why not write like for like to make comparisons easier?

I41-2

This plan has no foresight only accommodations to developers.

2. This plan only works at accommodating what currently exists and is not a plan but an accommodation to developers. It makes it easier for infill to occur to the detriment of healthy living. It offers no creative alternatives.

I41-3

3. The plan does nothing to make neighborhoods more livable, like decreasing traffic/trucks through neighborhoods and keeping them livable and not making them thoroughfares. Lowering the LOS on streets actually makes traffic flow through neighborhoods worse impacting neighborhood livability with frustrated drivers, increase vehicle traffic and lower safety for residents/children.

The Plan states "... the significant slowdown in development activity since 2006 will require a "dial down" of the housing, employment, and population projections to be consistent with SACOG's Metropolitan Transportation Plan and an extension of the planning horizon to 2035." Why is public transportation not improved to the airport? Is this more about businesses influencing City Plans? Parking is a premium at the airport and could be alleviated with better planning.

I41-4

Infill does not seem to be a needed thing with the above statement about housing, employment and population projections.

Then there is the issue of trees. With traffic increasing, trees are definitely important. They not only filter emissions but produce oxygen for us and cool the landscape. Given this plan is going for total pavement of cityscape with infill, green is certainly needed. Many very large trees have been removed with development and replaced with short stature trees. This does not replace the benefits of the larger trees removed for developer's needs. This issue needs closer scrutiny/over sight. Architects need to design around existing established large

I41-5

trees. Replacement trees takes decades to replace their positive effects on our environment. Urban Forest needs to guard our trees with better maintenance to protect from disease infestation when limbs break.

Generally, this plan works toward the detriment of residents and their health, and only accommodates what is happening and does not redirect/reconstruct the future with creative alternative. So why do a plan if you are going to accept the status quo?

I41-5
cont.

Judy Mc

"Kindness feels the same to all creatures. >^..^< "

Letter I41 Response	Judy Mc 9-24-14
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- | | |
|-------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| I41-1 | The comment raises issues with the proposed change to park service level standard. As described in Master Response 4.1.1, “Parks Service Level Master Response,” changes to the parkland service level standard are no longer proposed. Please refer to Master Response 4.1.1. |
| I41-2 | The commenter is correct. McKinley Park is located within the Central City Community Plan Area boundary, because it contains all parcels that adjoin Alhambra Boulevard. While McKinley Park adjoins Alhambra Boulevard, it is surrounded on three sides by land located within the East Sacramento Community Plan Area. McKinley Park is a community park with a service area of two- to three-miles, making it much more accessible to the East Sacramento neighborhoods than the Central City neighborhoods, due to the intervening freeway (Business 80) that limits access to the park from many Midtown neighborhoods. The General Plan, therefore, considers this to be a Central City Park for purposes of administration, but for practical, public-use purposes, it primarily serves East Sacramento. This response is provided for clarification of the General Plan maps and text. The comment does not raise issues with the Draft MEIR. No changes to the Draft MEIR text are needed, and no further response is necessary. |
| I41-3 | The comment generally criticizes the General Plan’s merit. The comment does not raise issues related to environmental impacts or issues with the adequacy of the Draft MEIR. No further response is necessary. |
| I41-4 | The commenter expresses concern related to neighborhood livability and neighborhood traffic related to the proposed change in traffic LOS standards. Master Response 4.1.2 addresses neighborhood and quality of life issues associated with the proposed change in traffic LOS standards. The commenter also recommends providing public transit to the airport. This comment is related to policy and does not raise issues associated with environmental impacts or issues related to the adequacy of the Draft MEIR. No further response is necessary. |
| I41-5 | This comment does not raise any specific issues with the General Plan or the Draft MEIR. The comment identifies the importance of maintaining and replacing trees. The General Plan includes policies that promote protecting and enhancing the city’s trees. The comment does not raise issues with the adequacy of the Draft MEIR. |

Letter 142

September 24, 2014

Scott Johnson, Associate Planner
City of Sacramento, Community Development
Department , Environmental Planning Services
300 Richards Boulevard, Third Floor Sacramento,
CA 95811 SRJohnson@cityofsacramento.org
(916) 808-5842

To Mr. Johnson:

The City of Sacramento (“City”) is currently in the process of updating its General Plan (“General Plan”). We are concerned about the proposal in the General Plan to change the acceptable levels of service (“LOS”) on various City streets to LOS F.

For example, the General Plan proposes to change the acceptable LOS on H Street to LOS F when we believe the 2009 General Plan allowed the LOS, at times, to be A-E. We believe this change is contrary to many of the General Plan policies.

For example, Mobility Goal 4.3 states: “Neighborhood Traffic. Enhance the quality of life within existing neighborhoods through the use of neighborhood traffic management and traffic calming techniques, while recognizing the City’s desire to provide a grid system that creates a high level of connectivity.” In addition, Policy M 4.3.1 - Neighborhood Traffic Management states: “The City shall continue wherever possible to design streets and approve development applications in a manner as to reduce high traffic flows and parking problems within residential neighborhoods.”

142-1

Eliminating the flexibility for residential streets, such as H Street, to be at LOS A-E and, instead, designating those streets at LOS F seems to conflict with the above goal and policy to enhance the quality of life within existing neighborhoods and to reduce traffic and parking problems in residential neighborhoods. Not only will a higher level of traffic be permanently acceptable for H Street, the increase in traffic could cause vehicles to cut through other neighboring residential streets to bypass congestion on H Street which in turn would increase traffic to those neighboring residential streets.

We ask that the City not designate H Street, and other similar residential streets, at LOS F to allow the City to continue to work with the residents to find solutions to alleviate residential street traffic.

Very truly yours,



Martin Palomar

September 24, 2014
Page 2

**Letter
I42
Response**

**Martin Palomar
9-24-14**

- I42-1 The commenter indicates that the proposed change in traffic level of service (LOS) standards would be inconsistent with General Plan policies related to neighborhood traffic and traffic management. Master Response 4.1.2 addresses neighborhood and quality of life issues associated with the proposed change in traffic LOS standards.

Letter
143

September 24, 2014

City of Sacramento
Mayor Kevin Johnson
City Council Members
c/o Scott Johnson
Community Development Department
300 Richards Blvd, Third Floor
Sacramento, CA 95811

Sent by email to: srjohnson@cityofsacramento.org

RE: General Plan Update-Quimby Land Dedication

Dear Honorable Mayor Johnson and City Council Members

I strongly oppose the general plan amendment to reduce the quimby land dedication, and I urge you to do the same. I support the comments and the action of the Sacramento Parks and Recreation Commission and they have articulated many of the reasons this is a bad amendment.

I43-1

I also challenge the Environmental document where it states there are no significant impacts. The impacts will be on neighboring parks in and outside of the city limits, particularly the American River Parkway. As smaller and fewer parks would be constructed under this amendment, more wear and tear will be placed on existing parks. Use scheduling will also be impacted especially with already over-burdened soccer facilities.

I43-2

I propose that the existing 5 acres per thousand quimby requirement be kept in place. In the downtown and infill areas of the city accept the fees in lieu of the land to deal with the limited land issue infill projects face making project costs balance and profitable. The quimby fees are greatly needed to restore and maintain the existing parks and open space. The fees can purchase more open space where it's available and help develop existing parks like Sutter's Landing. Reducing the acreage requirement reduces resources to the city – that is just wrong and backwards thinking. Our parks are in TERRIBLE condition and need every cent!! City staff can be more creative and efficient maintenance needs to be looked at. Jeopardizing the future of our parks, quality of life and environment is not acceptable.

I43-3

I urge you to remove this item from the general plan update. Thank you for your time and consideration.

Judy Robinson
Judy Robinson
364 Santa Ynez Way
Sacramento, CA 95816
Robinsonju364@gmail.com

**Letter
I43
Response****Judy Robinson
9-24-14**

- I43-1 The comment raises issues with the proposed change to park service level standard. As described in Master Response 4.1.1, “Parks Service Level Master Response,” changes to the parkland service level standard are no longer proposed. Please refer to Master Response 4.1.1.
- I43-2 The comment raises issues with the proposed change to park service level standard and the conclusions of the Draft MEIR. As described in Master Response 4.1.1, “Parks Service Level Master Response,” changes to the parkland service level standard are no longer proposed. Please refer to Master Response 4.1.1. Also, Chapter 5 of this Final MEIR includes revisions to Draft MEIR Section 4.9, “Parks and Recreation,” resulting from the retention of the 2030 General Plan parkland service level standard. As identified in Master Response 4.1.1 and as can be seen in revised Draft MEIR Section 4.9, the modification to retain the 2030 General Plan parkland service level standard does not result in substantial changes to the analysis or conclusions of the Draft MEIR.
- I43-3 The comment raises issues with the proposed change to park service level standard and recommends keeping the current standard. As described in Master Response 4.1.1, “Parks Service Level Master Response,” changes to the parkland service level standard are no longer proposed. Please refer to Master Response 4.1.1.

Letter 144

September 24, 2014

Scott Johnson, Associate Planner
City of Sacramento, Community Development
Department, Environmental Planning Services
300 Richards Boulevard, Third Floor Sacramento,
CA 95811 SRJohnson@cityofsacramento.org
(916) 808-5842

To Mr. Johnson:

The City of Sacramento ("City") is currently in the process of updating its General Plan ("General Plan"). We are concerned about the proposal in the General Plan to change the acceptable levels of service ("LOS") on various City streets to LOS F.

For example, the General Plan proposes to change the acceptable LOS on H Street to LOS F when we believe the 2009 General Plan allowed the LOS, at times, to be A-E. We believe this change is contrary to many of the General Plan policies.

For example, Mobility Goal 4.3 states: "Neighborhood Traffic. Enhance the quality of life within existing neighborhoods through the use of neighborhood traffic management and traffic calming techniques, while recognizing the City's desire to provide a grid system that creates a high level of connectivity." In addition, Policy M 4.3.1 - Neighborhood Traffic Management states: "The City shall continue wherever possible to design streets and approve development applications in a manner as to reduce high traffic flows and parking problems within residential neighborhoods."

I44-1

Eliminating the flexibility for residential streets, such as H Street, to be at LOS A-E and, instead, designating those streets at LOS F seems to conflict with the above goal and policy to enhance the quality of life within existing neighborhoods and to reduce traffic and parking problems in residential neighborhoods. Not only will a higher level of traffic be permanently acceptable for H Street, the increase in traffic could cause vehicles to cut through other neighboring residential streets to bypass congestion on H Street which in turn would increase traffic to those neighboring residential streets.

We ask that the City not designate H Street, and other similar residential streets, at LOS F to allow the City to continue to work with the residents to find solutions to alleviate residential street traffic.

Very truly yours,


Ralph Sessa

**Letter
I44
Response****Ralph Sessa
9-24-14**

- I44-1 The commenter indicates that the proposed change in traffic level of service (LOS) standards would be inconsistent with General Plan policies related to neighborhood traffic and traffic management. Master Response 4.1.2 addresses neighborhood and quality of life issues associated with the proposed change in traffic LOS standards.

Letter 145

September 24, 2014

Scott Johnson, Associate Planner
City of Sacramento, Community Development
Department , Environmental Planning Services
300 Richards Boulevard, Third Floor ,
Sacramento, CA 95811

To Mr. Johnson:

The City of Sacramento ("City") is currently in the process of updating its General Plan ("General Plan"). We are concerned about the proposal in the General Plan to change the acceptable levels of service ("LOS") on various City streets to LOS F.

For example, the General Plan proposes to change the acceptable LOS on H Street to LOS F when we believe the 2009 General Plan allowed the LOS, at times, to be A-E. We believe this change is contrary to many of the General Plan policies.

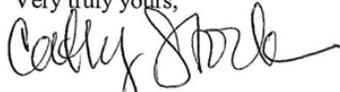
For example, Mobility Goal 4.3 states: "Neighborhood Traffic. Enhance the quality of life within existing neighborhoods through the use of neighborhood traffic management and traffic calming techniques, while recognizing the City's desire to provide a grid system that creates a high level of connectivity." In addition, Policy M 4.3.1 - Neighborhood Traffic Management states: "The City shall continue wherever possible to design streets and approve development applications in a manner as to reduce high traffic flows and parking problems within residential neighborhoods."

145-1

Eliminating the flexibility for residential streets, such as H Street, to be at LOS A-E and, instead, designating those streets at LOS F seems to conflict with the above goal and policy to enhance the quality of life within existing neighborhoods and to reduce traffic and parking problems in residential neighborhoods. Not only will a higher level of traffic be permanently acceptable for H Street, the increase in traffic could cause vehicles to cut through other neighboring residential streets to bypass congestion on H Street which in turn would increase traffic to those neighboring residential streets.

We ask that the City not designate H Street, and other similar residential streets, at LOS F to allow the City to continue to work with the residents to find solutions to alleviate residential street traffic.

Very truly yours,



Cathy Stock

**Letter
I45
Response****Cathy Stock
9-24-14**

- I45-1 The commenter indicates that the proposed change in traffic level of service (LOS) standards would be inconsistent with General Plan policies related to neighborhood traffic and traffic management. Master Response 4.1.2 addresses neighborhood and quality of life issues associated with the proposed change in traffic LOS standards. No further response is required.

Letter
146

Remi Mendoza

From: fatima malik <ftm.malik@gmail.com>
Sent: Thursday, September 25, 2014 7:55 PM
To: sacgp
Cc: Daniel Savala; Allen Warren
Subject: Public Comment or Question re GP Update

Protect the Public's Health and Please Maintain the current Park Acreage Service Level of 5 acres/1,000 in the City

Residents of Del Paso Heights and the community at large (including the Hagginwood Community Association and the Del Paso Heights Gardeners Group) do not support a reduction in the parks acreage service level. The city has a responsibility to protect the public's health and well-being. Therefore the city is strongly encouraged to take pride in our parks and making a commitment to maintaining the current service level. Reducing the parks acreage service level will not provide sufficient parkland distribution for a growing metropolitan city such as Sacramento.

Existing communities, such as Del Paso Heights in North Sacramento, already suffer from insufficient parkland acreage and some neighborhoods are in dire need of a safe park. This decision would put the community of Del Paso Heights at greater risk of insufficient or inadequate parkland distribution.

The benefits provided by parks to Sacramento residents are priceless. There is insufficient data analysis on the cost versus benefit ratio of maintaining the current park acreage service level. The impact of reducing the park acreage service level could have a greater and more negative impact on disadvantaged and under-served communities; especially diverse communities of color.

The multitude of the psycho-social benefits provided by parks correlates to park accessibility and other factors. There are existing communities in Sacramento that are experiencing insufficient parkland distribution and this would be a detriment to the quality of life and public health efforts as the city's population increases. The population of Sacramento deserves the current service level to be maintained not reduced.

In the urban built environment, parks serve an integral role in boosting community health and well-being by providing access to space where physical activity opportunities have the potential to manifest themselves. Increased physical activity levels are known to reduce the risk of chronic illnesses and can help people maintain and achieve a healthy weight. Parks play a critical role in community health and increasing evidence suggests that the built environment is a significant determinant of population level physical activity and overweight patterns (Gordon-Larsen, et. al., 2006). Parks play an important role in the prevention of chronic diseases and promotion of public health. Studies have found that children with more access to parks and recreational facilities are more active than children with less access. According to the National Recreation and Parks Association, the national guideline on sufficient distribution of parkland ranges from 6 to 19 acres per 1,000 residents.

The city should address the issue of maintenance for existing parks by identifying innovative solutions not by reducing the standards by which it operates. The city is encouraged to make the service level and maintenance of existing parks a high priority when allocating future budgets.

Just like the urban agriculture provision is suggested to do so, maintaining the current level would improve public health and the quality of life for Sacramento residents. Similarly, the service level can serve a vital role

146-1

in addressing and supporting provisions in the Climate Action Plan; by helping to reduce the effects of greenhouse gases.

I 146-1
cont.

--
Fatima Malik, Resident of North Sacramento, District 2

**Letter
I46
Response**

**Fatima Malik
9-25-14**

- I46-1 The comment raises issues with the proposed change to park service level standard. As described in Master Response 4.1.1, “Parks Service Level Master Response,” changes to the parkland service level standard are no longer proposed. Please refer to Master Response 4.1.1.

September 25, 2014

<p>Letter 147</p>

James P. Pachl
 Judith L. Lamare
 500 N Street, #1403
 Sacramento, CA 95814
 (916) 444-0910
jpachl@sbcglobal.net
judelam@sbcglobal.net

Scott Johnson, Associate Planner
 City of Sacramento, Community Development Department
 Environmental Planning Services
 300 Richards Boulevard, Third Floor
 Sacramento, CA 95811
 Submitted via email: SRJohnson@cityofsacramento.org

Comments on the Draft Master EIR of the proposed 2035 General Plan Update

Dear Mr. Johnson,

The following are our comments on certain elements of the Master DEIR (DMEIR) for the 2035 General Plan Update. Please provide us with notice of hearings and the availability of the FEIR and other documents regarding the 2015 General Plan Update.

1. Biological Impacts

a. Swainson's Hawk

The DMEIR, Table 4.3-1, "Special Status Species Potentially Occurring in the Policy Area" states that the Swainson's Hawk "nests in riparian trees," thereby implying that the Swainson's Hawk does not nest in trees that are not next to a watercourse. This is incorrect.

Swainson's Hawks prefer to nest in large tall trees, although they have been found nesting in smaller trees where no large trees are available. While the majority of Swainson's Hawk nests have been found along watercourses, there are also Swainson's Hawks nesting in large tall trees in open fields, alongside rural roads, and in urban areas (including the City) that are in close proximity to open fields. Maps of Swainson's Hawk nests show numerous active nest trees which are not located next to watercourses, and we have seen many which are not next to watercourses. Biologists have correctly suggested that concentration of nesting in some riparian areas occurs because the great majority of

147-1

large tall trees remaining in undeveloped areas of the Valley are alongside watercourses, due to the clearing of most of the Valley floor for agriculture and development.

A correct statement for the DMEIR would be that the Swainson’s Hawk nests in trees in riparian areas, in trees in open countryside, and trees in urban areas, including the City of Sacramento. We have specifically seen Swainson’s Hawks nesting in trees within the City, including developed neighborhoods within the City. For example, Swainson’s Hawks have been found nesting in trees in a neighborhood next to the McKinley Village project, the Bing Mahony Golf Course, neighborhoods in South Natomas and midtown, the site of the Delta Shores project, and in the parking lot next to the Department of Consumer Affairs building on North Market St in Natomas (old former Arena building).

147-1
cont.

b. Violation of CEQA by establishing incorrect thresholds of significance for impacts on biological resources

The DMEIR, pp 4.3-10, -11, states that impacts on biological resources are considered significant if the proposed General Plan would result in substantial degradation of the quality of the environment or reduction of habitat or population below self-sustaining levels of threatened or endangered species of plant or animal; affect other species of special concern or habitats (including regulated waters and wetlands) protected by agencies or natural resource organizations; result in loss or modification of riparian habitat, resulting in substantial adverse effects; have an adverse effect on state or federally protected wetlands and/or waters of the U.S. through direct removal, filling, or hydrological interruption; or result in loss of CDFW-defined sensitive natural communities such as elderberry savanna, northern claypan vernal pool and northern hardpan vernal pool.

147-2

This is inconsistent with CEQA Guideline §15065 (a)(1), which establishes mandatory findings of significance that are considerably broader than the threshold of significance proposed by the DMEIR. Specifically, CEQA Guideline §15065 (a)(1) requires that a lead agency find that a project **may** have a significant effect on the environment, and thereby require an EIR, when there is substantial evidence that any of the following conditions **may** occur (inconsistencies indicated by bold type underline):

“(1) The project has the **potential** to substantially degrade the quality of the environment; **substantially reduce the habitat of a fish or wildlife species**; cause a fish or wildlife population to drop below self-sustaining levels; **threaten to eliminate a plant or animal community**; **substantially reduce the number or restrict the range of an endangered, rare, or threatened species**, . . . “.

CEQA Appendix G, § IV (Biological Resources) sets forth additional type of effects that are potentially significant. These include:

(a) “Have a substantial adverse effect either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans policies, regulations, or by [CDFW] or [USFWS].”

(b) “Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by [CDFW] or [USFWS.]” (NOTE: “substantial adverse effect” is broader than City’s narrower “loss or modification of riparian habitat.”)

(c) . . . (consistent with City’s threshold criteria.)

(d) “Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.”

I47-2
cont.

By adopting thresholds of significance that are substantially narrower than what CEQA defines as “significant impacts”, City would in effect be inviting project Applicants (and City staff) to make determinations of “less than significant” which would be in violation of CEQA, thereby inviting CEQA litigation. For the City to adopt “thresholds of significance” which are less protective than those of CEQA may itself be a violation of CEQA. The prudent course for the authors of City’s 2035 GP update would be to incorporate CEQA’s standards for potentially significant effects into the City’s thresholds of significance (by reference or word-for-word), as well as such additional standards that may be or have been developed by the City.

2. The population projections relied upon by the General Plan and the DMEIR are speculative and not supported by substantial evidence.

The proposed 2035 General Plan and DMEIR relies upon the assumption that the City’s population will grow by 165,000 additional residents, from 475,000 in 2012 to 640,000 residents by 2035, and that jobs in the City would grow by 86,483 employees, from 299,732 to 386,215 total jobs in the City, between 2012 and 2035. This analysis relies entirely on SACOG’s 2035 MTP/SCS, which relies on Preferred Blueprint Scenario. These very speculative projections are driving the General Planning Update process.

I47-3

Obviously, the projected population growth is dependent upon the actual job growth. So far, we have not seen signs of current or pending significant job growth occurring in or near the City, with the exception of the growth of the food industry in Yolo County. Government employment, which is one of the mainstays of Sacramento’s economy, is growing slowly if at all. The construction industry, another mainstay, crashed in the Great Recession and can recover only to the extent that there may be demand for new construction, which is largely dependent upon new decent-paying jobs. There does not appear to be resumption of a significant migration of Silicon Valley employers to

Sacramento. Substantially worsened traffic congestion from Sacramento to the Bay Area (2 hr one-way during rush hours) makes home-buying in Sacramento less than attractive to persons employed in the Bay Area.

I47-3
cont.

The GP and DMEIR correctly note a movement to multi-family housing in the City, which we fully support. However families with children in Sacramento rarely choose to live in multi-family housing, particularly in the Central City area, if they can afford to rent or buy a single-family home. Often, people who can afford to pay the higher rents or condo prices of the Central City can also afford to purchase or rent a single family home in the City’s less dense areas or the suburban areas where housing costs are substantially less and there is substantially more green space and less traffic.

It is critical for the City’s planners to understand that if City wants to attract people to live in multi-family housing, particularly in the Central City area, the dense multi-family neighborhoods must be a pleasant place to live, and that housing should be readily affordable to middle and lower income residents. Retention of the tree canopy and additional parks and park facilities adequate to accommodate additional population is critical to making higher-density living attractive in Sacramento.

I47-4

Unlike San Francisco, LA, and other “big cities”, there is plentiful housing affordable to middle-income persons in the less-dense single family neighborhoods a few miles from downtown.

3. The substantial reduction in the number of trees due to implementation of the 2035 General Plan will not be mitigated to less than significant. (Impact 4.3-10)

Policy ER 3.1.3 of the proposed GP , p. 2-191, “Trees of significance”, says that City shall “require the retention of City Trees Heritage Trees . . . “ Does “City Trees Heritage Trees” mean “City Trees” and “Heritage Trees” (including private Heritage Trees), or does it refer only to those City Trees which also are Heritage Trees (100” circumference, or 36” circumference for certain native tree species.) This ambiguity needs to be clarified.

I47-5

The DMEIR, p. 4.3-19, incorrectly says that “it is the City’s policy to retain trees, whenever possible, regardless of their size.” In fact review of the GP’s proposed Urban Forest policy and current Tree Ordinances shows that it protects only City-owned trees, and privately-owned Heritage Trees.

The great majority of trees and tree canopy in the City are privately owned and less than Heritage circumference. There is **no** protection for privately-owned trees which are less than Heritage Tree circumference, and **no requirement for mitigation** of loss of less-than-heritage size trees which are privately owned. For that reason alone, the statement in the DMEIR, p. 4.3-19 through 4.3-20, that implementation of the 3025 GP “would not

I47-6

result in the substantial loss of trees within the Policy Area” is not supported by evidence, and is factually untrue.

Maintaining the tree canopy is critical to making the City, particularly the Central City and nearby areas, an attractive place to live for those who choose to live in multi-family housing having little or no green space. The ongoing reduction of the tree canopy, and the failure of the proposed GP to provide any protection for trees that are not City trees or heritage-size private trees, or to require mitigation for removal of these trees by development projects under this GP, may well have the opposite effect.

I47-6
cont.

Thank you for the opportunity to comment.

Respectfully submitted,

Judith L. Lamare

James P. Pachl

**Letter
I47
Response**

**Jim Pahl and Jude Lamare
9-25-14**

I47-1 The commenter suggests that the statement in Table 4.3-1 indicating that Swainson’s hawk “nests in riparian trees” is incorrect and that the statement implies that Swainson’s hawk only nest in trees near watercourses. The habitats listed in Table 4.3-1 are not intended to be exclusive and the statement is not intended to imply that Swainson’s hawk nesting is limited to riparian trees. However, to increase clarity, the phrase in Table 4.3-1 (p. 4.3-4) describing Swainson’s hawk habitat is revised as follows:

Nests primarily in riparian large trees and forages in open fields (annual grasslands, fallow fields, dry and irrigated pasture). Most nesting recorded along the Sacramento River.

Impacts 4.3-3 and 4.3-11 in the Draft MEIR address impacts to Swainson’s hawk resulting from implementation of the proposed 2035 General Plan. Several policies are identified that would reduce potential impacts. Except for policies associated specifically with Fisherman’s Lake, these policies are not limited to riparian areas and would apply regardless of whether nesting trees are located within or outside riparian areas. Therefore, the minor clarification to the Draft EIR text does not alter the analysis or conclusions of the Draft MEIR.

I47-2 The commenter suggests that the thresholds of significance for impacts to biological resources are incorrect and, therefore, violate CEQA. This suggestion is based on the commenter’s interpretation of specific wording in the CEQA Guidelines related to mandatory findings and specific wording in Appendix G of the CEQA Guidelines. The commenter bases the contention on the premise that the Draft MEIR’s stated thresholds are “narrower” than CEQA’s mandatory findings (i.e., allow a greater magnitude of effect without identifying it as significant) and that narrower thresholds invite “applicants and City staff to make determinations of ‘less than significant’.”

Whereas the commenter describes the City’s thresholds of significance as “narrower” than CEQA’s definition (and, therefore, less protective), it would be more accurate to describe them as more specific and more protective. CEQA Section 15065 broadly defines significance related to biological resources impacts—if a project would:

- ▲ substantially degrade the quality of the environment;
- ▲ substantially reduce the habitat of a fish or wildlife species;
- ▲ cause a fish or wildlife population to drop below self-sustaining levels;
- ▲ threaten to eliminate a plant or animal community;
- ▲ substantially reduce the number or restrict the range of an endangered, rare, or threatened species.

The Draft MEIR’s thresholds of significance encapsulate the “mandatory findings of significance” identified above, but provide more specific direction to City staff and decision makers who must apply these thresholds of significance to the proposed General Plan, and, if the Draft MEIR is certified and the proposed 2035 General Plan adopted, to future projects. The Draft MEIR’s thresholds of significance are provided below.

For the purposes of this MEIR, impacts on biological resources are considered significant if the proposed General Plan would:

- ▲ result in substantial degradation of the quality of the environment or reduction of habitat or population below self-sustaining levels of threatened or endangered species of plant or animal;
- ▲ affect other species of special concern or habitats (including regulatory waters and wetlands) protected by agencies or natural resource organizations;
- ▲ result in the loss or modification of riparian habitat, resulting in a substantial adverse effect;
- ▲ have an adverse effect on state or federally protected wetlands and/or waters of the United States through direct removal, filling, or hydrological interruption; or
- ▲ result in the loss of CDFW-defined sensitive natural communities such as elderberry savanna, northern claypan vernal pool, and northern hardpan vernal pool.

The Draft MEIR thresholds of significance focus on the specific habitats and biological resources present within the City and provide specificity beyond the conditions identified in CEQA Guidelines Section 15065 and stated above. The City's thresholds for biological resources avoid highly interpretable phrases such as "threaten to eliminate" or "substantially reduce." Instead, the City's thresholds of significance use more certain phrases, such as "result in the loss or modification of" or "have an adverse effect...through direct removal, filling, or hydrological interruption." Because of the City's thresholds of significance encapsulate the mandatory findings, but add specificity and reduce ambiguity, the City's thresholds are more protective.

The commenter also suggests that the Draft MEIR should use the environmental checklist questions identified in CEQA Appendix G. The first page of Appendix G states "[t]he following is a sample form and may be tailored to satisfy individual agencies' needs and project circumstances.... The sample questions in this form are intended to encourage thoughtful assessment of impacts, and do not necessarily represent thresholds of significance." It is clear from the Draft MEIR's stated thresholds of significance that they consider and incorporate many of the concepts identified in Appendix G. However, as encouraged on the first page of Appendix G, the City has thoughtfully considered the potential impacts and has identified the appropriate thresholds of significance.

The comment does not result in any change to the Draft MEIR's thresholds of significance and no further response is necessary.

- 147-3 The commenter criticizes the General Plan's use of SACOG's MTP/SCS projections for population and employment, calling them "very speculative." Any projection of growth over a 20-year period involves some degree of assumption; however, the SACOG model is based on extensive research by expert regional and transportation planners. There is arguably no better model to project growth in the Sacramento region. The commenter offers no better method for making population and employment projections. The commenter also does not raise any specific issues with the adequacy of the Draft MEIR. No further response is necessary.
- 147-4 The commenter discusses a movement of higher income families away from multi-family housing in the Central City to single-family housing in less dense areas. The commenter identifies the need to retain tree canopy and parks facilities to attract the population to higher-density living. This comment does not raise issues with the adequacy of the Draft EIR. No further response is necessary.

- I47-5 The commenter correctly identifies a typographical error in General Plan Policy ER 3.1.3 which also occurs in the Draft MEIR. The text on page 4.3-9 of the Draft MEIR is revised as follows:
- ▲ **Policy ER 3.1.3:** Trees of Significance. The City shall require the retention of City trees and Heritage Trees by promoting stewardship of such trees and ensuring that the design of development projects provides for the retention of these trees wherever possible. Where tree removal cannot be avoided, the City shall require tree replacement or appropriate remediation. (RDR/MPSP)

This text revision corrects a typographical error and constitutes a minor clarification to the Draft MEIR text. The text revision does not result in any changes to the analysis or conclusion of the Draft MEIR. This correction will also be made to the corresponding text in the 2035 General Plan.

- I47-6 The commenter indicates that there is “no protection” for privately-owned trees that are too small to be considered Heritage Trees and no mitigation for these trees. Based on this premise, the commenter suggests that the Draft MEIR’s conclusion regarding substantial loss of trees is “factually untrue.” Several proposed General Plan policies, including ER 3.1.6 and 3.1.7, promote tree planting to increase the City’s tree canopy, which increases shade thereby reducing urban heat island effect and energy consumption. Other proposed policies, such as ER 3.1.8 and 3.1.9, focus on public education regarding the importance of trees and on providing adequate funding to maintain the city’s urban forest.

See also the discussion of Impact 4.3-3 (Draft MEIR, page 4.3-13) relating to impacts to nesting and foraging habitat. As indicated in that discussion: “...the General Plan includes policies and goals designed to protect biological resources and natural habitats...” Consistent with general plan policy, the City evaluates any loss of trees in terms of potential significant impacts to nesting and foraging habitats, or other significant impacts that could occur.

Because the 2035 General Plan requires the City to protect City and Heritage Trees by ordinance, retain all other trees whenever possible, promote tree planting to increase canopy cover and reduce energy use, promote education related to trees, and provide funding to care for the urban forest, the suggestion that there is “no protection” for privately owned trees is inaccurate and the suggestion that the implementation of the Draft MEIR would result in a substantial loss of trees is unfounded. The Draft MEIR’s conclusion is appropriate.

Letter
148

Scott Johnson

From: sacgp
Sent: Thursday, September 25, 2014 2:34 PM
To: Scott Johnson
Subject: FW: Public Comment: Sacramento 2035 General Plan Update

From: Michael Saeltzer [mailto:tosaeltz@yahoo.com]
Sent: Thursday, September 25, 2014 1:28 PM
To: sacgp
Subject: Public Comment: Sacramento 2035 General Plan Update

Dear Mr. Johnson

I am concerned with changes to park acreage service levels, policy shifts and changes to levels of service for the mitigation of traffic, and overall changes that threaten trees, and the Urban Forest in Sacramento.

Park Acreage Service Levels

Sacramento's current Park Acreage Service Level goal is 5 acres per 1,000 residents. The city currently only has 3.4 acres of neighborhood and community parks per 1,000 residents. As it stands now, we need to increase our park acreage to meet our goal as our population grows.

However, the Sacramento 2035 General Plan Update proposes a significant reduction to the Park Acreage Service Level Goal from 5 acres per thousand residents to 3.5 acres outside the Central City and 1.75 per thousand residents within the Central City.

In providing the rationale for further decreasing the amount of park space available to our public the City states "Parkland acquisition, particularly in developed urban areas, is often not feasible. Development sites are either too small to dedicate parkland, other vacant land is in short supply, or development costs (including in-lieu fees) make projects infeasible."

I respectfully request that the City provide the public the evidence to back up the claims that acquisition and development, and associated costs/fees, are "often not feasible", and "make projects infeasible".

Without such critical information, how is the public to know if indeed the term "infeasible" is accurate?

I certainly appreciate and look forward to continued engagement regarding planning our future park space. I do though need more information regarding this important issue.

Therefore, I respectfully oppose the proposed reductions in Park Acreage Levels of Service and reductions in revenue streams (i.e. Quimby in lieu of fees) to provide for their upkeep - at least until more specific evidence is provided to constitute the use of the term "infeasible". Parks are one of the most valuable assets of our City and the public deserves to see the facts that bear out the claims the City, and or developers, provide.

In general I oppose changes to our park system which will increase the wear and tear on existing parks while reducing revenue streams that are essential to ensure their long term health and vibrancy. I believe the proposed changes indicate that the quality of our parks will be degraded, and thus in the long run will degrade the overall value and desirability of living in our City.

Traffic Level of Service

I48-1

Traffic Level of Service: The current traffic LOS standard typically requires mitigation that results in increases in road size inconsistent with urban land uses. The 2035 General Plan includes a policy shift that would maximize the efficiency of the roadway network for all transportation modes while minimizing potential negative impacts. These objectives would be balanced by maintaining citywide traffic expectations at LOS D while identifying areas and streets where other community values are more important than maximizing traffic flow. These new areas include Priority Investment Areas, where transit use, walking and biking are prioritized and where there is not sufficient space to widen roadways. Additionally, streets projected to have LOS E or F by 2035 will not be required to operate at LOS D.

While it is sensible that the Sacramento 2035 General Plan Update address a metric that has had unintended and negative impacts on sustainable development for decades, it is also important that other aspects of traffic impacts not be ignored or whitewashed in this process. Typically neighborhood concerns with regard to new traffic being introduced to residential areas from development proposals or roadway modifications do not center solely on inconvenience to motorists at controlled intersections. As you know this is essentially what LOS measures.

148-2

Many neighborhood residential occupants are more concerned with the introduction of additional cars on streets that have typically seen low to moderate volumes of traffic and what that means for their quality of life, particularly with regard to noise, safety and new sources of air pollution.

This change to the General Plan does not at all address those concerns which may result in parents feeling that their children can no longer play in their front yards or that any health issues that their family is experiencing will likely be exacerbated by additional vehicular emissions. The proposed update still focuses on roadway users, be they vehicles, bicycles or pedestrians on sidewalks, and not on the traffic impacts, particularly of pollution, on the residents that front those roadways.

Furthermore, many existing low volume streets will still be well within the LOS D expectation even if their traffic volumes are doubled or tripled. This was the case for many of the Midtown and East Sacramento residential streets soon to be impacted by the new traffic from the McKinley Village project. Many homeowners had purchased their properties in the expectation that it would always be a relatively quiet street, safe for their children to play near, but major projects can completely change that character. EIR analyses of LOS completely ignore this more micro-level environmental impact.

148-3

The primary driver of the need to measure traffic impacts is to reduce local and regional air pollution. As the City looks the other way while some streets degrade to LOS E or F levels that might encourage a few drivers to start using bicycles or our less-than-robust transit system, the real world result will be an increase in air pollution for those properties that front the now traffic-clogged streets full of idling vehicles. The impression given is that this update is more about reducing possible roadblocks to development than it is about actually reducing pollution.

148-4

Finally, as I am sure you are well aware; the State is currently reforming its reliance on LOS in environmental studies through SB 743. They appear to be settling on a Vehicle Miles Traveled (VMT) metric as a better method for evaluating traffic impacts from new projects. Would it make more sense for this update to anticipate that change and try to incorporate VMT as a better way to measure traffic impacts to both road users and property owners? If someone lives mid-block on a residential street with controlled intersections on both ends, that person's awareness of the environmental impact of new traffic is better represented by the number of VMT in front of their house than they would be by the LOS at distant stop signs or traffic lights.

148-5

I urge a more holistic approach to the environmental impacts of increased traffic due to additional development. This approach should not only measure impacts to roadway users but should also acknowledge burdens placed upon the people that reside on those roadways.

148-6

Sacramento Urban Forest

Sacramento is know world wide as the "city of trees". Our tree lined streets, beautiful parks, and open natural spaces, are perhaps the most attractive parts of Sacramento. Many people chose to live in Sacramento precisely because of its natural beauty. Because of this, and many other benefits such as health, and overall quality of life, I believe that our trees and natural settings are worthy of particular attention when planning development.

148-7

I therefore request that the City provide more quantifiable data in regards to measuring the true value of our parks, trees, urban forest, and tree canopy. I would like to ensure that these special assets of our City not only be protected, but be allowed to grow and thrive throughout our neighborhoods, and that the amount of land we dedicate to nature increase as our population grows.

148-7
cont.

We are lucky. Youth throughout our neighborhoods are being taught in school how to be good leaders, and careful stewards of our environment, our food, plants, trees and animals. Witness the "Science Alive" program at Theodore Judah Elementary School and the boost in science scores the students there are achieving through "hands on learning".

Also witness our youth entering colleges in our community and across the nation with an increased desire to act locally and think globally when addressing the value of our forests, environment, and nature. Now, more than ever, the world is recognizing the importance of preserving and caring for our environment, including of course trees, climate, and the air we all must breath.

Emerging alongside these trends are new and more accurate methods of economic accounting which greatly improve our ability to make well thought out long term decisions in regards to preserving the true value of our natural habitats. For example, see Trust for Public Land, "Measuring the Economic Value of a City Park System," 2009, or "Northern California Coast Community Tree Guide Benefits, Costs, and Strategic Planning," April 2010, E Gregory McPherson, James R. Simpson, Paula J. Peper, Aaron M.N. Crowell and Quingfu Xias.

148-8

I feel that new research and economic models need to be included in any long term cost- benefit analysis because they are more accurate, and provide the public with more meaningful information to measure the impacts of development and growth on our most valuable, and perhaps least protected, assets - namely our environment, air, natural resources, trees and parklands. These all relate directly to the health and quality of life of our community now and into the future. They need to be properly accounted for in terms of their economic value and we share the concerns expressed by many other communities in the "Joint Letter from Community Groups and Individuals"

Respectfully,

Michael Saeltzer
East Sacramento Resident since 1998

Letter I48 Response	Michael Saeltzer 9-25-14
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- I48-1 The comment raises issues with the proposed change to park service level standard. As described in Master Response 4.1.1, “Parks Service Level Master Response,” changes to the parkland service level standard are no longer proposed. Please refer to Master Response 4.1.1.
- I48-2 The commenter notes that the General Plan Update includes modifications to the City’s LOS standards, and goes on to state that the modifications to the LOS standards do not address concerns related to additional traffic on residential streets. The commenter correctly summarizes the modified LOS standards contained in Policy M 1.2.2. Master Response 4.1.2, “Neighborhood Livability Maser Response,” includes a detailed discussion regarding neighborhood traffic and livability issues. Please refer to Master Response 4.1.2.
- I48-3 The commenter states that a recently approved project in the City, McKinley Village, will result in changes to the character of residential streets and will result in traffic impacts that are ignored by analyses contained in EIRs. Master Response 4.1.2 includes a detailed discussion regarding neighborhood traffic and livability issues. Please refer to Master Response 4.1.2.
- I48-4 The commenter states that increases in traffic will result in increases in air pollution, and that the General Plan update appears to be “more about reducing possible roadblocks to development than it is about actually reducing pollution.” Section 4.2 of the MEIR provides an evaluation of potential air quality impacts that would result from the implementation of the 2035 General Plan, and accounts for pollution that would be generated by increases in automobile traffic. This comment does not raise issues or concerns regarding the adequacy, accuracy, or completeness of the environmental document. No further response is necessary.
- I48-5 The commenter states that SB 743 will result in reduced reliance on LOS in determining transportation impacts, and increased reliance on VMT as a metric. Program 18 of the General Plan Update affirms the City’s desire to investigate appropriate transportation performance metrics and thresholds in line with SB 743:
- Program 18.** Based on the California Environmental Quality Act (CEQA) guidelines amendments adopted for the implementation of SB 743 (Steinberg, 2013) or other future state legislation, the City shall consider the applicability of using transportation performance metrics and thresholds for measuring transportation system impacts provided in the approved guidelines amendments, as well as for making General Plan consistency determinations and developing transportation financing programs. Based on this consideration, the City shall review, and update if needed, the General Plan LOS standards and policies and the Traffic Impact Analysis and Mitigation Guidelines to be consistent with the approved CEQA Guidelines amendments.
- Program 18 would require update, if needed, of the General Plan LOS standards and policies to be consistent with approved CEQA Guidelines amendments. This is an appropriate approach, because the SB 743 CEQA Guidelines amendments are in preliminary draft form at this time and the ultimately approved provisions cannot yet be known. No further response is necessary.
- I48-6 The commenter urges the City to adopt “a more holistic approach to the environmental impacts of increased traffic” that acknowledges impacts to residential roadways. Master Response 4.1.2 includes a detailed discussion regarding neighborhood traffic and livability issues. Please refer to Master Response 4.1.2. Also refer to response to comment I45-8 above. No further response is necessary.

- I48-7 The commenter requests more quantifiable data regarding the value of parks, trees, urban forest, and tree canopy. These types of economic considerations are not considered impacts to the environment and are not required for evaluation in the Draft MEIR. No further response is necessary.
- I48-8 The commenter describes the enviro-centric movement of education and youth in the country and expresses that there should be research and economic models to ascribe value to natural resources and convey to the public the potential effects to these resources in terms of economic value and cost-benefit. These types of economic considerations are not considered impacts to the environment and are not required for evaluation in the Draft MEIR. No further response is necessary.

Organizations

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Letter
01



September 4, 2014

Planning and Design Commission
City of Sacramento
300 Richards Boulevard, 3rd Floor
Sacramento, CA 95811

Subject: 2035 General Plan Update

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William Ishmael

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EXECUTIVE DIRECTOR
Raymond L.
Tretheway III

Dear Planning and Design Commission Board Members,

The Sacramento Tree Foundation applauds the City's investments and work to build an expansive and healthy urban forest. Today, the City is recognized nationally and international for its innovative, leading edge urban forest practices and policies. We are very pleased to see that the Climate Action Plan measures will be incorporated into the 2035 General Plan Update.

01-1

With the need for resiliency and adaptation measures and policies to address our changing climate, we strongly encourage the City to adopt the following pro-active urban forest measures:

The City of Sacramento needs to aggressively address Urban Heat Island effects through the expansion and protection of our urban forest canopy.

01-2

The 10 warmest years on record have occurred since 1998 (NOAA State of the Climate Global Analysis 2012). To address this trend, the City needs to redouble its efforts to aggressively mitigate and reduce the adverse impacts of Urban Heat Islands. These impacts include air quality issues, water and energy usage and public health issues. An aggressive expansion of our urban tree canopy will make direct contributions to the long-term livability of our city and the health of all city residents.

We support the City's Climate Action Plan recommendation to explore options to improve parking lot shade requirements and compliance issues; including to allow additional trees to be installed without requiring replacement of lost parking spaces.

As an effective climate action measure, we urge that the General Plan to go further and adopt tree canopy policies to strategically retrofit older parking lots to come into compliance with existing city ordinances.



191 Lathrop Way, Suite D
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sactrec.com

Growing healthy, livable communities in the Sacramento region by building the best regional urban forest in the nation.

100%
post consumer

Strategic retrofitting means managing the renovations in business-conscientious way – leveraging planned upgrades to parking lots – not unlike a homeowner needing to ensure code compliance when renovating a home. Using cost-effective remote sensing technology, the city could target the largest parking lot heat sinks and offer support or incentives to shade these asphalt deserts. An example of such a transformation is the successful retrofit at Florin Road Bingo, which was the project of the 2012 Leadership Sacramento Class.

01-2
cont.

Research shows that customers prefer shaded parking lots and will not only seek out those establishments, but stay to shop longer (K. Wolf, 1998). Moreover, shade trees extend the life of paved surface by 30% or more, decreasing parking lot maintenance costs for business owners.

The City of Sacramento needs to retain its per capita park acreage requirements.

At a time when the findings of numerous studies, including the Nature Conservancy’s recent study of the benefits of Sacramento’s parks, demonstrate the multiple benefits of urban green space as critical city infrastructure the City needs to adopt innovative park strategies.

From parklets to roof top recreational facilities to tree lined streets, bike lanes and walkways, City residents need places that are safe, comfortable and appealing for their physical health as much as mental and emotional well-being. We desire a City where greenspaces and trees are valued for the benefits they provide and are planned for as part of the city’s infrastructure. Green spaces and green canopy create a sense of calm and sense of place, making city life seem more sane and secure.

01-3

Infill development is important, but should not occur at the expense or elimination of the City’s richest, defining legacy: the greenspaces and tree canopy that defines the essence of our public realm. To suggest that park space requirements should be reduced because City goals have not been met is illogical and counter-intuitive, leading only to more heat-attracting hardscape, harsher and less attractive urban environment.

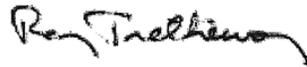
New studies are showing tht infill projects already pose air quality risks due to close proximity to streets and the exposure to high traffic particulate matter. Increased green space –“parklettes” and tree canopy buffering infill development from roadway pollution – is more consistent with healthy, sustainable urban design.

Again, the Tree Foundation commends the City for their strong commitment to building a sustainable and livable city and for their long history of appreciation for the role trees play in making many Sacramento neighborhoods park-like: beautiful and inviting for recreation and to re-create oneself.

01-3
cont.

Thank you very much for the opportunity to share our perspective and suggestions on the 2035 General Plan Update. If the City would like to further discuss our suggestions, we would be happy to meet with you.

Sincerely,



Ray Tretheway
Executive Director

Letter 01 Response	Sacramento Tree Foundation Ray Tretheway, Executive Director 9-4-14
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- 01-1 The comment compliments the City's efforts related to building the urban forest and incorporating the CAP measures into the proposed 2035 General Plan Update. The comment does not raise environmental issues or issues related to the adequacy of the Draft MEIR. No further response is necessary.
- 01-2 The comment identifies policy changes related to tree canopy. City staff is currently undertaking an update to the City's Tree Ordinance to address the issues raised in this comment. The City intends to begin a management plan study once the City's Tree Ordinance is in place. City staff believes that is the appropriate time to address these issues. City staff anticipates that the management plan will be fully aligned with the updated General Plan. There are no recommended policy changes at this time. The comment does not raise issues with the adequacy of the Draft MEIR. No further response is necessary.
- 01-3 The comment raises issues with the proposed change to park service level standard. As described in Master Response 4.1.1, "Parks Service Level Master Response," changes to the parkland service level standard are no longer proposed. Please refer to Master Response 4.1.1.



**SACRAMENTO AREA
BICYCLE ADVOCATES**

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sacbj
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**Letter
02**

September 10, 2014

Remi Mendoza, Associate Planner
City of Sacramento, Community Development Department
300 Richards Boulevard, Third Floor
Sacramento, CA 95811-0218
rmendoza@cityofsacramento.org

Subject: Draft 2035 General Plan Update

Dear Mr. Mendoza:

Thank you for the opportunity to comment on the draft General Plan Update (GPU). We will be submitting a separate comment letter on the draft Master Environmental Impact Report for the 2035 GPU.

In Sacramento's Climate Action Plan, now integrated with the General Plan, the City has committed to substantially increase the share of trips that are made by bicycle. The purpose of our comments here is to help the City achieve that goal. Sacramento's flat terrain and pleasant climate mean that many more people could use bicycles for everyday transportation if safe and comfortable bikeways were available.

Comments on Mobility Section M5 Bikeways. We greatly appreciate that some of the policies in this section have been substantially improved (e.g. Policy M 5.1.3 "Continuous Bikeway Network" and M 5.1.4 "Conformance to Applicable Standards"). We request that some of the other Bikeway policies also be improved.

Bike-Friendly Facilities. Under Policy M 5.1.3, the City shall provide a "continuous bikeway network of bike-friendly facilities." Street characteristics such as number of traffic lanes, traffic speeds and volumes, presence of on-street parking, presence of striped centerlines, and bike-lane widths all influence bicyclists' perceptions of street friendliness for bike riding. Stress caused by high speed and high volume vehicle traffic is the largest impediment to large numbers of people being willing to use bicycling for everyday transportation (Mekuria et al. 2012). Establishing a network of bike-friendly facilities will require identifying how to reduce stressful bicycling conditions on many of Sacramento's streets.

02-1

Policies M 5.1.2 "Appropriate Bikeway Facilities" and M 5.1.7 "Bikeway Requirements" state that bikeways shall be consistent with the street functional classification and street typology described in policy M 4.4.1 "Roadway Network Development". Policy M 4.4.1 does not, however, currently describe what are considered "appropriate bikeway facilities" for each class and type of street (e.g. mixed-use minor arterial).

02-2

Therefore, we request that the following policy be added to GPU Section M5 (or similar language be added to existing policy M 5.1.2):

M 5.1.x "Definitions of Bicycle Friendly Facilities" The City shall adopt definitions of bike-friendly facilities for each class and type of street as part of its next update of the Bicycle Master Plan.

For example, establishing bike-friendly conditions on a major arterial will require different bike facilities than on a minor collector because of substantially different traffic speeds and volumes. Bike lanes will present high stress for bicyclists on streets with multiple lanes in the same direction and with turbulent, high speed traffic; in such conditions, only separation of bike lanes from traffic can be considered bike friendly and suitable for all ages and abilities of bicyclists. In contrast, bike lanes can provide low-stress conditions where streets have only single traffic lanes in each direction, where vehicle speeds are slow and volumes are low, and where the bike lanes are adequately clear of parked-car doors.

02-2
cont.

Bicycle Access to Transit Facilities. The M5 Bikeways section does not currently address access to transit facilities from surrounding neighborhoods, business districts, and employment centers. As has been well documented, ensuring excellent bicycle access to transit hubs is a key way to reduce the “first and last mile problem” for public transit networks. In fact, the City’s plan to establish a bike-share program is fundamentally aimed at solving this problem. If, however, bike-friendly bikeways are not available within the first and last miles to transit hubs (e.g. the Sacramento Valley Station), the bike-share program will be severely hampered. Therefore, we request that the following policy be added to GPU Section M5:

02-3

M 5.1.y “Bicycle Access to Transit Facilities” The City shall provide bike-friendly facilities to connect transit hubs with surrounding employment centers, business districts, cultural amenities, and neighborhoods.

Comments on Mobility Section M4 Streets and Roadways. Mobility Policy M 4.4.1 “Roadway Network Development” states that the City shall develop a roadway network that is classified by street function and by type of street context and travel-mode priority. “Major arterials” are described as four- to six-lane streets for long distance trips and mobility of people and goods, whereas “minor arterials” are described as two-lane streets; neither description encompasses the several 3-lane, one-way streets that cross downtown and midtown. The text descriptions for the functional classes should fully describe and encompass the actual street conditions of the City, especially in light of the City’s currently underway Downtown Transportation Study (DTS). The DTS work program states that the DTS will rely on the 2035 GPU’s expanded street typology to help establish modal priorities for downtown and midtown streets.

02-4

The maps of street classes shown in Figures M4 and M4A distinguish between major and minor collectors but do not distinguish between major and minor arterials. We request that these 2 types of arterials be depicted separately, especially on Figure M4A, the Central City Inset, because of the functional distinctions between these two classes and their high importance for all modes of travel in the downtown and midtown areas.

The text discussion of street functional classes in Policy M 4.4.1 “Roadway Network Development” should make clear that the number of lanes shown in Figures M4 and M4A may be reduced from those shown, so as to be consistent with Goal M 4.2 “Complete Streets” (especially Policies M 4.2.2 “Pedestrian and Bicycle-Friendly Streets” and M 4.2.6 “Identify and Fill Gaps in Complete Streets”).

02-5

The Street Typology described in Policy M 4.4.1 states that “residential streets” are to emphasize “walking, bicycling, and property access” (with the exception of residential minor arterials) and that all “mixed use streets” are to promote walking, bicycling, and transit. Most of the streets in the Central City Inset (Figure M5a) are designated as “mixed use streets.” This policy statement highlights the importance of the City adopting definitions of bicycle-friendly bikeways for all functional classes and types of streets as requested in our comments above. In fact, Policy M 4.2.2 states that “the City shall ensure that all street projects shall support pedestrian and bicycle travel” in areas with high pedestrian activity which certainly characterizes the downtown/midtown area that is the subject of the DTS.

02-6

In summary, our comments on Mobility Section M4 are the following:

1. Expand the descriptions for street functional classes and types to fully represent the actual street conditions of the City (e.g. 3-lane, one-way streets in downtown and midtown),
2. Depict major and minor arterials separately in Figures M4 and M4A,
3. Clarify that numbers of lanes shown in Figures M4 and M4A may be reduced to comply with Policies M 4.2.2. and M 4.2.6, and
4. Adopt definitions of bicycle-friendly bikeways for all functional classes and types of streets to support implementation of Policy M 4.2.2.

02-6
cont.

Comments on Mobility Implementation Programs. We have the following comments and questions about the Mobility Implementation Programs presented on pages 2-129 to 2-132 of the Draft GPU:

- Program 1 – This program states that the City shall prepare and adopt design standards and guidelines for all (travel) modes and prioritize selected modes for each street segment. We heartily support this implementation program but the cited policies which this program is to implement seem poorly coordinated. We believe this program should implement the following policies pertinent to bicycling among other policies pertinent to other modes:
 - M 4.2.2 Pedestrian and Bicycle Friendly Streets
 - M 4.2.6 Identify and Fill Gaps in Complete Streets
 - M 5.1.3 Continuous Bikeway Network
 - M 5.1.x Definitions of Bicycle Friendly Facilities (requested in our comments above)
 - M 5.1.y Bicycle Access to Transit Facilities (requested in our comments above)

02-7

Because this implementation program seems to be a very large and complex undertaking, we request that it be subdivided into more manageable tasks.

- Program 2 – This program will appropriately update the City’s Traffic Impact Analysis guidelines to recognize new developments in CEQA compliance. However, it refers to “General Plan modal priorities” which we have not found described in the GPU Mobility Element. Please explain what these modal priorities are and how they have been developed.

02-8

- Program 10 – Under this program, the City shall update its Bicycle Master Plan (BMP) every 10 years. The City’s current BMP was adopted in 1995, 19 years ago, although several amendments have been adopted more recently to add specific bikeway improvements to the plan. The contemporary philosophy and practice of bikeway infrastructure in the United States has advanced very rapidly in recent years as can be seen by improvements for bicycle travel in many U.S. cities such as San Francisco and Chicago and as documented in the NACTO Urban Bikeway Design Guide (<http://nacto.org/cities-for-cycling/design-guide>).

02-9

The Implementation Program for the 2030 General Plan (adopted in March 2009) stated that the BMP would be updated every 3 years (Program 18). We have seen no evidence that the City attempted to do an update since 2009. We request that the City take this implementation program to heart and commit actual resources of staff and budget to make sure this update happens in a timely and robust manner (e.g. by 2015 at the latest).

- Program 11 – This program states in part that the City shall implement the BMP by “expanding the existing bikeway system by 5 percent annually.” This implementation program appears to be based on Measure 2.3 “Increased Bicycle Mode Share” in the City’s Climate Action Plan (CAP) adopted in February 2012. Measure 2.3 in the CAP was supported by Action 2.3.1 stating that the City would achieve an annual expansion of 5 percent of the existing bikeway system which

02-10

was said to result in a 1.5 percent reduction in vehicle miles traveled (VMT) by 2020. Finally this reduction in VMT was said to produce a specified level of reduction of greenhouse gases.

We agree that a reduction in VMT will reduce greenhouse gases and we agree that an increase in bicycle mode share will help reduce VMT. The GPU, however, does not present evidence that increasing the bikeway system by 5 % annually (however that is defined and measured) will produce the necessary increase in bicycle mode share that will reduce VMT by 1.5%. In response to this lack of evidence, the CAP committed to a Supporting Action for Measure 2.3: “Work with community partners to establish a bicycle mode share goal and methodology [for monitoring progress to achieve that goal]” (see Page 4-32 of CAP adopted in February 2012). We greatly support this supporting action and believe the community partners should include the Sacramento Area Council of Governments (SACOG) that routinely models and monitors changes in travel mode shares and associated VMT.

Bike mode share is a function of many factors including at least the following:

Direct Factors

- Bikeway quality relative to function and type of street on which located (e.g. high volume, high speed arterials will require highly protective bike facilities to be safe and comfortable for most potential bike riders; a low volume, low speed residential street will be comfortable for most riders without improvement)
- Bikeway quantity (i.e. miles)
- Bikeway context (e.g. in high density residential/commercial mixed use neighborhoods like Midtown or in low density residential suburbs)
- Continuity of bikeways between key destinations and activity centers
- Availability of secure bike parking and other support at destinations

Indirect Factors

- Education and enforcement of roadway users about right-of-way, speed, and signal violations
- Education about bikeway network availability (e.g. way-finding, maps)
- Transportation culture and demographics of neighborhoods (e.g. SACOG has reported that bike mode share is expected to increase more in disadvantaged neighborhoods when facilities are improved than in other neighborhoods because of their reliance on non-vehicle travel)
- Staffing and financial resources for bikeway planning and implementation

Given the complexity of factors that govern bike mode share, we believe that it is not appropriate to measure the success of the BMP relative to a goal of “expanding the existing bikeway system by 5 percent annually.” Instead, we believe the BMP should fundamentally aim for a bicycle mode share goal that will eventually be relatable to an expected reduction in VMT, which is actually the intent of the CAP now incorporated in the GPU.

Sacramento’s current bicycle mode share is reported to be 2.6% (for commuting) in the 2013 American Community Survey. We believe that Sacramento’s BMP should aim to achieve a bike mode share of 5% by 2020 and 10% by 2030; these goals for Sacramento fit well within the range of bike mode share goals recently adopted by other California cities: by 2020, San Francisco aims to achieve 10%, Davis 30%, and Fresno 5%. The BMP should then encompass a set of objectives and implementing actions that would address the direct and indirect factors listed above that determine actual bike mode share.

O2-10
cont.

In summary, our comment on Program 11 is the following: Replace the current wording with the following: "The City shall 1) implement the Bikeway Master Plan to achieve a bicycle mode share goal of 5% by 2020 and 10% by 2030, and 2) work with community partners to develop a methodology for measuring bicycle mode share and relating it to reductions in VMT for Sacramento."

02-10
cont.

Thank you for considering our comments. Please let us know if you would like to discuss any of these comments or if you would like any additional information about them.

Sincerely,



Jordan Lang
Project Analyst

CCs: Paul Philley, SMAQMD (pphilley@airquality.org)
Ed Cox, City of Sacramento Alternative Modes Coordinator (ecox@cityofsacramento.org)
Jim McDonald, City of Sacramento Community Development Department
(jmcdonald@cityofsacramento.org)

Citation:
Mekuria, Maaza, Peter Furth, and Hilary Nixon. *Low-Stress Bicycling and Network Connectivity*.
Mineta Transportation Institute, San Jose State University. May 2012. Report 11-19.

Letter 02 Response	Sacramento Area Bicycle Advocates Jordan Lang, Project Analyst 9-10-14
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- 02-1 The comment provides additional policy consideration related to bicycle facilities. The comment does not raise environmental issues or issues related to the adequacy of the Draft MEIR, and no further response is necessary under CEQA. This comment will be provided to the decision makers for consideration; City staff's response to this comment will be included as an appendix to the staff report.
- 02-2 The comment provides additional policy consideration related to bicycle facilities. The comment does not raise environmental issues or issues related to the adequacy of the Draft MEIR, and no further response is necessary under CEQA. This comment will be provided to the decision makers for consideration; City staff's response to this comment will be included as an appendix to the staff report.
- 02-3 The comment provides additional policy consideration related to bicycle facilities. The comment does not raise environmental issues or issues related to the adequacy of the Draft MEIR, and no further response is necessary under CEQA. This comment will be provided to the decision makers for consideration; City staff's response to this comment will be included as an appendix to the staff report.
- 02-4 The comment provides additional policy consideration related to bicycle facilities. The comment does not raise environmental issues or issues related to the adequacy of the Draft MEIR, and no further response is necessary under CEQA. This comment will be provided to the decision makers for consideration; City staff's response to this comment will be included as an appendix to the staff report.
- 02-5 The comment provides additional policy consideration related to bicycle facilities. The comment does not raise environmental issues or issues related to the adequacy of the Draft MEIR, and no further response is necessary under CEQA. This comment will be provided to the decision makers for consideration; City staff's response to this comment will be included as an appendix to the staff report.
- 02-6 The comment provides additional policy consideration related to bicycle facilities. The comment does not raise environmental issues or issues related to the adequacy of the Draft MEIR, and no further response is necessary under CEQA. This comment will be provided to the decision makers for consideration; City staff's response to this comment will be included as an appendix to the staff report.
- 02-7 The comment provides additional policy consideration related to bicycle facilities. The comment does not raise environmental issues or issues related to the adequacy of the Draft MEIR, and no further response is necessary under CEQA. This comment will be provided to the decision makers for consideration; City staff's response to this comment will be included as an appendix to the staff report.
- 02-8 The comment provides additional policy consideration related to bicycle facilities. The comment does not raise environmental issues or issues related to the adequacy of the Draft MEIR, and no further response is necessary under CEQA. This comment will be provided to the decision makers for consideration; City staff's response to this comment will be included as an appendix to the staff report.

- 02-9 The comment provides additional policy consideration related to bicycle facilities. The comment does not raise environmental issues or issues related to the adequacy of the Draft MEIR, and no further response is necessary under CEQA. This comment will be provided to the decision makers for consideration; City staff's response to this comment will be included as an appendix to the staff report.
- 02-10 The commenter indicates a lack of substantiation for the VMT reduction associated with General Plan policies for expansion of the bikeway system, which are based on 2012 Climate Action Plan (CAP) measures. Fehr & Peers (transportation consultants for the CAP, the proposed 2035 General Plan, and the Draft EIR) used the same VMT reduction calculation methodology for both the proposed 2035 General Plan and the approved CAP (See Appendix F of the Draft MEIR for the full spreadsheet). The commenter goes on to primarily recommend additional policy considerations. These comments do not raise environmental issues or issues related to the adequacy of the Draft MEIR. This comment will be provided to City Council for consideration. No further response is necessary.



CONGRESS OF CALIFORNIA SENIORS

1230 "N" STREET, SUITE 201, SACRAMENTO, CA 95814 • (916) 442-4474 • (800) 543-3352 • FAX (916) 442-1877 • www.seniors.org

Letter
03

September 22, 2014

Tom Pace, Principal Planner
Remi Mendoza, Associate Planner
City of Sacramento
915 I Street
Sacramento, CA 95814

Dear Mr. Pace:

The Congress of California Seniors is a non-profit education and advocacy organization in California. We are consistently asked to speak out on issues concerning seniors and usually take a position on ballot initiatives and landmark legislation. Our senior leaders have worked hard on behalf of seniors since our founding in 1977.

With the emergence of the "Baby Boomer" generation, our challenges to address the needs of older Californians are greater than ever. The number of seniors in California will double in the decades ahead and those over the age of 85 are the fastest growing segment of our population.

We are pleased that the City of Sacramento has included in its current general plan the Caring Neighborhoods program under the Older Adult Services division of the City of Sacramento's Parks and Recreation Department. For seniors who are aging in place it is important that they remain connected to their communities. Without caring interactions seniors are more vulnerable to elder abuse and self neglect.

As the City of Sacramento updates the General Plan through 2035 we encourage you to include policy direction that includes the changing age demographics of the city, including the Caring Neighborhoods program.

Sincerely,

Henry L. "Hank" Lacayo
State President

03-1

**Letter
03
Response****Congress of California Seniors**
Henry L. Lacayo, State President
9-22-14

- 03-1 The commenter expresses appreciation that the City included the Caring Neighborhood program and encourages the City to include policy direction that addresses the changing demographics of the city, including the Caring Neighborhoods program. The comment does not raise environmental issues or issues related to the adequacy of the Draft MEIR, and no further response is necessary under CEQA. This comment will be provided to the decision makers for consideration; City staff's response to this comment will be included as an appendix to the staff report.

Letter
04

East Sacramento Preservation Neighborhood Association
PO Box 191763
Sacramento, CA 95819
contact@eastsacpreservation.org

September 24, 2014

Scott Johnson, Associate Planner
City of Sacramento, Community Development Department
Environmental Planning Services
300 Richards Boulevard, Third Floor Sacramento, CA 95811
SRJohnson@cityofsacramento.org
(916) 808-5842

RE: Public Comments for the Draft Sacramento 2035 General Plan

Dear Mr. Johnson:

The East Sacramento Preservation Neighborhood Association is concerned with changes to park acreage service levels, policy shifts and changes to levels of service for the mitigation of traffic, and overall changes that threaten trees, and the Urban Forest in Sacramento.

04-1

Park Acreage Service Levels

Sacramento’s current Park Acreage Service Level goal is 5 acres per 1,000 residents. The city currently only has 3.4 acres of neighborhood and community parks per 1,000 residents. As it stands now, we need to increase our park acreage to meet our goal as our population grows.

However, the Sacramento 2035 General Plan Update proposes a significant reduction to the Park Acreage Service Level Goal from 5 acres per thousand residents to 3.5 acres outside the Central City and 1.75 per thousand residents within the Central City.

In providing the rationale for further decreasing the amount of park space available to our public the City states “Parkland acquisition, particularly in developed urban areas, is often not feasible. Development sites are either too small to dedicate parkland, other vacant land is in short supply, or development costs (including in-lieu fees) make projects infeasible.”

04-2

We respectfully request that the City provide the public the evidence to back up the claims that acquisition and development, and associated costs/fees, are “often not feasible”, and “make projects infeasible”.

Without such critical information, how is the public to know if indeed the term “infeasible” is accurate?

We certainly appreciate and look forward to continued engagement regarding planning our future park space. We do though need more information regarding this important issue.

Therefore, we respectfully oppose the proposed reductions in Park Acreage Levels of Service and reductions in revenue streams (i.e. Quimby in lieu of fees) to provide for their upkeep - at least until more specific evidence is provided to constitute the use of the term “infeasible”. Parks are one of the most valuable assets of our City and the public deserves to see the facts that bear out the claims the City, and or developers, provide.

In general we oppose changes to our park system which will increase the wear and tear on existing parks while reducing revenue streams that are essential to ensure their long term health and vibrancy. We believe the proposed changes indicate that the quality of our parks will be degraded, and thus in the long run will degrade the overall value and desirability of living in our City.

Traffic Level of Service

Traffic Level of Service: The current traffic LOS standard typically requires mitigation that results in increases in road size inconsistent with urban land uses. The 2035 General Plan includes a policy shift that would maximize the efficiency of the roadway network for all transportation modes while minimizing potential negative impacts. These objectives would be balanced by maintaining citywide traffic expectations at LOS D while identifying areas and streets where other community values are more important than maximizing traffic flow. These new areas include Priority Investment Areas, where transit use, walking and biking are prioritized and where there is not sufficient space to widen roadways. Additionally, streets projected to have LOS E or F by 2035 will not be required to operate at LOS D.

While it is sensible that the Sacramento 2035 General Plan Update address a metric that has had unintended and negative impacts on sustainable development for decades, it is also important that other aspects of traffic impacts not be ignored or whitewashed in this process. Typically neighborhood concerns with regard to new traffic being introduced to residential areas from development proposals or roadway modifications do not center solely on inconvenience to motorists at controlled intersections. As you know this is essentially what LOS measures.

Many neighborhood residential occupants are more concerned with the introduction of additional cars on streets that have typically seen low to moderate volumes of traffic and what that means for their quality of life, particularly with regard to noise, safety and new sources of air pollution.

This change to the General Plan does not at all address those concerns which may result in parents feeling that their children can no longer play in their front yards or that any health issues that their family is experiencing will likely be exacerbated by additional vehicular emissions. The proposed update still focuses on roadway users, be they vehicles, bicycles or pedestrians on

04-2
cont.

04-3

sidewalks, and not on the traffic impacts, particularly of pollution, on the residents that front those roadways.

04-3
cont.

Furthermore, many existing low volume streets will still be well within the LOS D expectation even if their traffic volumes are doubled or tripled. This was the case for many of the Midtown and East Sacramento residential streets soon to be impacted by the new traffic from the McKinley Village project. Many homeowners had purchased their properties in the expectation that it would always be a relatively quiet street, safe for their children to play near, but major projects can completely change that character. EIR analyses of LOS completely ignore this more micro-level environmental impact.

04-4

The primary driver of the need to measure traffic impacts is to reduce local and regional air pollution. As the City looks the other way while some streets degrade to LOS E or F levels that might encourage a few drivers to start using bicycles or our less-than-robust transit system, the real world result will be an increase in air pollution for those properties that front the now traffic-clogged streets full of idling vehicles. The impression given is that this update is more about reducing possible roadblocks to development than it is about actually reducing pollution.

04-5

Finally, as we are sure you are well aware; the State is currently reforming its reliance on LOS in environmental studies through SB 743. They appear to be settling on a Vehicle Miles Traveled (VMT) metric as a better method for evaluating traffic impacts from new projects. Would it make more sense for this update to anticipate that change and try to incorporate VMT as a better way to measure traffic impacts to both road users and property owners? If someone lives mid-block on a residential street with controlled intersections on both ends, that person’s awareness of the environmental impact of new traffic is better represented by the number of VMT in front of their house than they would be by the LOS at distant stop signs or traffic lights.

04-6

We urge a more holistic approach to the environmental impacts of increased traffic due to additional development. This approach should not only measure impacts to roadway users but should also acknowledge burdens placed upon the people that reside on those roadways.

04-7

Sacramento Urban Forest

Sacramento is know world wide as the “city of trees”. Our tree lined streets, beautiful parks, and open natural spaces, are perhaps the most attractive parts of Sacramento. Many people chose to live in Sacramento precisely because of its natural beauty. Because of this, and many other benefits such as health, and overall quality of life, we believe that our trees and natural settings are worthy of particular attention when planning development.

04-8

We therefore request that the City provide more quantifiable data in regards to measuring the true value of our parks, trees, urban forest, and tree canopy. We would like to ensure that these special assets of our City not only be protected, but be allowed to grow and thrive throughout our

neighborhoods, and that the amount of land we dedicate to nature increase as our population grows.

04-8
cont.

We are lucky. Youth throughout our neighborhoods are being taught in school how to be good leaders, and careful stewards of our environment, our food, plants, trees and animals. Witness the “Science Alive” program at Theodore Judah Elementary School and the boost in science scores the students there are achieving through “hands on learning”.

Also witness our youth entering colleges in our community and across the nation with an increased desire to act locally and think globally when addressing the value of our forests, environment, and nature. Now, more than ever, the world is recognizing the importance of preserving and caring for our environment, including of course trees, climate, and the air we all must breath.

Emerging alongside these trends are new and more accurate methods of economic accounting which greatly improve our ability to make well thought out long term decisions in regards to preserving the true value of our natural habitats. For example, see Trust for Public Land, “Measuring the Economic Value of a City Park System,” 2009, or “Northern California Coast Community Tree Guide Benefits, Costs, and Strategic Planning,” April 2010, E Gregory McPherson, James R. Simpson, Paula J. Peper, Aaron M.N. Crowell and Quingfu Xias.

04-9

We feel that new research and economic models need to be included in any long term cost-benefit analysis because they are more accurate, and provide the public with more meaningful information to measure the impacts of development and growth on our most valuable, and perhaps least protected, assets - namely our environment, air, natural resources, trees and parklands. These all relate directly to the health and quality of life of our community now and into the future. They need to be properly accounted for in terms of their economic value and we share the concerns expressed by many other communities in the “Joint Letter from Community Groups and Individuals”

Respectfully,



Michael Saeltzer

President, East Sacramento Preservation Neighborhood Association

Letter 04 Response	East Sacramento Preservation Neighborhood Association Michael Saeltzer, President 9-24-14
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- 04-1 This letter is nearly identical to Individual Comment Letter I48 submitted by Michael Saeltzer. Please refer to the response to comment I48-1.
- 04-2 This letter is nearly identical to Individual Comment Letter I48 submitted by Michael Saeltzer. Please refer to the response to comment I48-1.
- 04-3 This letter is nearly identical to Individual Comment Letter I48 submitted by Michael Saeltzer. Please refer to the response to comment I48-2.
- 04-4 This letter is nearly identical to Individual Comment Letter I48 submitted by Michael Saeltzer. Please refer to the response to comment I48-3.
- 04-5 This letter is nearly identical to Individual Comment Letter I48 submitted by Michael Saeltzer. Please refer to the response to comment I48-4.
- 04-6 This letter is nearly identical to Individual Comment Letter I48 submitted by Michael Saeltzer. Please refer to the response to comment I48-5.
- 04-7 This letter is nearly identical to Individual Comment Letter I48 submitted by Michael Saeltzer. Please refer to the response to comment I48-6.
- 04-8 This letter is nearly identical to Individual Comment Letter I48 submitted by Michael Saeltzer. Please refer to the response to comment I48-7.
- 04-9 This letter is nearly identical to Individual Comment Letter I48 submitted by Michael Saeltzer. Please refer to the response to comment I48-8.

Letter
05

September 24, 2014

Scott Johnson, Associate Planner
City of Sacramento
Community Development Department
Environmental Planning Services
300 Richards Boulevard
Third Floor Sacramento, CA 95811
SRJohnson@cityofsacramento.org
(916) 808-5842

Dear Mr. Johnson:

The City of Sacramento (“City”) is currently in the process of updating its General Plan (“General Plan”). We, the undersigned, are concerned about the proposal in the General Plan to change the designated level of service (“LOS”) on various City streets to LOS F. It is our understanding that LOS is used to measure performance levels at street intersections and on roadways, with LOS A being considered the best conditions and LOS F being the worst.

05-1

Designating residential streets at LOS F means the City expects that the residents will have to endure ever increasing traffic volumes without consideration for methods to reduce or reroute traffic. Also, we believe that the overall LOS standard does not measure impacts to residents as it relates to neighborhood livability (e.g., how a resident experiences the impact of street traffic on safety, air quality, noise, congestion, walkability, bicycle safety, etc.).

The General Plan proposes to change the acceptable LOS on Carlson Drive, Elvas Avenue, and H Street to LOS F, when we believe that the 2009 General Plan allowed the LOS on those streets to be, at times, A-E. Eliminating the flexibility for certain residential streets to be at LOS A-E and, instead, designating those streets at LOS F seems to conflict with certain General Plan goals and policies to enhance the quality of life within existing neighborhoods and to reduce traffic and parking problems in residential neighborhoods. Not only will a higher level of traffic be permanently permitted for the above residential streets, but also the increase in traffic could cause vehicles to cut through other neighboring residential streets to bypass congestion, which in turn would increase traffic to those streets.

05-2

For example, the General Plan Mobility Goal 4.3 states: “Neighborhood Traffic. Enhance the quality of life within existing neighborhoods through the use of neighborhood traffic management and traffic calming techniques, while recognizing the City’s desire to provide a grid system that creates a high level of connectivity.” In addition, General Plan Policy M 4.3.1 - Neighborhood Traffic Management states: “The City shall continue *wherever possible* to design streets and approve development applications in a manner as to reduce high traffic flows and parking problems within residential neighborhoods.” (Emph. added.) We believe these General Plan provisions do not support designating the above residential streets at LOS F.

September 24, 2014

In addition, certain areas within the City have previously and still are designated at LOS F (e.g., the Core Area). The City has stated in its General Plan that it may require certain measures and improvements that would help alleviate traffic congestion such as bicycle or transit improvements (see M. 1.2.5). We ask that there be a more robust discussion with City residents to better understand the ideas and the funding sources the City would use to implement improvements and/or mitigation measures. These discussions may include identifying implementation programs in addition to and with greater specificity than those currently proposed in the City's General Plan Update.

05-3

We ask that the City not designate the above noted residential streets at LOS F to allow the City to continue to work with the residents to find solutions to alleviate residential street traffic. We also ask that the City continue to work with residents to develop mitigation measures and other improvements for areas in the City where the streets are and previously were at LOS F.

Please provide written notice of the availability of the Final MEIR and all related documents, including your response to these comments, to the undersigned at contact@eaststacpreservation.org.

Very truly yours,

PRESIDENT EAST SACRAMENTO PRESERVATION
NEIGHBORHOOD ASSOCIATION

Caroline Goddard
President
East Sacramento Partnerships
for a Livable City

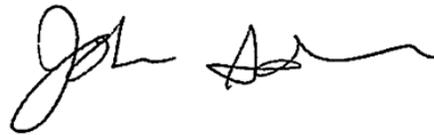
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Susan M. Ballew
1521 37th Street
Sacramento 95816

Wilee Dreen
425 SAN MIGUEL WAY
SACRAMENTO, CA 95819

diane adamo
3150 H St
Sacramento, CA 95816

A handwritten signature in black ink, appearing to be 'JPL' followed by a stylized flourish.

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John Ph.D.

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Letter 05 Response	Same Letter as 05a 9-24-14
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- 05-1 The commenter states concern regarding the modification of the LOS standard to LOS F in portions of the City, and states that this standard would result in residential streets experiencing increased traffic volumes. The commenter goes on to state that the LOS standard does not measure impacts to neighborhood livability. The LOS policy in the current General Plan includes a “Core Area” LOS exemption that results in an LOS F standard for the most urbanized areas of the City. This policy recognizes that roadway widening in this area to achieve improved levels of service would detract from other City goals, including providing an environment that is attractive and safe for pedestrians, bicyclists, and transit riders. The proposed changes to Policy M 1.2.2 contained in the General Plan Update would result in a slight modification of the Core Area exemption in addition to allowing LOS in Priority Investment Areas and on select roadway segments. Please refer to Master Response 4.1.2, “Neighborhood Livability Master Response,” for additional information.
- 05-2 The commenter states concern regarding the modification of Policy M 1.2.2 to accept LOS F on Carlson Drive, Elvas Avenue, and H Street and goes on to state that this modification runs counter to City goals involving neighborhood traffic management. As documented in the Background Report (Appendix C of the Draft MEIR) and Appendix D of the Draft MEIR, the segments of Carlson Drive and H Street that listed in Policy M 1.2.2 currently operate at LOS F. The modification of this policy to allow LOS F on these roadways under cumulative year (2035) conditions is in recognition that widening these roadways to achieve improved levels of service is not planned and may not be desirable as it could conflict with other City goals contained in the General Plan. The Draft MEIR analysis also indicates that implementation of the 2035 General Plan would result in LOS F conditions under cumulative year (2035) conditions on portions of Elvas Avenue; similarly, Elvas Avenue is not planned to be widened, and doing so may not be desirable as it could conflict other goals contained in the General Plan. This comment primarily raises policy issues and policy constancy issues and does not raise issues or concerns regarding the adequacy, accuracy, or completeness of the environmental document. Please refer to Master Response 4.1.2 for additional information.
- 05-3 The commenter states that the Core Area of the City would still have a standard of LOS F in the General Plan Update, and asks for greater specificity regarding improvements to bicycle facilities and transit in this area. The commenter accurately states that LOS F would remain acceptable within the Core Area with implementation of the 2035 General Plan Update. This comment does not raise issues or concerns regarding the adequacy, accuracy, or completeness of the environmental document. The comment will be provided to the decision makers for their consideration.
- The commenter also reiterates concern regarding specific streets where LOS F conditions would be allowed under Policy M 1.2.2, and requests that a delay in the implementation of this policy to allow time for the development of mitigation measures. As documented on page 4.12-24 of the Draft MEIR, implementation of the 2035 General Plan would not result in adverse impacts to roadways within the City of Sacramento, and therefore, mitigation measures are not required. Please refer to responses to comments 05-1 and 05-2 for additional information regarding roadways with an LOS F designation.

Letter 05a

CITY OF SACRAMENTO
DOWNTOWN PERMIT
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SEP 25 2014

RECEIVED

September 24, 2014

Scott Johnson, Associate Planner
City of Sacramento
Community Development Department
Environmental Planning Services
300 Richards Boulevard
Third Floor Sacramento, CA 95811
SRJohnson@cityofsacramento.org
(916) 808-5842

Dear Mr. Johnson:

The City of Sacramento (“City”) is currently in the process of updating its General Plan (“General Plan”). We, the undersigned, are concerned about the proposal in the General Plan to change the designated level of service (“LOS”) on various City streets to LOS F. It is our understanding that LOS is used to measure performance levels at street intersections and on roadways, with LOS A being considered the best conditions and LOS F being the worst.

Designating residential streets at LOS F means the City expects that the residents will have to endure ever increasing traffic volumes without consideration for methods to reduce or reroute traffic. Also, we believe that the overall LOS standard does not measure impacts to residents as it relates to neighborhood livability (e.g., how a resident experiences the impact of street traffic on safety, air quality, noise, congestion, walkability, bicycle safety, etc.).

The General Plan proposes to change the acceptable LOS on Carlson Drive, Elvas Avenue, and H Street to LOS F, when we believe that the 2009 General Plan allowed the LOS on those streets to be, at times, A-E. Eliminating the flexibility for certain residential streets to be at LOS A-E and, instead, designating those streets at LOS F seems to conflict with certain General Plan goals and policies to enhance the quality of life within existing neighborhoods and to reduce traffic and parking problems in residential neighborhoods. Not only will a higher level of traffic be permanently permitted for the above residential streets, but also the increase in traffic could cause vehicles to cut through other neighboring residential streets to bypass congestion, which in turn would increase traffic to those streets.

For example, the General Plan Mobility Goal 4.3 states: “Neighborhood Traffic. Enhance the quality of life within existing neighborhoods through the use of neighborhood traffic management and traffic calming techniques, while recognizing the City’s desire to provide a grid system that creates a high level of connectivity.” In addition, General Plan Policy M 4.3.1 - Neighborhood Traffic Management states: “The City shall continue *wherever possible* to design streets and approve development applications in a manner as to reduce high traffic flows and parking problems within residential neighborhoods.” (Emph. added.) We believe these General Plan provisions do not support designating the above residential streets at LOS F.

05a-1

September 24, 2014

In addition, certain areas within the City have previously and still are designated at LOS F (e.g., the Core Area). The City has stated in its General Plan that it may require certain measures and improvements that would help alleviate traffic congestion such as bicycle or transit improvements (see M. 1.2.5). We ask that there be a more robust discussion with City residents to better understand the ideas and the funding sources the City would use to implement improvements and/or mitigation measures. These discussions may include identifying implementation programs in addition to and with greater specificity than those currently proposed in the City's General Plan Update.

We ask that the City not designate the above noted residential streets at LOS F to allow the City to continue to work with the residents to find solutions to alleviate residential street traffic. We also ask that the City continue to work with residents to develop mitigation measures and other improvements for areas in the City where the streets are and previously were at LOS F.

Please provide written notice of the availability of the Final MEIR and all related documents, including your response to these comments, to the undersigned at contact@eastsacpreservation.org.

Very truly yours,

PRESIDENT EAST SACRAMENTO PRESERVATION
NEIGHBORHOOD ASSOCIATION

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For a Livable City

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Neighbors South of the River Sacramento
481 Hartnack Place Sacramento
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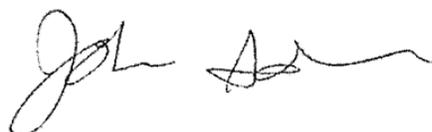
Jane Macaulay
President, Woodlake Neighbors Creating Transparency

05a-1
cont.

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1521 37th Street
Sacramento 95816

Will Dren
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diane adamo
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**Letter
05a
Response****East Sacramento Preservation Neighborhood Association**

Michael Saeltzer, President
East Sacramento Partnerships for a Livable City
Caroline Goddard, President
Neighbors for a Better Sacramento
Richard Lyndon, President
Woodlake Neighbors Creating Transparency
Jane Macaulay, President
and individual signatories
9-25-14

05a-1 This letter is nearly identical to Individual Comment Letter 05. Please refer to the responses to comment 05-1 through 05-3.



Save the American River Association

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Letter 06

2014 Board of Directors

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 David Thesell
 Linda Villatore
 Leo Winternitz

September 24, 2014

Scott Johnson, Associate Planner
 City of Sacramento, Community Development Department
 Environmental Planning Services
 300 Richards Boulevard, Third Floor
 Sacramento, CA 95811

Subject: Draft Master Environmental Impact Report For The City of Sacramento
 2035 General Plan Update (LR12-003)(SCH#: 2012122006)

Dear Mr. Johnson,

Save The American River Association (SARA) appreciates the opportunity to submit the following comments regarding the above subject, specifically as it relates to Parks and Recreation.

SAVE THE AMERICAN RIVER ASSOCIATION

SARA was founded in 1961 to establish the American River Parkway. Beginning with a band of seven, including Effie Yeaw, the long held vision to preserve the natural landscape and create recreation opportunities along the lower American River took years to achieve. A *Sunset Magazine* article written to commemorate the Parkway’s dedication in the summer of 1964, described a county official as saying “Thus far, everybody but the United Nations has had a hand in the parkway.” (*Sunset*, October 1964) The American River Parkway is the gift far-thinking, civic minded community members and leaders gave to us, the residents of a rapidly expanding urban area who increasingly understand the value of the places that give us relief from our fast paced and over built world. SARA continues today, as we have for the past 53 years, to be the lead voice and advocate protecting the natural and recreation values of the lower American River and Parkway.

AMERICAN RIVER PARKWAY

The American River Parkway is a vital environmental, recreation, aesthetic and economic resource for the Sacramento region. The Parkway spans 31 miles from the confluence of the American and Sacramento Rivers to Beal’s Point,

Guardians of the American River and Parkway since 1961

and encompasses close to 5,000 acres of land and 23 miles of river. It is home to multitudes of plants, animals, birds and fish. The Parkway boasts more than 8 million visits per year – more even than Yosemite.

Highlighting its importance is the recent honor awarded the American River Parkway by the California Parks and Recreation Society, District 2, naming the Parkway to its Hall of Honor 2012 as a Regional Treasure. Indeed it is often referred to as the “crown jewel” of Sacramento.

The American River Parkway is protected under federal and state law through designation as a National and State Wild and Scenic River; through the state law Urban American River Parkway Preservation Act (Public Resources Code §5840, et al). The Parkway’s land uses are governed by the American River Parkway Plan, which was adopted most recently in 2008 by the County of Sacramento, the manager and operator of the Parkway.

The State of California’s Urban American River Parkway Preservation Act provides for the following:

- “The Legislature hereby adopts the American River Parkway Plan so as to provide for the coordination with local agencies in the protection and management of the diverse and valuable natural land, water, native wildlife, and vegetation of the American River Parkway.”
- “Actions of state and local agencies with regard to land use decisions shall be consistent with the American River Parkway Plan...”
(Public Resources Code §5842)

AMERICAN RIVER PARKWAY AREAS WITHIN THE CITY OF SACRAMENTO

Areas within the City of Sacramento include Discovery Park (559.07 acres), Tiscornia Park (less than 10 acres), Woodlake (373 acres), Cal Expo (408.22 acres), Paradise Beach (108.2 acres), Campus Commons (152 acres), and Howe Avenue (160 acres). American River Parkway Plan 2008, Chapter 10, Area Plans, Pages 149-169.

COMMENTS ON THE DRAFT MEIR: 4.9 Parks and Recreation

LU 9.1.6: American River Parkway Plan

The policy mischaracterizes the American River Parkway Plan. It is not a “state approved land use and policy document.” The American River Parkway Plan is submitted to the state legislature for adoption through the Urban American River Parkway Preservation Act (Public Resources Code §5840, et al) and as such is state law.

06-1

4.9.2: Environmental Setting

The Draft MEIR states that as of today the City has 222 parks comprising 3,108 acres. Of these, the 1,573 acres are neighborhood and community parks and the remaining 1,535 acres are city and non-city regional parks. This provides a service level of approximately 3.4 acres of neighborhood and

06-2

community park per 1,000 persons citywide, as the city and non-city regional parks are not counted in the service level. 06-2
cont.

The Draft MEIR uses the words “persons”, “population”, and “residents” interchangeably when describing how many acres of neighborhood and community parks per 1,000 are provided or proposed to be provided. The definition of who is being served is not clear. 06-3

4.9.3: Impacts and Mitigation Measures

METHODS OF ANALYSIS

Does the Draft MEIR account for demands and impacts from Workforce and Visitors on neighborhood and community parks, especially in the Central City? 06-4

The Draft MEIR does not study the demands on city and non-city regional parks from current and future residents, workforce and visitors because of lack of adequate and nearby services in neighborhood and community parks. Therefore, no determination can be made regarding the impacts and what, if any, mitigations need to be adopted from the current level of service (3.4 acres of neighborhood and community parks per 1,000 persons City-wide) or the proposed 1.75 acres of neighborhood and community parks per 1,000 persons in the Central City, and 3.5 acres of neighborhood and community parks per 1,000 persons outside the Central City. 06-5

Basing the projected level of service demands of the Central City for neighborhood and community parks on the downtown park service level goals of other cities is, at best, a starting point, and at worst a meaningless exercise if you are not comparing apples to apples, and that has to include more than just current and future population numbers. 06-6

It is clear from the following policies and Draft MEIR statements that the City intends to heavily rely on the natural and recreation amenities of the American River Parkway, a non-city regional park whose acreage is NOT counted as part of the City’s Service Level Goal, to provide nature and recreation opportunities for its current and future residents, workforce and visitors, without an analysis of the potentially significant impacts to the lower American River and Parkway.

Policy ERC 2.2.3: Service Level Radius. The City shall strive to provide accessible public park or recreational open space within one-half mile of all residences. 06-7

The Draft MEIR acknowledges that changing the Service Level Goal in the Central City from 5 acres per 1,000 residents to 1.75 acres per 1,000 residents is “based on the City’s experience in identifying, acquiring, and operating park facilities. In particular, parkland acquisition, especially in urban areas, is often not feasible due to the scarcity of available land and resources needed to develop and operate park facilities. Common challenges are that dedicated sites may be too small to create a park of meaningful size, other vacant land may be in short supply, or park development costs (including in-lieu park fees) may make projects infeasible.” Evidently there is only about 16.5 acres of vacant land in the Central City

appropriate for additional parks. As a result, opportunities to develop new parks in the Central City are limited. | 06-7
cont.

The Draft MEIR did not study the potentially significant impacts from increased uses by current and future Central City residents, workforce and visitors on the American River Parkway, in particular those areas of the Parkway within one-half mile of all residences. | 06-8

Furthermore, based on the above statement in the Draft MEIR, will the City be relying on the American River Parkway, a non-city regional park, to achieve the parks and open space requirements of Policy LU 5.6.2, below? | 06-9

Policy LU 5.6.2: Family Friendly Downtown

The City shall promote the CBD as a family friendly area by requiring development of a variety of housing types, day care and school facilities, family-oriented services, and PARKS, plazas, and OPEN SPACES that will safely and comfortably accommodate those who wish to raise a family. (Capitals added)

Identify the Parks and Open Spaces the City intends to develop or use to accomplish this land use policy, now and in the future.

Policy ERC 2.2.6: Urban Park Facilities Improvements. In urban areas where land dedication is not reasonably feasible (e.g., the Central City) the City shall explore creative solutions to provide neighborhood park and recreation facilities (e.g., PROVISION OF COMMUNITY-SERVING RECREATIONAL FACILITIES IN REGIONAL PARKS) that reflect the unique character of the area. (Capitals added)
(MPSP) | 06-10

By regional parks, does this Policy include non-city regional parks such as The American River Parkway? If so, the Draft MEIR did not study the potentially significant impacts from increased uses by current and future Central City residents, workforce and visitors on the American River Parkway, in particular those areas of the Parkway within the Central City Policy Area. |

If the Policy does include non-city regional parks such as The American River Parkway, it appears to contradict the Draft MEIR statement “Land that may be developed in the future for parks and recreation uses, but NOT UNDER THE CITY’S JURISDICTION, WOULD NOT be considered a contribution towards meeting the Service Level Goal.” (Capitals added) | 06-11

Policy ERC 2.2.8: Capital Investment Priorities. The City shall give priority to the following parks and recreation capital investments: | 06-12

- Acquiring and developing areas for recreation use and public access along the banks of the American and Sacramento Rivers.

06-12
cont.

Identify what areas along the banks of the American River are under consideration for acquisition and development. How will their acquisition and development contribute to the City’s Parks and Recreation Service Level Goals?

Policy ERC 2.2.11: Range of Experience. The City shall provide a range of small to large parks and recreational facilities. Larger parks and complexes should be provided at the city’s edges and along the rivers as a complement to smaller sites provided in areas of denser development.

If by referencing “along the rivers,” the City is including The American River Parkway, a non-city regional park, as an area providing the larger parks and complexes that serve as a complement to smaller sites provided in areas of denser development, then the Draft MEIR failed to study the potentially significant impacts on the American River Parkway from increased uses by current and future residents, workforce and visitors, in particular those within the Central City Policy Area.

06-13

If by referencing “along the rivers,” the City is including The American River Parkway, a non-city regional park, it appears to contradict the Draft MEIR statement “Land that may be developed in the future for parks and recreation uses, but NOT UNDER THE CITY’S JURISDICTION, WOULD NOT be considered a contribution towards meeting the Service Level Goal.” (Capitals added)

Goal ERC 2.4: Rivers, Creeks and Natural Resource Areas. Provide positive recreational experiences and enjoyment of nature through the development, maintenance, patrol, and preservation of rivers, creeks and natural resource areas, while maximizing the use of these areas through partnerships with other agencies.

06-14

If by “Rivers” and “Natural Resource Areas” the City is including The American River Parkway, a non-city regional park, what is meant by “maximizing the use of these areas through partnerships with other agencies”? Is the intended “use” contributing towards meeting the Parks and Recreation Service Goals?

Policy ERC 2.4.1: Service Levels. The City shall provide 0.5 linear mile of parks/parkways and trails/bikeways per 1,000 population.

06-15

Does this Policy include the lands, trails and bikeways of The American River Parkway, a non-city regional park? If so, it appears to contradict the Draft MEIR statement “Land that may be developed in the future for parks and recreation uses, but not under the City’s jurisdiction, would not be considered a contribution towards meeting the Service Level Goal.”

Policy ERC 2.4.2: Waterway Recreation and Access. The City shall work with regional partners, State agencies, private land owners, and developers to manage, preserve, and enhance the Sacramento and American River Parkways and urban waterways and riparian corridors to increase public access for active and passive recreation.

For accuracy and clarity’s sake, in regards to this policy and The American River Parkway, the primary partner is Sacramento County, the manager and operator of the Parkway, and “to manage, preserve, and enhance” The American River Parkway means to comply with the American River Parkway Plan. The policy should be reworded to reflect same.

06-16

One example, out of many, of infill development, that will have immediate and significant effects on the American River Parkway, a non-city regional park, as it is built out over time, is the River District. Township 9, a project within the District is already well underway.

RIVER DISTRICT

The vision for the RIVER DISTRICT is that an eclectic mix of uses that will transcend an evolution from a primarily light-industrial, low-intensity commercial district, to that of a series of distinctive walkable neighborhoods within a district that is CONTINGUOUS TO THE AMERICAN RIVER (Capitals added) and serves as the northern gateway into the Central City. The walkable neighborhoods are arranged with a gridiron street pattern that serves as the extension of the Central City grid pattern.

The target growth for the 748 acre planning area is approximately 8,000 residential dwelling units, 780,000 square feet of commercial, 3.9 million square feet of office, 1.4 million square feet of light industrial and 3,000 HOTEL ROOMS (Capitals added), phased over a period of 20 years or more.

The River District lies at the confluence of two major California rivers, the mighty Sacramento River...and the American River which drains the west Sierras, forms the northern boundary and is one of America’s great wild and scenic rivers. Few warehouse districts has the luxury of two light rail lines connecting their district to aid in the development of a diverse mixed-use area...The District will soon have two LRT lines that will link the District to critical hubs in the region: The Sacramento International Airport; the regional rail center at the Sacramento Valley Station, and with direct lines to the exurbs of Sacramento County; and a future line to Yolo County to the west. Therefore the land use plan provides a mix of uses to form a series of complete neighborhoods but also incorporates uses that are DESTINATION CENTERS for office employment along Richards Boulevard as well as TOURIST HOTEL AND ENTERTAINMENT uses in the west end of the district. (Capitals added)

06-17

Sacramento’s riverfronts after long neglect are becoming a desirable asset for citizens. These waterfront edges are a KEY DEVELOPMENT AMENITY for the River District and an asset to which the land use plan and circulation plan SEEK TO EXPLOIT. (Capitals added) The Specific Plan sets a strong agenda for connecting pedestrians and cyclists to the water’s edge through a series of destination “moments” that are laid on roughly quarter-mile increments along the pathway called a

“Ribbon of Parks”. This ARMATURE OF ACTIVITY NODES (Capitals added) is designed to provide a ten minute walking interval along the river walk and provide alternating passive and activity nodes from Old Sacramento and the future Robert Matsui Park past the American River Bridge, a distance of three miles.... (River District Specific Plan, City of Sacramento, The Highlights, May 28, 2009)

06-17
cont.

While parks have been given placeholders on a proposed park and open space map for the River District, it is unknown at this time whether the 35.40 acres needed to meet 2.5 acres/1,000 residents has been secured. What is known is that all the residents, workforce and visitors will be enticed by and directed to the lower American River and Parkway to enjoy beautiful vistas, outdoor recreation opportunities such as boating, fishing, hiking, nature study, dog walking, biking, etc., and the City, to date, has not identified any mitigation measures to reduce or eliminate potentially significant impacts from an exponential increase in use.

Furthermore, the City and Regional Transit are in the process of planning a new vehicle, light rail, bike, pedestrian bridge that will remove close to 5 acres of parkland for which no mitigation for impacts has been identified.

06-18

The cumulative impacts from intense development in the River District, The Railyards, the Central Business District and elsewhere in the City and the new river crossing could very well destroy the “key development amenity” the City is building around if substantial and real mitigations are not identified now.

06-19

FUNDING

Goal ERC 2.5: Funding. Secure adequate and reliable funding for the acquisition, development, rehabilitation, programming, and maintenance of parks, community facilities, recreation facilities, trails, parkways, and open space areas.

Policy ERC 2.5.2: River Parkways. The City shall coordinate with Sacramento County and other agencies and organizations to secure funding to patrol, maintain, and enhance the American River and Sacramento River Parkways.

As clearly demonstrated the City intends to use The American River Parkway, a non-city regional park, as a means to maximize other recreational opportunities for current and future residents, workforce and visitors, especially in the Central City. No funding sources have been identified to mitigate the potentially significant impacts to the lower River’s and Parkway’s natural and recreation resources from “The City’s commitment to increasing densities in the Central City,” “. . . a key policy and development approach.”

06-20

As further evidence that NO FUNDING is identified and secured as the key mitigation measure for protecting the natural and recreation resources of The American River Parkway from the City’s intent to use the Parkway and other venues as a way to mitigate for its own

lack of adequate park space/recreational opportunities for current and future residents, workforce and visitors, the Draft MEIR states:

“The Central City is located in close proximity to a host of recreational amenities. The American River Parkway is noted in Policy 2.5.2, but it is just one of many resources. The Sacramento River, Old Sacramento Historic State Park, Sutter’s Fort, Capitol Park, and the short walk over the Tower Bridge to Raley’s Field are evidence of accessibility to additional recreational opportunities. The City’s vision of new economic and recreational activity in the downtown area is a reasonable basis for planning and commitment, and can be expected to provide opportunities for recreation that may differ from those in more suburban areas, but are meaningful nonetheless.

06-20
cont.

THRESHOLDS OF SIGNIFICANCE

The Draft MEIR has failed to demonstrate that the proposed General Plan’s impacts on parks and open spaces will not cause or accelerate a substantial deterioration of an existing area park and its recreational facilities and result in new facilities, the construction and operation of which could cause substantial adverse effects on the physical environment.”

06-21

MITIGATION MEASURES

The success of finding adequate funding for land acquisition, rehabilitation of existing facilities, programming and maintenance of the American River Parkway has proved impossible for the past 53 years. While impacts from increases in illegal camping, too few rangers, infill development and population growth continue to escalate, the general plan’s policies, goals and implementation measures relying on the HOPE of securing funding and other resources to mitigate the significant impacts to the American River Parkway is not enough to reduce these impacts to an insignificant level.

06-22

FURTHER COMMENTS

“Funding for acquisition of new park acreage, and generation of funds committed to maintenance and operation of parks and recreational facilities, are ongoing activities of the City. A combination of funding sources, including the Quimby Act, support these activities. THE FUNDING IS ADEQUATE ON AN ONGOING BASIS TO MAINTAIN THE EXISTING PARKS AND RECREATIONAL FACILITIES, AND THOSE THAT WOULD BE CONSTRUCTED IN THE FUTURE.” (Capitals added) Impacts and Mitigation Measures, 4.9-7

06-23

This statement regarding adequate funding on an ongoing basis is unsubstantiated and not borne out by current city practices. Is the referenced “adequate funding” based on the Service Level Goal of 5 acres/1,000 persons? On the existing level of service which is 3.4 acres/1,000 persons? Or on the proposed reductions in acreage/1,000 persons? What happens if Measure U, the ½ cent sales tax providing revenue, in part, to parks, expires in six years and is not renewed? Given the above

statement, at the very least there should be money for an updated Sutter’s Landing Park Master Plan and improvements to the Park. There is not. Why did the one comment letter received in response to the Notice of Preparation request the establishment of a funding mechanism for the full implementation of the city’s regional park in North Natomas if the above statement is true?

06-23
cont.

Why is it necessary to align the Service Level Goal with the existing park service level? One is a goal, 5 acres per thousand residents, and the other is the existing park service level, 3.4 acres per thousand residents throughout the City. A goal is that which you strive for because it represents the highest good. What is the new Service Level Goal?

06-24

The reduction in required park acreage per thousand persons appears to be driven by costs. Costs of building, operating and maintaining parks to the General Fund and costs to developers. Nowhere is there a discussion about how Sacramento residents use their parks, open space, and recreation facilities, and what is needed in the way of park acreage to meet those priorities.

06-25

There is no evidence to support the Draft MEIR’s assertion that the current Service Level Goal is discouraging infill. One only has to look to McKinley Village and the war waged by the developer to get the project approved for proof. The current Service Level Goal has not stopped Township 9 – the first residential units will be open for business within days - or planning for the River District, the Railyards, The Creamery, Tapestry Square, etc.

06-26

In closing, SARA believes, for all of the reasons above and more, that the Draft MEIR is inadequate and has not met the requirement to reduce impacts to the American River Parkway from proposed general plan policies, goals and implementation measures to a less than significant impact. In particular, we believe that by reducing the Level of Service Goal from 5 acres/1,000 persons to the proposed 1.75 acres in the Central City and to 3.5 acres outside the Central City, the City is increasing impacts to the American River Parkway significantly.

06-27

As always, Save the American River Association appreciates the opportunity to work with the City on issues affecting our lower American River Parkway.

Sincerely,



Stephen Green, President
Save the American River Association

“Almost miraculously, the American River remained an open green belt through the very heart of this spreading urbanization.” How the American River was ‘Saved,’ *Sunset Magazine*, October 1964

cc: SARA Board of Directors
Jeffrey R. Leatherman, Director, Regional Parks Department
Sacramento County Recreation and Park Commission
Donald Mooney, Attorney-at-Law

EDUCATION, RECREATION, AND CULTURE : Parks and Recreation

ERC 2

ERC 2.2.3 Service Level Goals. The City shall develop and maintain parks and recreational facilities in accordance with the goals in Table ERC 1. (MPSP/SO)

Table ERC 1 Parks, Community Facility, and Recreation Facility Service Level Goals	
Park Types	Acres per 1,000 Residents
Neighborhood Serving: Urban plazas, pocket parks and/or Neighborhood Parks	2.5 acres
Community Serving: Community Parks	2.5 acres
Citywide/Regionally Serving: Regional Parks, Parkways, and/or Open Space	8.0 acres
Linear Parks/Parkways and Trails/Bikeways	0.5 linear miles
Community Facilities	# of Units
Multi-Use Recreation Complexes (must include a building over 10,000 sq. ft.)	1 per 50,000 residents
Recreation Facilities	# of Units per Residents
Aquatic Facilities:	
Play Pool/Water Spray Feature	1 per 15,000
Outdoor Complex: Swimming and Wading Pool	1 per 30,000
Off Leash Dog Parks (Neighborhood/Community)	1 per 60,000
Picnic Areas (Large Group/Class I)	1 per 30,000
Playgrounds: Tot Lots, Adventure Play Areas	1 per 2,500
Skateboard Parks (Neighborhood/Community)	1 per 35,000
Community Gardens	1 per 50,000
Nature Interpretation Centers	2 total ^a
Fields	
Softball, including: Adult, Youth	1 per 7,500 (total)
Lighted	1 per 45,000
Baseball, including: Adult, Youth (Little League)	1 per 7,500 (total)
Lighted	1 per 45,000
Soccer, including: Bantam, Full Size	1 per 7,500 (total)
Lighted	1 per 30,000
Courts	
Volleyball	1 per 10,000
Basketball, including Youth, High School	1 per 5,000
Tennis	1 per 10,000

a. One north and one south of the American River.

<p>Letter 06 Response</p>	<p>Save the American River Association Steven Green, President 9-24-14</p>
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06-1 The comment recommends a change to LU 9.1.6 indicating that the American River Parkway Plan is not “state approved” but is “submitted to the legislature for adoption” and is, therefore, “state law.” This comment relates to specific policy text of the proposed 2035 General Plan. The General Plan policy, which is reflected on page 4.9.5 of the Draft MEIR, has been revised to read as follows:

LU 9.1.6 American River Parkway Plan. The City recognizes the American River Parkway Plan as an important ~~state approved~~ State land use and policy document prepared through the Urban American River Parkways Preservation Act (Public Resources Code 5840, et al). (RDR/MPSP)

This constitutes a minor clarification and does not affect the analysis or conclusions of the Draft MEIR. The comment does not raise issues related to the adequacy of the Draft MEIR. No further response is necessary.

06-2 The commenter summarizes the parks acreage and service level described in the Section 4.9 of the Draft MEIR. As described in Master Response 4.1.1, “Parks Service Level Master Response,” changes to the parkland service level standard are no longer proposed. Please refer to Master Response 4.1.1.

06-3 The commenter indicates that the Draft MEIR uses terms “persons,” “population,” and “residents” interchangeably when describing parkland service levels. “Population” and “residents” are able to be used interchangeably because they both refer to people living within the City of Sacramento. The only occurrence of the word “persons” in Section 4.9 is in the “Environmental Setting” summary. The following change to the Draft MEIR (p. 4.9-1) is made to clarify:

The City currently provides approximately 3.4 acres of neighborhood and community park per 1,000 ~~persons~~ residents citywide.

This revision is considered a minor clarification and does not change the analysis or conclusions of the Draft MEIR.

06-4 The commenter asks if the Draft MEIR accounts for demands from employees and visitors on neighborhood and community parks. As described in Master Response 4.1.1, “Parks Service Level Master Response,” changes to the parkland service level standard are no longer proposed. Please refer to Master Response 4.1.1. Also, Chapter 5 of this Final MEIR includes revisions to Draft MEIR Section 4.9, “Parks and Recreation,” resulting from the retention of the 2030 General Plan parkland service level standard. As identified in Master Response 4.1.1 and as can be seen in revised Draft MEIR Section 4.9, the modification to retain the 2030 General Plan parkland service level standard does not result in substantial changes to the analysis or conclusions of the Draft MEIR. Regarding demand and impact from employees and visitors on neighborhood and community parks, the City’s parkland service level goals are based on resident population numbers. There are many reasons for using population as a basis for parkland service level standards, but the primary reasons are these:

- ▲ City residents are the primary intended recipients of City park service for neighborhood and community parks; however, the Park Development Impact Fee, which is used for park

improvements, does take into account both residential and employee usage of parks via a Park Development Impact Fee Nexus Study. A Nexus Study is required per AB 1600.

- ▲ Almost all parks located within the city, and most parks within in the Central City, currently serve primarily residential uses (a few parks located downtown serve a higher volume of employees). For this reason, park use by employees and visitors is generally captured in a residence-based service level ratio. Because the proposed 2035 General Plan focuses much of the growth in the Central City area, the downtown parks that currently serve higher volumes of employees will begin to serve a higher residential population.
- ▲ Population numbers are fairly accurate, geographically focused, readily available, and frequently updated. Employee numbers are not as accurate and are much more unreliable. Visitor data is difficult to compile with any accuracy and would typically require expensive counts and visitor surveys.

The Draft MEIR Section 4.9 (as revised), therefore, does not explicitly identify the demand from employees and visitors, but, because these park users are generally captured in a residence-based park service ratio as well as the Park Development Impact Fee Nexus Study, the Draft MEIR's analysis is appropriate. No further response is necessary.

- 06-5 The comment raises issues with the proposed change to park service level standard as it relates to city and non-city regional parks. As described in Master Response 4.1.1, "Parks Service Level Master Response," changes to the parkland service level standard are no longer proposed. Please refer to Master Response 4.1.1.
- 06-6 The comment questions the validity of comparing the proposed park service level goals to those of other cities, calling the comparison "a meaningless exercise" if not "comparing apples to apples." As described in Master Response 4.1.1, "Parks Service Level Master Response," changes to the parkland service level standard are no longer proposed. Please refer to Master Response 4.1.1. Also, Chapter 5 of this Final MEIR includes revisions to Draft MEIR Section 4.9, "Parks and Recreation," resulting from the retention of the 2030 General Plan parkland service level standard. As identified in Master Response 4.1.1 and as can be seen in revised Draft MEIR Section 4.9, the modification to retain the 2030 General Plan parkland service level standard does not result in substantial changes to the analysis or conclusions of the Draft MEIR.
- 06-7 The comment raises issues with the proposed change to park service level standard as it relates to the American River Parkway. As described in Master Response 4.1.1, "Parks Service Level Master Response," changes to the parkland service level standard are no longer proposed. Please refer to Master Response 4.1.1.
- 06-8 The comment raises issues with increased use of the American River Parkway resulting from population and employment growth within the city. Please refer to Master Response 4.1.1. Also, please see response to comment 06-4 above, which discusses the City's use of a residence-based park service level standard for neighborhood and community parks. The city is not proposing a change to its regional park service goal. However, recognizing that the additional population growth within the city may place additional pressure on these regional trail facilities, proposed General Plan policy ERC 2.5.2 requires the City to coordinate with Sacramento County and other agencies and organizations to secure funding to patrol, maintain, and enhance the American River and Sacramento River Parkways.
- 06-9 The commenter asks whether the City will be relying on the American River Parkway to comply with proposed Policy LU 5.6.2. The policy does not currently consider the parkway. The City cannot, without appropriate agreements in place, apply its standards to facilities outside the City's jurisdiction and, therefore, cannot require the County to develop parks or open space uses

within the American River Parkway. This policy is concerned only with facilities within the City's jurisdiction.

- 06-10 The commenter requests identification of the parks and open spaces the City intends to develop in the future. To the extent details are available, park developments under the proposed 2035 General Plan are identified in Table 2-2 of the Draft MEIR. Draft MEIR Exhibit 2-4, "Land Use and Urban Form Diagram," identifies all of the land in the city designated "Parks and Recreation" and "Open Space." No further response is necessary.
- The commenter also asks if Policy ERC 2.2.6 includes the American River Parkway as a "regional park." The policy does not currently consider the parkway, except the portions located within the City's jurisdiction. See response to comment 06-9 above.
- 06-11 The commenter suggests an inconsistency. See response to comment 06-10 above. The answer to the commenter's previous question was that the policy does not consider the parkway. Therefore, no inconsistency exists.
- 06-12 The commenter requests specific information regarding land along the American River that the City is considering for acquisition and development of parks and public access. To the extent details are available, park developments under the proposed 2035 General Plan are identified in Table 2-2 of the Draft MEIR. Draft MEIR Exhibit 2-4, "Land Use and Urban Form Diagram," identifies all of the land in the city designated "Parks and Recreation" and "Open Space." In addition, Figure CC-2 in the Central City Community Plan (within Part 3 of the 2035 General Plan) also identifies the land designated for "Parks" and "Open Space" in the Central City Community Plan, including land along the American River. These land use designations are consistent with the acquisition assumptions which provided basis for the park service level standards. No further response is necessary.
- 06-13 The commenter asks if the reference to "along the rivers" in Policy ERC 2.2.11 includes the American River Parkway. The policy does not consider the parkway (except for the City-owned portions discussed above in response to comment 06-10). The City cannot provide regional parks by using an existing parkway outside of its jurisdiction. See responses to 06-9 and 06-10 above. No further response is necessary.
- 06-14 The commenter asks if the reference to "Rivers" and "Natural Resource Areas" in Goal ERC 2.4 includes the American River Parkway. This policy does include the American River Parkway and seeks partnership and coordination with other applicable agencies, including Sacramento County, to maximize the availability and use of these facilities by City residents. However, the portions of the parkway outside the City's ownership and jurisdiction do not contribute to achievement of the City's specified service goals. The City cannot provide these facilities by using an existing parkway outside of its jurisdiction. See responses to 06-9 and 06-10 above. No further response is necessary.
- 06-15 The commenter asks if the City's linear parks/parkways service level in Policy ERC 2.4.1 includes the American River Parkway. The policy does not consider the parkway (except for the City-owned portions discussed above in response to comment 06-10). The City cannot provide regional parks by using an existing parkway outside of its jurisdiction. See responses to 06-9 and 06-10 above. No further response is necessary.
- 06-16 The commenter requests clarification of Policy ERC 2.4.2 to identify Sacramento County specifically and to indicate compliance with the American River Parkway Plan. This policy is intended to broadly identify regional, State, and local partners, owners, and developers regarding management, preservation, and enhancement of parkways, urban waterways, and riparian corridors. This level of specificity is not appropriate for this policy. The Background Report (included as Appendix C of the Draft MEIR—see p. 2-72) describes the American River Parkway

Plan. The Background Report also indicates that the property is maintained by Sacramento County Regional Parks (See Background Report p. 5-25). Policy ERC 2.5.2 River Parkways specifically calls out Sacramento County as a partner agency. No changes to Policy ERC 2.4.2 are necessary. This comment does not raise environmental issues or issues with the adequacy of the Draft MEIR. No further response is required.

- 06-17 The commenter describes approved development within the River District and indicates that it is unknown whether the River District parkland has been secured. For the most part, parkland within the River District has not been secured. Parkland is mostly intended to be dedicated with development. However, some parks within Township 9 have been dedicated. In addition, the River District Specific Plan identifies parkland dedication and in-lieu fees for this designated area (See p. 59 of the Specific Plan available online at the following URL: <http://portal.cityofsacramento.org/Community-Development/Planning/Long-Range/Specific%20Plans>). Once the General Plan is adopted the River District Specific Plan will be amended to be consistent with the General Plan policies. The commenter then indicates that the City has not identified any mitigation measures to reduce the potentially significant impacts resulting from an “exponential increase” in use. It is not clear whether the commenter is suggesting that mitigation is needed to compensate for any currently identified park acreage in the River District that is not acquired, or whether the commenter is suggesting impacts related to population growth in general and increased pressure on parks. As described in Master Response 4.1.1, “Parks Service Level Master Response,” changes to the parkland service level standard are no longer proposed. Also, Chapter 5 of this Final MEIR includes revisions to Draft MEIR Section 4.9, “Parks and Recreation,” resulting from the retention of the 2030 General Plan parkland service level standard. Impacts to parks resulting from growth under the proposed 2035 General Plan are identified in revised Section 4.9 of the Draft MEIR. Please refer to revised Section 4.9 included in Chapter 5 of this Final MEIR.
- 06-18 The commenter indicates that the proposed vehicle, light rail, bike, and pedestrian bridge would remove nearly five acres of parkland and that no mitigation for impacts has been identified. The commenter does not identify which river crossing would remove five acres of parkland, or which park might be affected. None of the river crossing projects identified in the General Plan would result in the loss of five acres of parkland (although some of the crossings would pass over parkland). Therefore, the Draft MEIR did not include mitigation for loss of this parkland. Also, as identified in the Draft MEIR (p. 6-14) specific plans are not available for detailed evaluation of the proposed bridge crossings. At the time specific bridge plans are developed additional CEQA review and evaluation will be necessary. Although impacts to parks are not anticipated at this time, the CEQA documents for the individual river crossing projects will evaluate these impacts and will identify any necessary mitigation measures. No further response is necessary.
- 06-19 The commenter indicates that development in the Railyards, the Central Business District, and elsewhere in the City, along with new river crossings, could substantially impact the rivers if mitigation is not identified. The commenter does not identify specific issues with the Draft MEIR. The Draft MEIR’s analysis is cumulative in nature and identifies potential cumulative impacts associated with all of the developments described by the commenter. Because no specific issues with the Draft MEIR are identified, no further response can be provided.
- 06-20 The commenter indicates that no funding sources are identified to reduce impacts resulting from the city’s increased use of the American River Parkway. Please refer to response to comment 06-8 regarding increased use of the American River Parkway.
- 06-21 The commenter indicates generally that the Draft MEIR did not adequately demonstrate that the proposed General Plan’s impacts on parks would remain below the identified thresholds of significance. Section 4.9 of the Draft MEIR, as revised in Chapter 5 of this Final MEIR, explicitly describes how the proposed 2035 General Plan would not exceed the identified thresholds of significance. In response to public comments, Master Response 4.1.1 provides additional

clarification. Because the commenter offers no specifics regarding the Draft MEIR's purported "failure to demonstrate," no additional response can be provided.

- 06-22 The commenter indicates that the hope of securing funding is not enough to mitigate significant impacts to the American River Parkway. The Draft MEIR did not identify a significant impact to the American River Parkway resulting from implementation of the proposed 2035 General Plan; therefore, additional mitigation is not necessary. Regarding funding issues please refer to response to comment 06-20 above. No further response is necessary.
- 06-23 The commenter raises issues related to the City's ability to fund maintenance of existing parks and for planning and development of future parks given the previously proposed change in the parkland service level standard. As described in Master Response 4.1.1, "Parks Service Level Master Response," changes to the parkland service level standard are no longer proposed. Please refer to Master Response 4.1.1.
- 06-24 The commenter questions the City's establishment of a goal that is consistent with existing park service level. As described in Master Response 4.1.1, "Parks Service Level Master Response," changes to the parkland service level standard are no longer proposed. Please refer to Master Response 4.1.1.
- 06-25 The commenter questions the City's motives for the proposed reduction in park service level standards. As described in Master Response 4.1.1, "Parks Service Level Master Response," changes to the parkland service level standard are no longer proposed. Please refer to Master Response 4.1.1.
- 06-26 The commenter indicates that the Draft MEIR does not present evidence supporting the statement that the City's current service level goal discourages infill. As described in Master Response 4.1.1, "Parks Service Level Master Response," changes to the parkland service level standard are no longer proposed. Please refer to Master Response 4.1.1. Also, Chapter 5 of this Final MEIR includes revisions to Draft MEIR Section 4.9, "Parks and Recreation," resulting from the retention of the 2030 General Plan parkland service level standard. As identified in Master Response 4.1.1 and as can be seen in revised Draft MEIR Section 4.9, the modification to retain the 2030 General Plan parkland service level standard does not result in substantial changes to the analysis or conclusions of the Draft MEIR.
- 06-27 The commenter indicates generally that the Draft MEIR is inadequate and does not reduce impacts to the American River Parkway, especially in light of the previously proposed change in parkland service level goals. As described in Master Response 4.1.1, "Parks Service Level Master Response," changes to the parkland service level standard are no longer proposed. Please refer to Master Response 4.1.1. Responses to comments 06-8 and 06-20 provide additional discussion regarding the American River Parkway. No further response is necessary.

Letter
07



The Capital City Preservation Trust

September 25, 2014

Scott Johnson, Associate Planner
City of Sacramento, Community Development Department
Environmental Planning Services
300 Richards Boulevard, Third Floor
Sacramento, CA 95811
SRJohnson@cityofsacramento.org

Re: General Plan Dwelling Unit Density Policies for Historic Properties

Dear Mr. Johnson:

The 2035 General Plan Update calls for amending current restrictions on number of dwelling units per acre in the Central City. In the Central City, some parcels with a General Plan designation of Traditional Neighborhood Medium Density (TNMD) are also zoned R3A. The maximum density for TNMD is 21 dwelling units per acre (du/na), while the R3A zone allows up to 36 du/na. The lower density in the existing General Plan was a compromise with preservation interests who feared the higher R3A zone density would foster demolition by neglect in historic districts and for landmark properties. City staff claim that this discrepancy between the General Plan TNMD density and the R3A zoning density creates problems and confusion for implementing development applications.

07-1

In the past, staff has relied on Land Use policy 4.3.2, which allows staff to consider the average block density, to work around this problem. However, that policy is written in a way that is cumbersome and creates a lot of uncertainty for landowners. It has also had the unintended consequence of allowing densities beyond the 36 du/na in situations where multiple vacant lots exist on a block. The City proposes to fix this discrepancy and encourage infill development by having the draft 2035 General Plan propose the maximum density in the TNMD designation to be adjusted from 21 to 36 dwelling units per acre. City staff claim that this change will recognize both the existing density range of up to 36 dwelling units per net acre allowed in the R3A zone as well as the broader range of densities that exist in traditional medium density areas.

07-2

However, while this eases a problem for one group, it raises a very difficult problem for historic preservation efforts in the area. The problem of demolition by neglect has not gone away. The Hart-Amoruso House at 22nd and H Streets is a prime example. The City proposes no

compensating fixes to address this problem while giving developers the higher density that they want.

Minimum maintenance requirements in the City Code are not sufficiently enforceable to prevent property owners from letting their historic properties rot away. We need a solution, such as removing the R3A zone designation on landmark-identified properties and contributory properties to historic districts. Leave the General Plan density requirement for TNMD at 21 units per acre for these properties.

This is an extremely important issue to preservation groups in Sacramento. We do not want to wait to see if our proposed solution is addressed in the final General Plan. If you can let us know that this solution (really, a compromise) will be included in the GP, we can forego a meeting. However, if we are not given some assurance, we request a meeting to discuss this issue. You can contact me at 916-447-8002 or care of Kay Kneprath, 2620 P. Street Sacramento CA 95816. We hope that city staff agrees that our proposal is reasonable and worth inclusion.

Very truly yours,

Kathryn J. Tobias, MRP, JD.
Chair, Capital City Preservation Trust

cc. William Berg, President, SOCA
Members of the City of Sacramento Preservation Commission
City of Sacramento Preservation Director Roberta Deering
Thomas S. Pace, Principal Planner, City of Sacramento

07-2
cont.

07-3

<p>Letter 07 Response</p>	<p>Capital City Preservation Trust Kathryn Tobias, MRP, JD., Chair 9-25-14</p>
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07-1 The comment raises issues related to the proposed amendment to allow an increase in density in the Traditional Neighborhood Medium Density (TNMD) designation from 21 dwelling units per acre (du/ac) to 36 du/ac to bring the General Plan designation's allowed density into consistency with the current R3A zone. The commenter suggests that the higher density would foster "demolition by neglect" in historic districts and for landmark properties. The term "demolition by neglect" refers to the deferral of structure maintenance to encourage disrepair and eventual condemnation and removal of the structure for public health and safety reasons. It is suggested that owners of historic properties use this strategy to circumvent the City's demolition permit process involving listed historic structures, which requires review and approval by the Preservation Commission.

City staff are aware that, over the past decades, several older and historic structures have been neglected by their owners to the point where condemnation was necessary for safety reasons. However, it is speculative to assume the reasons for deterioration of property condition or motives of property owners regarding property upkeep. If an owner intentionally neglects a property, it would be in violation of the City's Planning & Development Code and Health and Safety Code (described in more detail below) and subject to penalty.

The City applies General Plan land use designations at the neighborhood level. The City's approach for the proposed 2035 General Plan (and the currently adopted 2030 General Plan) promotes higher density infill development within the Central City to encourage community vibrancy, connectivity, sustainability, and reduced vehicle miles traveled (VMT). There is no evidence to indicate that a change in the General Plan residential density designation would result in intentional neglect of properties, particularly when the intent of the change is for enhancement of community qualities.

Although the issue of intentional "demolition by neglect" is speculative, a number of historic, potentially historic, and just older properties are in disrepair in Sacramento. This condition does diminish the historic fabric and character of the City around a deteriorated property, including within historic districts and older neighborhoods. The General Plan contains policies to address the maintenance of historic structures, including the following:

- ▲ **Policy HCR 2.1.4: Incentives and Enforcement.** The City shall develop and support regulatory (e.g., appropriate development and zoning standards), technical, and financial incentives (e.g., City, State, and federal, and private grants, loans, easements, and tax credits) and enforcement programs to promote the maintenance, rehabilitation, preservation and interpretation of the city's historic and cultural resources.
- ▲ **Policy HCR 2.1.7: Historic Resource Property Maintenance.** The City shall encourage maintenance and upkeep of historic resources to avoid the need for major rehabilitation and to reduce the risks of demolition, loss through fire or neglect, or impacts from natural disasters.
- ▲ **Policy HCR 2.1.9: City-Owned Resources.** The City shall maintain all City-owned historic and cultural resources in a manner that is consistent with the U.S. Secretary of the Interior's Standards for the Treatment of Historic Properties.

- ▲ **Policy HCR 2.1.12:** Contextual Features. The City shall promote the preservation, rehabilitation, restoration, and/or reconstruction, as appropriate, of contextual features (e.g., structures, landscapes, street lamps, signs) related to historic resources.

Implementation of these policies help address disrepair of historic properties and helps maintain the appropriate historic fabric and contexts of the City's older neighborhoods. Because these policies promote sound maintenance, their implementation also reduces the likelihood that these structures would be demolished for public health and safety reasons.

The proposed 2035 General Plan also includes policies that specifically discourage demolition of historic structures and promote reuse of structures, including the following:

- ▲ **Policy HCR 2.1.15:** Demolition. The City shall consider demolition of historic resources as a last resort, to be permitted only if the rehabilitation of the resource is not feasible, demolition is necessary to protect the health, safety, and welfare of its residents, or the public benefits outweigh the loss of the historic resource.
- ▲ **Policy LU 2.6.5:** Existing Structure Reuse. The City shall encourage the retention of existing structures and promote their adaptive reuse and renovation with green building technologies to retain the structures' embodied energy, increase energy efficiency, make it more energy efficient, and limit the generation of waste.

Implementation of the policies described above would discourage inadequate maintenance of historic structures, including "demolition by neglect."

As mentioned above, it is illegal for owners of any property, including historic structures, to intentionally neglect their property. City Code Title 8, "Health and Safety," prohibits nuisance properties and requires appropriate maintenance or building exteriors and interiors for the purposes of public welfare. Because "demolition by neglect" is illegal, it is not considered a reasonably foreseeable outcome of the proposed 2035 General Plan.

Impact 4.4-1 of the Draft MEIR (p. 4.4-5) concludes that proposed General Plan policies and environmental review processes would not prevent the demolition of historic properties and that the impact is considered significant and unavoidable. The MEIR's analysis and conclusion discloses a potential for significant and unavoidable impact to historic structures despite the proposed General Plan policies; therefore, good faith full disclosure of the potential impact has occurred, consistent with CEQA requirements.

The City welcomes further dialogue with the Capital City Preservation Trust regarding ways to further promote sound maintenance and protect historic properties. No further response is necessary.

07-2 See response to comment 07-1 above.

07-3 See response to comment 07-1 above.

Letter
08

GENERAL PLAN UPDATE

A Joint Letter From Community Groups and Individuals

September 25, 2014

Scott Johnson, Associate Planner ((916) 808-5842)
City of Sacramento, Community Development Department
Environmental Planning Services
300 Richards Boulevard, Third Floor
Sacramento, CA 95811 sent by email to SRJohnson@cityofsacramento.org

Re: Comments on General Plan Update Master Environmental Impact Report

Dear Mr. Johnson:

The General Plan Update includes major changes in City policies that relate to population growth and which may have significant impacts on the environment. The 2035 General Plan Master Environmental Impact Report (“MEIR”) compares the impact of the build-out of the amended General Plan to today’s environment. The General Plan assumes a population of 640,000 in 20 years compared with today’s population of 475,000, a growth of 35 percent (1.7 percent annually).

We respectfully submit the following comments on the MEIR. First, we propose changes to further the City’s urban forest goals and expand accountability for trees and tree canopy. Second, we submit that the proposed General Plan reduction to park acreage levels may not be in the City’s best interests as it may cause reduction in quality of life, discourage new residents from moving in, reduce the presence of publicly protected trees per capita, and reduce one of the City’s primary funding sources for park acquisition and development.

08-1

Urban Forest

The General Plan draft in the Environmental Resources section has goals and policies related to the City’s urban forest. It appears many, if not all, of those goals and policies are the same as the 2009 General Plan provisions. We suggest that the following items be considered as policies to further ER Goal 3.1, which states: “Urban Forest. Manage the city’s urban forest as an environmental, economic, and aesthetic resource to improve Sacramento residents’ quality of life.” These policies were crafted based on our research and review of provisions that other communities have relating to trees and we believe these policies will help further the City’s ER Goal 3.1.

08-2

- The City shall protect not only all public trees but also all public tree-planting spaces.
- The City shall increase urban forestry resources to support preservation of tree canopy beyond public trees.

- The City shall monitor and report on the City’s inventory of all trees, including public trees, other protected trees, and the tree canopy in the City.
 - Implementation programs:
 - Incorporate tree canopy into the City’s Geographic Information system (GIS);
 - Report every five years on tree canopy and public trees for each City community plan area; and
 - Report annually on permitted tree removals and tree removal mitigation for each City community plan area.
- The City shall implement and require a hierarchy of mitigation measures based on the full value of the tree when tree removal cannot be avoided.¹
- The City shall implement standards related to replacement of trees (e.g., based on diameter of removed tree, comparable shade levels, etc.), including replacement in the area where the tree has been removed, where feasible, and preferred use of native species.²
- The City shall require trees and green space for new developments based on an established green area ratio.³ Setbacks and planter strips shall be adequate to provide for maturation of large canopy street trees (adequate space above and below ground level).
- The City shall require new developments on lots with existing tree canopy to preserve a certain percentage (e.g., 40%) of the aggregate diameter inches of all structurally sound mature trees on the property.⁴ Tree corridors and tree groupings required in prior project approvals shall be respected in redesign of a property. Mitigation trees shall not be permitted for removal.

08-2
cont.

In addition to the above, for ER 3.1.3 “Trees of Significance,” we suggest expanding the current meaning of the term “heritage trees” to encompass canopy trees and other structurally sound mature trees. “Heritage trees,” as defined by the City’s ordinance, includes only a small portion of the trees in the City.

08-3

Tree canopies play a significant role in the health and well-being of City residents and provide other services such as reducing energy costs and other urban heat island impacts, reduction of street maintenance costs, and bio-retainment of storm water.⁵ Canopy coverage is

¹ See e.g., Elk Grove (CA) Mun. Code § 19.12.11, Palo Alto (CA), Fort Thomas (KY), Pasco County (FL),

² See e.g., Napa (CA) Mun. Code § 12.45.070, Miami (FL), Wilsonville (OR) and Washington D.C.

³ See e.g., the D.C. Sustainable Plan, p. 76 available at:

http://sustainable.dc.gov/sites/default/files/dc/sites/sustainable/page_content/attachments/DCS-008%20Report%20508.3j.pdf, El Paso (TX), Henry County (GA), and Portland (OR).

⁴ See e.g., Charlotte (NC), City of O’Fallon (MO), Fort Thomas (KY), Prince George’s County (MD), and Southlake (TX).

⁵ See Cindy Blain, “Viewpoints: More trees, better health,” the Sacramento Bee (Aug. 17, 2014); Nowak, David J., Hirabayashi, Satoshi, Bodine, Allison, and Greenfield, Eric, “Tree and forest effects on air quality and human health in the United States,” Environmental Pollution, 193:119-129 (2014). See also Laber-Warren, Emily, “Money Growing on Trees,” NewsWeek (May 1, 2014), available at:

<http://www.newsweek.com/2014/05/09/money-growing-trees-249162.html>; Kathleen L. Wolf, “City Trees and Property Values,” Journal of Facility Management OnLine, September/October, 2008.; Vibrant Cities & Urban

generally defined as the area of ground covered by the shadow of tree foliage.⁶ Canopy coverage includes the entire urban forest canopy within a zone, including public and private properties.

We believe that the MEIR may not adequately evaluate the impacts of the proposed General Plan Update on the tree canopy and its benefit to City residents. Attached to this letter are some of the many available sources that document the health and other benefits of trees and tree canopy for urban residents.⁷

In the City, the continuity between the American River Parkway and the tree canopy in nearby neighborhoods is a key element sustaining wildlife and expanding the benefits of the parkway corridor into the City. The balance that the City and the County of Sacramento have achieved between nature and urban life has a positive impact on residents and accounts for much of the present attractiveness of living in Sacramento. The General Plan Update should consider how to maintain this attractive balance and recognize the need to protect not only the Parkway, but also the complementary natural elements in bordering neighborhoods such as the Central City, South Natomas, Woodlake, East Sacramento, and others.

We believe that future development in the City may (and likely will) cause the net removal of trees within the City limits. Trees planted as replacements are not likely to fully mitigate for the losses of trees removed, especially where seedlings or trees with smaller canopies are used to replace existing mature trees with larger canopies. We believe that the MEIR does not fully account for this difference. (See attached photo for illustration.)

In addition, the proposed General Plan only requires retention of “City Trees” and “Heritage Trees” and tree replacement or remediation for those types of trees in the event that they cannot be retained. Thus, the General Plan does not appear to provide mitigation measures for the losses of trees and tree canopy outside of the City Trees and Heritage Trees categories. We believe that the potential losses of mature trees that do not fall into the categories identified for mitigation may not be accounted for in the MEIR where it determined that the losses of trees will be less than significant. With these considerations in mind, please clarify the basis for the MEIR conclusion that Impact 4.3-10 (Substantial reduction in the number of trees within the Policy Area) will be less than significant.

We ask that the City ensure that the MEIR quantifies the losses of trees and tree canopy that may result from the implementation of the General Plan, estimate the health and other impacts on the public of net losses of mature trees and tree canopies, and include mitigation measures that adequately address these impacts.

08-3
cont.

08-4

08-5

08-6

Forests: A National Call to Action, New York Restoration Project (2011) p. 14. USDA Pacific Southwest Research Station General Technical Report (GTR) -228 *Northern California Coast Community Tree Guide Benefits, Costs, and Strategic Planning (April 2010)* E Gregory McPherson, James R. Simpson, Paula J. Peper, Aaron M.N. Crowell and Qingfu Xias.

⁶ Dr. Robert Tate, Sacramento Tree Services Best Management Practices Report, November 2003.

⁷ See also Trust for Public Land, “Measuring the Economic Value of a City Park System,” 2009.

Provision of Parks for City Residents

We believe that the proposed amendment to the City’s General Plan to reduce park acreage to 3.5 acres for each 1,000 residents outside of the Central City and 1.75 acres for each 1,000 residents within the Central City is not in the best interests of the City or its residents. A staff report provided to the Parks and Recreation Commission for its September 4, 2014 meeting demonstrated that reducing park acreage from 5 acres for each 1,000 residents to 3.5 acres for each 1,000 residents would significantly reduce the Quimby in-lieu fees the City receives from new developments. Reducing the General Plan’s park acreage will result in significant reductions to the Quimby funding source by as much as 30 to 65 percent (as estimated by City staff).

08-7

We also believe that reducing park acreage for each 1000 residents may conflict with many of the General Plan’s goals and policies and could detract from attracting new City residents, especially in the Central City. For example, Land Use Policy 8.1.3 states that the City shall “proactively seek to acquire land throughout the city to provide for adequate parks and public facilities, particularly in infill areas where available land is scarce.” Also, Education, Recreation, and Culture (“ERC”) Goal 2.5 states that the City shall secure “adequate and reliable funding for the acquisition, development, rehabilitation, programming, and maintenance of parks, community facilities, recreation facilities, trails, parkways, and open space areas.” Based on the Parks and Recreation Commission’s report (discussed above), reducing Quimby in-lieu fees appears to hinder ERC Goal 2.5 and Land Use Policy 8.1.3.

08-8

Parks provide land for the City’s tree canopy, and tree canopies are beneficial to City residents, not only for aesthetic reasons, but also for the health reasons discussed above. Trees in City parks are protected by ordinance whereas trees on private property generally are not. Reducing the expected parkland in the City may reduce the tree canopy at build-out. We believe that the MEIR does not address this impact.

08-9

Reducing the park requirement for new development, as development within the City increases, may increase usage in existing parks, thus reducing the park benefits proportionately to City residents. Additional population pressure will be placed on regional parks with natural area components (as examples Sutter Landing Park and other American River Parkway areas), with a resulting potential for reduction in natural areas within regional parks in order to provide for the active neighborhood park facilities that will be missing because of reduced Quimby in-lieu fees. We believe that these are negative impacts not disclosed nor accounted for in the MEIR.

08-10

Consistent with the above, we suggest that the City retain a park standard of 5 acres for each 1,000 residents to avoid the impacts of the lower park acreage standard on future recreation and open space for City residents and on the urban forest, including all neighborhood and regional parks.

Thank you for your consideration of the above concerns raised in our letter. Please provide written notice of the availability of the Final MEIR and all related documents, including your response to these comments, to the undersigned at trees4sacto@sbcglobal.net.

Sincerely,



Laurie Litman, 350 Sacramento



Caroline Goddard
President
East Sacramento Partnerships
For a Livable City

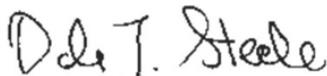


PRESIDENT EAST SACRAMENTO PRESERVATION
NEIGHBORHOOD ASSOCIATION

Michael Saeltzer, East Sacramento Preservation Neighborhood Association



Rick Guerrero, Pres. ECOS
Environmental Council of Sacramento



Dale Steele
Friends of the River Banks

A JOINT LETTER FROM COMMUNITY GROUPS AND INDIVIDUALS



Jude Lamare, President, Friends of the Swainson's Hawk



Sean Ward, Friends of Sutter Landing



Sean Wirth, Co-Chair, Habitat 2020

Marshall School/New Era Park Neighborhood Association



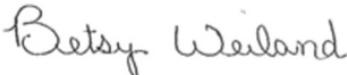
Co-Chair



Matthew Piner, Midtown Neighborhood Association



John Hagar, President, Newton Booth Neighborhood Association



Betsy Weiland, Save the American River Association

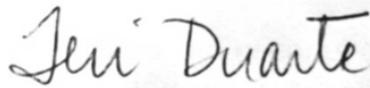
A JOINT LETTER FROM COMMUNITY GROUPS AND INDIVIDUALS



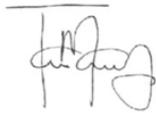
Sierra Club Sacramento



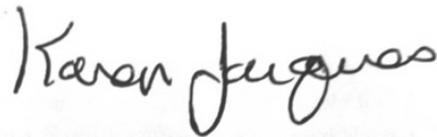
Luree Stetson, Upper Land Park Neighbors



Teri Duarte MPH, Executive Director, Walk Sacramento



Jane MacCauley, Woodlake Neighbors Creating Transparency



Karen Jacques



Martin Palomar

A JOINT LETTER FROM COMMUNITY GROUPS AND INDIVIDUALS



Will Green



James P. Pachl



Melinda Dorin Bradbury

A JOINT LETTER FROM COMMUNITY GROUPS AND INDIVIDUALS



Example of replacement tree that does not include substantial canopy.



CITY OF SACRAMENTO

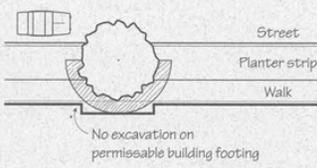
Developer Guidelines for City Street Trees

The City of Sacramento, Tree Services, recommends that developers adhere to the following guidelines in order to preserve and continue Sacramento's proud heritage of large shade trees throughout the downtown area.

SOIL AREA

Mature city street trees and newly planted street trees need adequate soil area for the preservation and development of a strong root system. City Tree Services recommends that no significant excavation occur within 10 feet of the face of the sidewalk adjacent to any existing street tree or adjacent to any designated planting location. "Significant" excavation is defined as more than 12 inches.

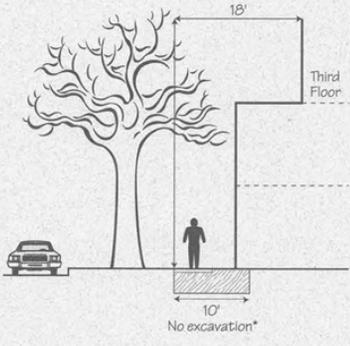
- Soil area is necessary for tree support to prevent blowing over.
- Soil area is necessary for roots to acquire necessary water and nutrients.



AIR SPACE

Street trees also require air space to enable the tree to develop a significant crown. Tree Services recommends that construction above the second story level be set back a minimum of 18 feet behind the face of the sidewalk adjacent to any existing street tree or adjacent to any designated street tree planting location.

- Air space is necessary for trees to have strength and balance. A tree with a 6-foot width on building side and a 25-foot width on the street side is both awkward in appearance and in danger of blowing over.
- Air space is necessary if a tree is to receive sunlight and air to synthesize its food requirements and to provide the public with cooling shade, air purification, and beauty.



*This is the minimum requirement. More area may be required for mature trees.



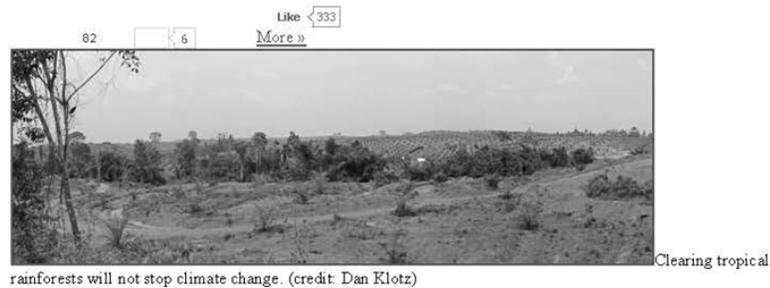
CITY OF SACRAMENTO
DEPARTMENT OF PARKS AND RECREATION

CITY OF SACRAMENTO
 Department of Parks and Recreation, Tree Services Division
 5730 24th Street, Building 12A
 Sacramento, CA 95822
 (916) 433-6345
<http://www.cityofsacramento.org/parks/trees/>



You Cannot Save the Climate Without Trees – News Watch

Page 4 of 8



The People's Climate March that trumpeted its way through the streets of Manhattan yesterday was led by communities on the front lines of climate change—and Indigenous Peoples were at the forefront of this group. The tropical forests where they live are not only getting hammered by [changing weather patterns](#), [drug traffickers](#), [invasive pests](#), and [massive fires](#), but these woodlands are also being cleared at an alarming rate, making way for [cropland](#), [pastureland](#), [strip mines](#), and other ventures that extract natural resources from the Earth.

The United Nations Food and Agriculture Organization rang the alarm bell on the world's forests in April of this year. Working off of its own data as well as the most recent reports from the Intergovernmental Panel on Climate Change—a group of 2,000 scientists from around the world—the FAO declared that [13 million hectares of tropical forests are now cleared every year](#), an area larger than half the countries in the world. The process of this "conversion" releases an estimated 4 billion tons of carbon dioxide annually, almost twice the amount produced by urban transportation (cars, trucks, buses, et. al.) throughout the world.

The reason deforestation releases so much carbon dioxide is that trees store an incredible amount of carbon in their trunks, roots, and limbs. The FAO also estimated that the world's forests remove approximately two billion tons of carbon dioxide from the atmosphere every year.

One of the questions often raised by those seeking to clear out the forests is whether chopping away the old growth and planting young trees helps the planet. In the past, the rapid growth of young trees was thought to absorb more carbon than the slower growth of stately larger trees, or even the oldest found in old growth forests.

But that question was laid to rest in a thorough literature review from scientists at the US Geological Survey. [In looking at 403 tropical and temperate tree species](#), the researchers found that "...large, old trees do not act simply as senescent carbon reservoirs but actively fix large amounts of carbon compared to smaller trees; at the extreme, a single big tree can add the same amount of carbon to the forest within a year as is contained in an entire mid-sized tree."

So forests are valuable to nature, storing billions of tons of carbon at a point in time where [the amount of carbon that human beings produce](#) is radically changing our planet's atmosphere. Forests are also valuable, obviously, [to the people whose lives and livelihoods depend on the forests](#) remaining upright and living. We should do more to conserve the forests that remain, right?

Wrong, according to a researcher from the Yale School of Forestry and Environmental Studies.

In [a controversial opinion piece](#) that ran in the New York Times, the Yale professor presented a new argument for chopping down trees. The massive amounts of forest loss since the mid nineteenth century have supposedly cooled the planet by reducing the biogenic volatile organic compounds (BVOCs) released by forests, compounds

<http://newswatch.nationalgeographic.com/2014/09/22/cannot-save-climate-without-trees/> 9/24/2014

Viewpoints: More trees, better health

By Cindy Blain

Special to The Bee

Published: Sunday, Aug. 17, 2014 - 12:00 am

When the temperature heads into the triple digits here in the Sacramento Valley, people walk on the shady side of the street and park their cars under trees whenever possible. They know trees make life more comfortable, but do they know trees help make them healthier?

Research connecting trees and human health was almost nonexistent before 2000 and has increased dramatically since – and the findings are remarkable.

At the Sacramento Tree Foundation, we have gathered a growing body of evidence on how trees significantly impact our health and well-being. Trees provide such a complex symphony of health benefits that it is sometimes hard to isolate the various ways they help make us healthier. All this is in addition to providing the oxygen necessary for life on this planet – which we take for granted with every breath.

Here are just four ways that trees are making our lives better beyond providing cooling shade:

- Trees directly affect our health by reducing blood pressure and stress levels.

“If you have chronic stress, you are at risk of getting sick more often, for staying sick longer, and for dying sooner than your colleague who doesn’t have as much stress as you do,” Bill Sullivan, a University of Illinois professor, said at a Sacramento Tree Foundation conference on health and trees this year.

Taking a different tack to reach the same conclusion, research by Geoff Donovan of the U.S. Forest Service reveals a significant increase in cardiovascular disease in communities that lost large tracts of urban forest due to climate change and emerald ash borer infestation.

- Trees filter and capture air pollution from cars.

Evergreen, needle-leaf trees are most effective as natural air filters near high-traffic roadways.

Several studies have shown that ultrafine particulate matter is especially dangerous for our health as these particles are so small that they penetrate human tissues.

- Trees increase the walkability of neighborhoods.

Living in a neighborhood with more trees has been tied to higher physical activity levels.

Regular walking and biking have many health benefits such as reduced obesity, diabetes and cardiovascular disease.

- Trees and green spaces bring people together to chat and play, leading to stronger social ties. Trees have long been associated with gathering spaces as they provide outdoor “architecture” as well as shade, natural air conditioning and aesthetic appeal. Stronger social ties are also linked to reduced stress, increased well-being and longer life.

Some of these findings were recently echoed in a study launched by the Sacramento Tree Foundation. The goal of our Green Prescription study was to see if there are correlations between neighborhood tree canopy cover and a variety of health outcomes for urban residents in our

region. The study used health data provided by UCLA's California Health Interview Survey, the largest state health survey in the nation, reaching 50,000 Californians every two years. Using regression models, the preliminary results of the study show that there are positive relationships between trees and physical and mental health. Specifically, the greater the tree canopy, the more physical activity, better social cohesion and less adult obesity and asthma in a community.

A fascinating part of the Green Prescription study used statistical modeling to extrapolate the expected health outcomes of adults in two hypothetical neighborhoods with differing amounts of trees.

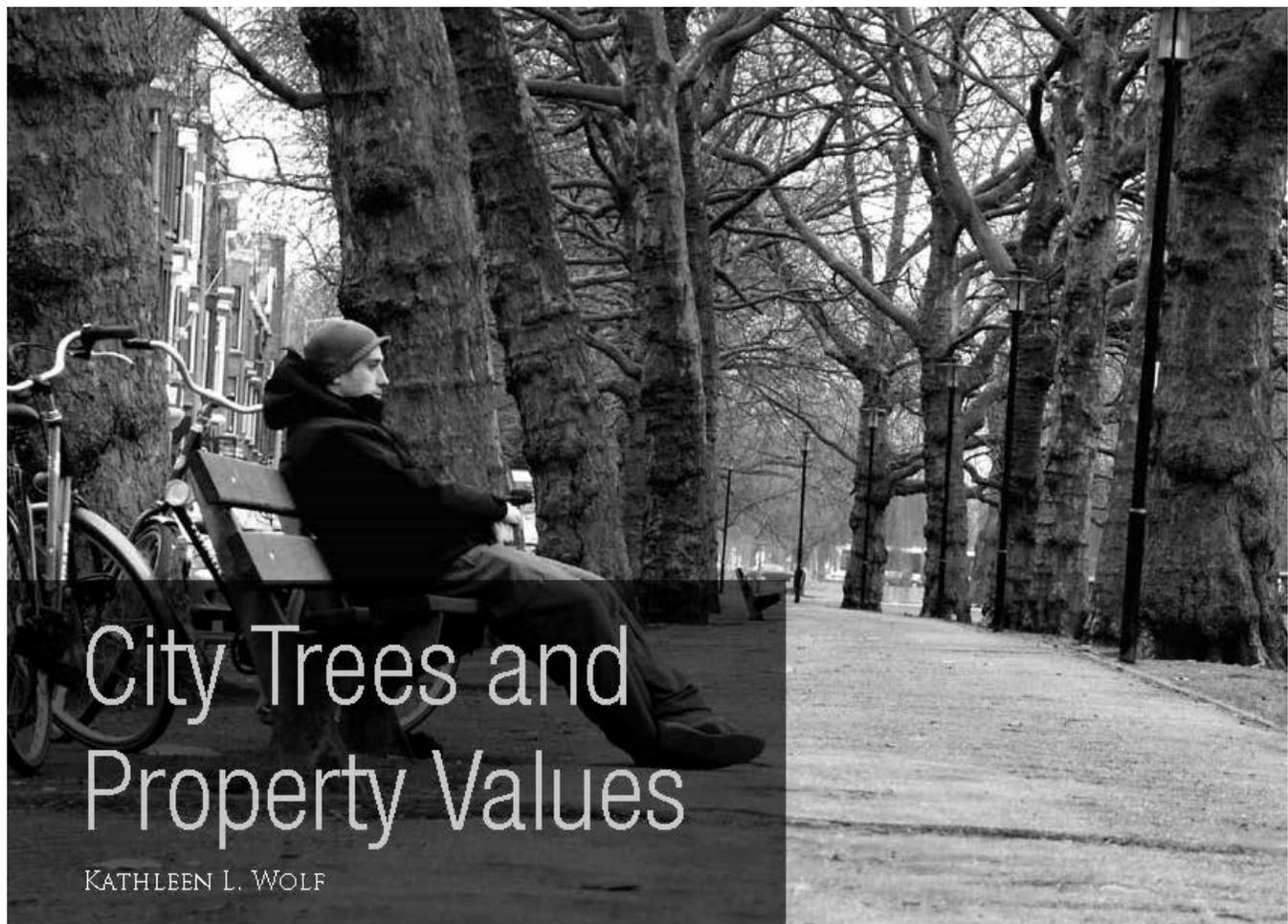
One neighborhood had a tree canopy of 18 percent and the other 28 percent. Income, education, home ownership, race and other socioeconomic factors were statistically controlled in order to provide a comparison of identical populations.

The results are quite compelling – in fact, they will inspire you to grab your shovel and start planting trees.

In the community with 28 percent canopy cover, we would expect to find 18 percent less obesity and 20 percent less Type 2 diabetes, as well as 11 percent more vigorous physical activity. Obesity is a major factor in many of the chronic diseases becoming so prevalent in the U.S., which means any reduction in obesity – even 5 percent – has incredibly important health implications.

Another, more controversial finding of the predictive modeling is 10 percent less asthma in the neighborhood with higher tree canopy, when high traffic roadways are factored into the analysis. This is especially notable because asthma has a complicated relationship with trees. Trees significantly impact respiratory health by capturing large amounts of air pollution and by cooling the air, yet certain tree species also exacerbate asthma due to the allergens they produce. At the Tree Foundation, the evidence from these recent studies on the health benefits of trees has led us to redouble our efforts to carefully plan, plant and nurture more trees – preferably large trees – in all of our urban and suburban communities.

Cindy Blain is research and innovation director for the Sacramento Tree Foundation.



City Trees and Property Values

KATHLEEN L. WOLF



Urban nature in all its forms—urban forests, parks, greenbelts—provides a range of benefits and services to society, most of which are not readily bought and sold. Economists calculate the use value of nature and ecosystems when tangible goods can be exchanged at market prices, such as timber or fisheries products. Non-use values set up a more complex economic puzzle. How do you estimate values for the many indirect, intangible services and functions that urban nature provides, such as beauty, ecosystem services and psychological benefits?

The issue of valuation has become paramount in today's society. What is not counted does not count in the public arena. When markets do not exist for a resource in question then efforts are made to derive monetary value. Natural settings, ranging from wildland to urban, offer many beneficial life-support functions. Nonmarket valuation

techniques arose from the desire to represent the natural environment in the decision-making calculus within communities.

Valuation and decisions

Land ownership and improvements can be expensive in urban areas. If the values of intangibles are not represented, hard costs become powerful disincentives to invest in natural capital. Without some indicator of economic value, there is little financial incentive to consider urban nature in land-use decisions, market transactions and capital investment budgets.

In the public sector, local leaders often make decisions about natural resources based on cost-benefit analysis. Any public investment or policy proposal that incurs public costs or affects private development brings forward advocates with evidence on how much market value will be gained



Faculty Management Journal

or lost. Those who favor conserving or creating nonproductive nature are often at a disadvantage—as they cannot readily express the monetary gains or losses arising from environmental changes.

The challenge is that city trees and open space are public goods. Consumption of a public good by one individual does not reduce the amount of the good available for consumption by others. Another key property of public goods is that they are nonexcludable. Any number of people who walk under a splendid street tree will enjoy its shade and beauty immediately or over the course of several decades—irrespective of who pays for the planting and maintenance of the tree. It is nearly impossible to exclude any nonpaying individuals from consuming the good.

Government authorities have often invested in public goods that members of society accept as providing value, such

as education or emergency response systems. Having some way to estimate the value of nature's services helps local governments to weigh costs against returns from development or prioritize payments for green versus gray infrastructure.

Nonmarket valuation is helpful in the private sector as well. The pursuit of profit is based on estimates of costs and revenues. Nonmarket valuations offer the developer and land manager information to estimate return on investment for land development projects. For instance, there may be extra costs associated with taking greater care to protect trees during site preparation, but those costs may be offset by higher purchase prices for the building lots.

Hedonic pricing method

Although the value of nature to property owners and communities is rarely known in precise dollars, its existence can be detected indirectly. Methods for nonmarket valuation

include travel cost method, deferred and replacement costs analysis, and contingent valuation method.

Hedonic pricing is a revealed willingness-to-pay technique. It attempts to capture the proportion of property prices that are derived from the non-use value of trees and other natural elements. It is a partial measure of value, obtained from indirect inferences about spending and prices.

Hedonic pricing studies have been done since the 1960s. Most use least squares regression analysis as the primary statistical tool. Property prices or assessments are regressed against sets of control variables: environmental attributes of the house or property, other neighborhood variables (such as the quality of local schools) and structural characteristics of the house (such as number of bedrooms). One can then estimate how a change in a natural feature—such as yard trees or proximity to a nearby park—is



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related to a change in property value, holding other characteristics of the property constant. The advantage of this method over others is its use of actual market transactions versus hypothetical questionnaires or indirect assessments.

Urban areas are ideal for the application of hedonic pricing because there is usually a wealth of data available on house and property sales. Geographic databases enable analysis of value increments based on proximity to natural features such as parks. Hedonic values can be capitalized by local governments as increased property tax assessments or as excise taxes paid on property sales. The calculated value across all properties influenced by a natural feature can be aggregated, and the case may be made that the sum is adequate to pay for annual debt and maintenance of the feature, such as street trees or greenspace.

Review of valuations

This overview of hedonic studies focuses on properties in urban settings

Yard and street trees

Studies about trees and residential property values have evaluated a range of urban forest and landscape conditions on single-family homes. Although there have been a few exceptions, homes with trees are generally preferred to comparable homes without trees, with the trend across studies being a price increase of about seven percent. The following are results from a selection of studies:

Price increase	Condition
2%	mature yard trees (greater than 9-inch dbh)
3-5%	trees in front yard landscaping
6-9%	good tree cover in a neighborhood
10-15%	mature trees in high-income neighborhoods

Price effect is variable and depends on how tree presence is defined. In addition, the socioeconomic condition of a residential area makes a difference. For instance, greater increments of value are seen for tree planting and landscape improvements in lower-quality neighborhoods.

Tree retention in development

Many communities have codes or ordinances that regulate tree preservation on residential development sites. Site developers may argue that tree protection costs are prohibitive. Understanding potential market values in different forest conditions is an important step in understanding the economics of forest protection. Market price studies of treed versus untreed lots show this range:

Price increase	Condition
18%	building lots with substantial mature tree cover
22%	tree-covered undeveloped acreage
19-35%	lots bordering suburban wooded preserves
37%	open land that is two-thirds wooded

How do you estimate values for the many indirect, intangible services and functions that urban nature provides, such as beauty, ecosystem services and psychological benefits?

Generally, trees and forest cover in development growth areas add value to parcels. One study found that development costs were 5.5 percent greater for lots where trees were conserved. Given increased lot





and home valuations, builders have reported that they were able to recover the extra costs of preserving trees in a higher sales price for a house and that homes on wooded lots sell sooner than homes on unwooded lots.

Variability and limitations

Decades of research findings indicate that property values are consistently higher with the presence of trees. There are a few studies that show modest or no results, but even fewer show any negative price effect for city trees. In studies where distance effects can be measured, properties closest to naturalistic parks and greenspace have greatest value.

Despite these general patterns, there is great variability in hedonic analysis valuations. Why would that be? First, the statistical models may omit property characteristics that can bias estimates of amenity value. Such omissions may be due to inadequate research design, or the data for a key characteristic simply may not be available at a reasonable effort.

From a statistical standpoint it is assumed that there is an additive influence of city trees on property prices. Yet a causal relationship is rarely so simple, and all possible environmental inputs are difficult to capture, nor are they independent of each other.

These difficulties raise more philosophical questions. Is it really possible to calculate a price that communicates all the services and benefits that trees provide? There are some very practical limitations of hedonic analysis.

Trees and forests provide diverse environmental services such as air and water quality improvements, flood control and wildlife habitat. Such benefits extend beyond the boundaries of a single parcel or may be invisible to buyers and so may not be adequately captured in hedonic analysis. Urban forest analysis tools (such as STRATUM, UFORE and cityGreen) address the economics of distributed services, and some include hedonic analysis as one input in a broader economic model. Yet local decision makers may not understand the nuances of resource economics and may assume

that property values represent the sole economic contribution of trees. The true and full value of city trees and forests will usually be greater than the value estimated by hedonic analysis alone.

Finally, in communicating about trees in terms of price, there is the risk of reducing the meaning of trees to purely economic terms. Hedonic calculations may be an awkward and incomplete way to describe the range of values that people place on

having quality trees and forests in their communities. For most people, there are matters of meaning and principle that are beyond economic calculations of nature. Keen observers of nature have noted the beauty and restorative qualities of trees for centuries. Recent studies of the human dimensions of urban forests are just starting to reveal the breadth and depth of benefits from the human experience of nature. Talking about trees in terms of a narrow estimation of

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value may limit public debate about the importance of trees in communities.

Hedonic pricing and other nonmarket valuations are important contributions to local decision making. Yet those who use and report such studies must understand that the valuation process is fraught with uncertainty and assumptions. The point of using any valuation analysis is not so much to think exclusively in money or market terms but to frame choices and make clear the trade-offs between alternative outcomes. How do the costs and benefits of investments in natural capital compare to

investments in other urban services such as law enforcement or education? Is the trade-off worthwhile? These are the types of questions for which even preliminary valuation can provide useful information. Quantifying the value that society assigns to trees and greenspaces, hedonic analysis can inform

public discussions about urban forest investment and stewardship. *FNU*

"City Trees and Property Values" is a reprint from the August 2007 issue of *Arborist News*, published by the International Society of Arboriculture.



Kathleen Wolf is a research social scientist at the University of Washington, Seattle. Her work focuses on the human dimensions of urban forests and ecosystems, including community development. Information about Wolf's research program can be found at www.cfr.washington.edu/research/envmind.

Photo: University of Washington, Mary Levin

September/October 2008

MEASURING THE ECONOMIC VALUE *of a* CITY PARK SYSTEM



THE TRUST *for* PUBLIC LAND
CONSERVING LAND FOR PEOPLE

Cover Photos: Scott Parker (left), Nita Winter (right)

MEASURING THE ECONOMIC VALUE *of a* CITY PARK SYSTEM

WRITTEN BY
Peter Harnik and Ben Welle

ADDITIONAL ASSISTANCE BY
Linda S. Keenan

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INTRODUCTION

Cities are economic entities. They are made up of structures entwined with open space.

Successful communities have a sufficient number of private homes and commercial and retail establishments to house their inhabitants and give them places to produce and consume goods. Cities also have public buildings—libraries, hospitals, arenas, city halls—for culture, health, and public discourse. They have linear corridors—streets and sidewalks—for transportation. And they have a range of other public spaces—parks, plazas, trails, sometimes natural, sometimes almost fully paved—for recreation, health provision, tourism, sunlight, rainwater retention, air pollution removal, natural beauty, and views.

In successful cities the equation works. Private and public spaces animate each other with the sum greatly surpassing the parts. In unsuccessful communities some aspect of the relationship is awry: production, retail, or transportation may be inadequate; housing may be insufficient; or the public realm might be too small or too uninspiring.

In 2003, The Trust for Public Land's Center for City Park Excellence gathered two dozen park experts and economists in Philadelphia for a colloquium to analyze how park systems economically benefit cities. Based on this conversation and subsequent consultation with other leading economists and academics, the center identified seven attributes of city park systems that provide economic value and are measurable.

Not every aspect of a park system can be quantified. For instance, the mental health value of a walk in the woods is not known, and there is no agreed-upon methodology for valuing the carbon sequestration value of a city park. But seven major factors—*property value, tourism, direct use, health, community cohesion, clean water, and clean air*—have been enumerated. While the science of city park economics is still in its infancy, TPL has worked to carefully consider and analyze these values. Our report sets forth a summary of this methodology.

Two of the factors provide a city with *direct income* to its treasury. The first factor is increased property tax from the increase in property value because of proximity to parks. (This is also called “hedonic value” by economists.) The second is increased sales tax on spending by tourists who visit primarily because of the city's parks. (Beyond the tax receipts, these factors also bolster the *collective wealth* of residents through property appreciation and tourism revenue.)

Three other factors provide city residents with *direct savings*. By far the largest amount stems from residents' use of the city's free parkland and free (or low-cost) recreation opportunities, which saves them from having to purchase these items in the marketplace. The second is the health benefit—savings in medical costs—due to the beneficial aspects of exercise in the parks. And the third is the community cohesion benefit of people banding together to save and improve their neighborhood parks. This “know-your-neighbor” social capital helps ward off antisocial problems that would otherwise cost the city more in police and fire protection, prisons, counseling, and rehabilitation.

The last two factors provide *environmental savings*. The larger involves water pollution reduction—the retention of rainfall by the park system’s trees, bushes, and soil, thus cutting the cost of treating stormwater. The other concerns air pollution—the fact that park trees and shrubs absorb a variety of air pollutants.

In the following chapters, after describing the value factor and the rationale for calculating it, we provide a real-life example of the mathematical outcome, based on the first five test cases undertaken in this program—the cities of Washington, D.C., San Diego, Boston, Sacramento, and Philadelphia.

Peter Harnik
Director, Center for City Park Excellence
March 2009

INCREASING HEDONIC (PROPERTY) VALUE

More than 30 studies have shown that parks have a positive impact on nearby residential property values. Other things being equal, most people are willing to pay more for a home close to a nice park. Economists call this phenomenon “hedonic value.” (Hedonic value also comes into play with other amenities such as schools, libraries, police stations, and transit stops. Theoretically, commercial office space also exhibits the hedonic principle; unfortunately, no study has yet been carried out to quantify it.)

Hedonic value is affected primarily by two factors: distance from the park and the quality of the park itself. While proximate value (“nearby-ness”) can be measured up to 2,000 feet from a large park, most of the value is within the first 500 feet. In the interest of being conservative, we have limited our valuation to this shorter distance. Moreover, people’s desire to live near a park depends on characteristics of the park. Beautiful natural resource parks with great trees, trails, meadows, and gardens are markedly valuable. Other parks with excellent recreational facilities are also desirable (although sometimes the greatest property value is a block or two away if there are issues of noise, lights, and parking). Less attractive or poorly maintained parks are only marginally valuable. And parks with frightening or dangerous aspects can reduce nearby property values.

Determining an accurate park-by-park, house-by-house property value for a city is technically feasible but prohibitively time-consuming and costly. Therefore, we formulated a methodology to arrive at a reasonable estimate. Computerized mapping technology known as Geographic Information Systems (GIS) was used to identify all residential properties within 500 feet of every significant park. (“Significant” is defined as one acre or more; “park” includes every park in the city even if owned by a county, state, federal, or other public agency.)

Unfortunately, because of data and methodology problems, it is difficult to determine exactly which of a city’s parks confer “strongly positive,” “slightly positive,” and “negative” value to surrounding residences. Research into quantifying park quality continues; in the interim we have chosen to assign the conservative value of 5 percent as the amount that parkland adds to the assessed value of all dwellings within 500 feet of parks. (The preponderance of studies has revealed that excellent parks tend to add 15 percent to the value of a proximate dwelling; on the other hand, problematic parks can subtract 5 percent of home value. Taking an average of this range yields the 5 percent value that will be used until a park quality methodology can be established.)

Once determined, the total assessed value of properties near parks is multiplied by 5 percent and then by the tax rate, yielding the increase in tax dollars attributable to park proximity.



Meridian Hill Park in Washington, D.C. provides extra value to the thousands of dwelling units surrounding it, and to the city itself through higher property tax receipts.

PARK VALUE IN ACTION

Increasing Property Values in Washington, D.C.

The most famous park in Washington, D.C. may be the National Mall with its museums and government agencies, but it is the many other parks—from huge Rock Creek Park to tiny Logan Circle, the ones surrounded by homes—that provide the city with the greatest property value benefit.

The city’s abundance of green has placed much of Washington’s real estate either directly abutting or within a stone’s throw of a park. This makes it convenient for the capital’s denizens to toss a ball around, enjoy a picnic, or just get a pleasurable view. The city’s coffers are also reaping the benefits.

Getting to this number is fairly straightforward. Using GIS in combination with the city’s assessment data, we find that the value of all residential properties (apartments, condominiums, row houses, and detached homes) within 500 feet of a park is almost \$24 billion (in 2006 dollars). Using an average park value benefit of 5 percent, we see that the total amount that parks increased property value is just under \$1.2 billion. Using the effective annual tax rate of 0.58 percent, we find that Washington reaped an additional \$6,953,377 in property tax because of parks in 2006.

The Hedonic (Property) Value of Washington, D.C.’s Parks	
Value of properties within 500 feet of parks	\$23,977,160,000
Assumed average value of a park	5%
Value of properties attributed to parks	\$1,198,858,025
Effective annual residential tax rate	0.58%
Annual property tax capture from value of property due to parks	\$6,953,377
Property values were obtained from the District of Columbia	

INCOME FROM OUT-OF-TOWN PARK VISITOR SPENDING (TOURISTS)

Though not always recognized, parks play a major role in a city's tourism economy. Some such as Independence National Historic Park in Philadelphia, Central Park in New York, Millennium Park in Chicago, or Balboa Park in San Diego are tourist attractions by themselves. Others are simply great venues for festivals, sports events, even demonstrations. Read any newspaper's travel section and you'll usually see at least one park among the "to see" picks.

Calculating parks' contribution requires knowing the number of park tourists and their spending. Unfortunately, most cities have little data on park visitation or visitor origin. (By definition, local users are not tourists — any spending they do at or near the park is money not spent locally somewhere else, such as in their immediate neighborhood.) Sometimes there are tourism numbers for one particularly significant park, but it is not possible to apply these numbers to the rest of the city's parks. To get around these missing data, visitation numbers and expenditures from other sources must be obtained and then used to make an educated guess about trips that are taken entirely or substantially because of parks or a park.

First, we estimate the number of park tourists. Then we reduce this to an estimate of the number of park tourists who came *because* of the parks. After dividing that number into day visitors (who spend less) and overnighters (who spend more), we multiply these numbers by the average spending per tourist per day (a figure that is usually well known by the local convention and visitors bureau). Finally, tax revenue to the city can be estimated by multiplying park tourism spending by the tax rate.



Jon Sullivan (www.pdpphoto.org)

Beautiful Balboa Park—with its zoo, botanical gardens, numerous museums, sports fields, and public events—is the single biggest tourist attraction in San Diego.

PARK VALUE IN ACTION

Stimulating Tourism in San Diego

A visit to San Diego is not complete if it doesn't include a park—whether that's a beach, a harbor park, Old Town State Park, Mission Bay, or 1,200-acre Balboa Park. In fact, when the *New York Times* featured San Diego in its "36 Hours" travel series, it mentioned all of the above places. The role of parks in the city's tourism economy is huge.

Spending by Tourists Who Came Because of Parks, San Diego, 2006	
<i>Overnight Visitors</i>	
Overnight visitors to San Diego	16,050,000
Overnight visitors who visited parks (20%*)	3,210,000
Estimated 26%* who visited <i>because</i> of parks	834,600
Spending per overnight visitor per day	\$107
Spending of overnight visitors because of parks	\$87,302,200
<i>Day Visitors</i>	
Overnight visitors to San Diego	11,874,000
Overnight visitors who visited parks (20%)	2,374,800
Estimated 22% who visited because of parks	522,456
Spending per day visitor per day	\$48
Spending of day visitors because of parks	\$25,077,888
Total Spending (overnight and day visitors)	\$114,380,088
Sales, meal, and hotel taxes (7.5% average) on park tourist spending	\$8,578,507
Net profit (35% of tourist spending)	\$40,033,031
<small>*San Diego Convention and Visitors Bureau and California Travel and Tourism Commission, 2006.</small>	

According to data from the San Diego Convention and Visitors Bureau (CVB), the California Travel and Tourism Commission, and a telephone survey by the Morey Group, an estimated 20 percent of tourists visited a park while in San Diego in 2007. The phone survey further revealed that 22 percent of San Diego park visitors came *because* of the parks. (Using this methodology assures that the count did not include the many tourists who came to San Diego for other reasons and happened to visit a park without planning to do so.) The conclusion was that just under 5 percent of San Diego tourism in 2007 was due to the city's parks—835,000 overnighters and 522,000 day visitors.

Knowing the average daily spending level of those tourists—\$107 per overnight visitor and \$48 per day visitor—we determined that total park-derived tourist spending in 2007 came to \$114.3 million. With an average tax rate on tourist expenditures of 7.5 percent, tax revenue to the city was \$8,579,000. In addition, since economists consider that an average of 35 percent of every tourist dollar is profit to the local economy (the rest is the pass-through cost of doing business), the citizenry's collective increase in wealth from park-based tourism was \$40,033,000.

DIRECT USE VALUE

While city parks provide much indirect benefit, they also provide huge tangible value through such activities as team sports, bicycling, skateboarding, walking, picnicking, benchsitting, and visiting a flower garden. Economists call these activities “direct uses.”

Most direct uses in city parks are free of charge, but economists can still calculate value by knowing the cost of a similar recreation experience in the private marketplace. This is known as “willingness to pay.” In other words, if parks were not available in a city, how much would the resident (or “consumer”) pay in a commercial facility? (Thus, rather than income, this value represents *savings* by residents.)

The model used to quantify the benefits received by direct users is based on the “Unit Day Value” method developed by the U.S. Army Corps of Engineers. Park visitors are counted by specific activity, with each activity assigned a dollar value by economists familiar with prices in the private marketplace. For example, playing in a playground is worth \$3.50. Running, walking, or in-line skating on a park trail is worth \$4, as is playing a game of tennis on a city court. For activities for which a fee is charged, like golf or ice skating, only the “extra value” (if any) is assigned; that is, if a round of golf costs \$20 on a public course and \$80 on a private course, the direct use value of the public course would be \$60. Under the theory that the second and third repetitions of a park use in a given period are slightly less valuable than the first (i.e., the child visiting a playground gets somewhat less value the seventh time in a week than the first), we modified the model with diminishing returns for heavy park users. (For example, playground value diminishes from \$3.50 for the first time in a week to \$1.93 for the seventh.) We also estimated an average “season” for different park uses to take into account reduced participation rates in the off-season. (Although some people are active in parks 365 days a year, we conservatively eliminated seasons when participation rates drop to low levels.) Finally, for the few activities for which a fee is charged, such as golf, ice skating, and the use of fields for team sports, we subtracted the per-person fee from the assumed value.

The number of park visits and the activities engaged in is determined through a professionally conducted telephone survey of city residents. Residents are asked to answer for themselves; for those adults



Boston Parks and Recreation Department

The Frog Pond in the Boston Common is but one of the numerous park facilities that provide Bostonians with hundreds of millions of dollars of direct use value.

with children under the age of 18, a representative proportion are also asked to respond for one of their children. (Nonresidents are not counted in this calculation; their value is measured through out-of-town tourist spending.)

While some might claim that direct use value is not as “real” as tax or tourism revenue, it nevertheless has true meaning. Certainly, not all park activities would take place if they had to be purchased. On the other hand, city dwellers do get pleasure and satisfaction from their use of the parks. If they had to pay and if they consequently reduced some of this use, they would be materially “poorer” from not doing some of the things they enjoy.

PARK VALUE IN ACTION

Providing Direct Use Value in Boston

When Frederick Law Olmsted designed the park system of Boston, he envisioned a series of places of respite accessible to all. No need to pay for a trip out to the countryside—the park system could provide that—and more—right near home. Today that vision lives on in Boston’s 5,040 acres of parks and the pastimes these parks offer: jogging down the Commonwealth Avenue median and into Boston Common, spending a morning at the playground, watching a tennis match, birdwatching across 1,765 natural acres, attending a summer festival, enjoying lunch in Post Office Square, walking the trails of 527-acre Franklin Park, admiring the flowers of the Public Garden, or taking in movie night in Jamaica Pond Park.

These and many more “direct uses” were measured in a telephone survey of Boston residents and were then multiplied by a specific dollar value for each activity. Based on the level of use and those values, it was found that in 2006 Boston’s park and recreation system provided a total of \$354,352,000 in direct use value.

Shared Benefits: The Economic Value of Direct Use of Parks in Boston, 2006			
Facility/Activity	Person-Visits	Average Value per Visit	Value (\$)
General park use (playgrounds, trails, dog walking, picnicking, sitting, etc.)	76,410,237	\$1.91	\$146,230,236
Sports facilities use (tennis, team sports, bicycling, swimming, running, ice skating, etc.)	48,407,572	\$3.05	\$147,812,453
Special uses (golfing, gardening, festivals, concerts, attractions, etc.)	6,467,113	\$9.33	\$60,309,713
Totals	131,284,922		\$354,352,402

Data were drawn from a telephone survey of 600 Boston residents.

HEALTH VALUE

Several studies have documented the economic burden of physical inactivity. Lack of exercise is shown to contribute to obesity and its many effects, and experts call for a more active lifestyle. Recent research suggests that access to parks can help people increase their level of physical activity. The Parks Health Benefits Calculator measures residents' collective economic savings through the use of parks for exercise.

After identifying the common types of medical problems that are inversely related to physical activity, such as heart disease and diabetes, we created the calculator based on studies in seven different states that show a \$250 cost difference between those who exercise regularly and those who don't. For people over the age of 65, the value is \$500 because seniors typically incur two or more times the medical care costs of younger adults.

The key data input is the number of park users who indulge in a sufficient amount of physical activity to make a difference. (This is defined as "at least 30 minutes of moderate to vigorous activity at least three days per week.") To determine this number, we took a telephone park use survey of activities and age and eliminated low-heart-rate uses such as picnicking, sitting, strolling, and birdwatching. We also eliminated respondents who engage in strenuous activities but do so less than three times per week because they are not active enough for health benefit.

After obtaining the number (and age) of city dwellers engaged in strenuous park activities, we applied the multipliers (by age) and added the subtotals. The calculator makes one final computation, applying a small multiplier to reflect the differences in medical care costs between the city's region and the United States as a whole.



Sacramento Department of Parks and Recreation

With or without a stroller, a regular vigorous run can cut medical costs by an average of \$250 a year. McKinley Park, Sacramento.

PARK VALUE IN ACTION

Promoting Human Health in Sacramento

Sacramento has 5,141 acres of parks that provide a multitude of ways to stay healthy. The city has 43 tennis courts, 101 baseball diamonds, 116 basketball hoops, 171 playgrounds, 78 soccer fields, 7 skate parks, 12 swimming pools, over 80 miles of trails, and many more facilities.

Using the Parks Health Benefits Calculator, we determined the medical savings realized by city residents because of park exercise and found that about 78,000 Sacramentans engage actively enough in parks to improve their health — 72,000 of them under the age of 65 and about 6,000 older. Using the estimated dollar value attributable to those activities, we calculated the savings in 2007, which came to \$19,872,000.

Health Care Savings: Physically Active Users of Sacramento Parks, 2007

Cost Description	Residents Physically Active in Parks*	Average Medical Cost Difference Between Active and Inactive Persons	Amount
Adult users under 65 years of age	71,563	\$250	\$17,890,750
Adult users 65 years of age and older	6,054	\$500	\$3,027,000
Subtotals combined	77,617	—	\$20,917,750
Regional cost multiplier (based on statewide medical costs)			0.95
Total Value			\$19,871,863

*People engaging in moderate, vigorous, or strenuous activity at least half an hour, three days per week

COMMUNITY COHESION

Numerous studies have shown that the more webs of human relationships a neighborhood has, the stronger, safer, and more successful it is. Any institution that promotes this kind of community cohesion—whether a club, a school, a political campaign, a religious institution, a co-op—adds value to a neighborhood and, by extension, to the whole city.

This human web, which Jane Jacobs termed “social capital,” is strengthened in some cities by parks. From playgrounds to sports fields to park benches to chessboards to swimming pools to ice skating rinks to flower gardens, parks offer opportunities for people of all ages to interact, communicate, compete, learn, and grow. Perhaps more significantly, the acts of improving, renewing, or even saving a park can build extraordinary levels of social capital. This is particularly true in a neighborhood suffering from alienation partially due to the lack of safe public spaces.

While the economic value of social capital cannot be measured directly, it is instructive to tally the amount of time and money that residents devote to their parks. This can serve as a proxy. In cities with a great amount of social capital, park volunteers do everything from picking up trash and pulling weeds to planting flowers, raising playgrounds, teaching about the environment, educating public officials, and contributing dollars to the cause.

To arrive at the number, all the financial contributions made to “friends of parks” groups and park-oriented community organizations and park agencies are tallied. Also added up, through contacting each organization, are the hours of volunteer time donated to park organizations. This number is then multiplied by the value assigned to volunteerism by the national organization Independent Sector. (This value varies by year and by state.)



Philadelphia Department of Parks and Recreation

With more than 100 “friends of parks” groups, Philadelphia has few peers when it comes to park-based social capital.

PARK VALUE IN ACTION

Stimulating Community Cohesion in Philadelphia

Philadelphia parks have support galore. In fact, there are more than 100 “friends of parks” organizations. Two of them, the Philadelphia Parks Alliance and Philadelphia Green, operate on a citywide basis; the rest deal with individual parks.

This impressive web of formal and informal action greatly boosts the civic life of the city, and it is measurable economically. Using the “community cohesion” methodology, we tallied the financial contributions made to all these groups in 2007. Then we added up the total volunteer hours donated to parks and converted them to a dollar figure (at \$18.17 per hour, the latest figure available for the state of Pennsylvania). Combining the two yielded a 2007 community cohesion value of \$8,600,000.

Community Cohesion Value: Park Supporters in Philadelphia

Organization or Activity	Volunteer Hours	Value of Volunteer Hours*	Financial Contributions	Total
Fairmount Park Volunteers (54 friends groups)	154,209	\$2,894,503	\$3,318,713	\$6,213,216
Independence National Historical Park	10,390	\$195,017	—	\$195,017
Pennsylvania Horticultural Society (52 friends groups)	65,052	\$1,221,026	\$694,680	\$1,915,706
Other support groups, combined	452	\$8,485	\$267,961	\$276,446
Total Value		\$4,319,031	\$4,281,354	\$8,600,385

*Value of one hour of volunteer labor in Pennsylvania as determined by Independent Sector, 2005: \$18.77.

REDUCING THE COST OF MANAGING URBAN STORMWATER

Stormwater runoff is a significant problem in urban areas. When rainwater flows off roads, sidewalks, and other impervious surfaces, it picks up pollutants. In some cases (cities with sewer systems that separate household sewage from street runoff), the polluted rainwater flows directly into waterways, causing significant ecological problems. In other cases (cities with combined household and street systems), the rainwater is treated at a pollution control facility, but larger storms dump so much water that the system is designed to overflow when capacity is exceeded, resulting in spillage of both rainwater and household sewage.

Parkland reduces stormwater management costs by capturing precipitation and/or slowing its runoff. Large pervious (absorbent) surface areas in parks allow precipitation to infiltrate and recharge the groundwater. Also, vegetation in parks provides considerable surface area that intercepts and stores rainwater, allowing some to evaporate before it ever reaches the ground. Thus urban green spaces function like ministorage reservoirs.

The Western Research Station of the U.S. Forest Service in Davis, California, developed a model to estimate the value of retained stormwater runoff due to green space in parks. First, land cover data are obtained through analysis of aerial photographs. This reveals forested as well as open grassy areas and also water surface; it also reveals impervious surfaces in parks—roadways, trails, parking lots, buildings, and hard courts.

Second, the same photographs are then analyzed for the amount of perviousness of the *rest* of a city—in other words, the city without its parkland and not counting surface water. (Pervious land in the city can consist of residential front and back yards as well as private natural areas such as cemeteries, university quadrangles, and corporate campuses.)

Third, the amount and characteristics of rainfall are calculated from U.S. weather data. The model (which combines aspects of two other models developed by researchers with the U.S. Forest Service) uses hourly annual precipitation data to estimate annual runoff. By comparing the modeled runoff (with parks) and the runoff that would occur from a city the same size and level of development (i.e., with streets, rooftops, parking lots, etc. but without any parks), we can calculate the reduction in runoff due to parks.

The final step involves finding what it costs to manage each gallon of stormwater using traditional methods (i.e., “hard infrastructure” such as concrete pipes and holding tanks rather than parkland). By knowing this number and the amount of water held back by the park system, we can assign an economic value to the parks’ water pollution reduction.



Philadelphia Department of Parks and Recreation
With a wide vegetative buffer to catch runoff, Pennypack Park helps reduce Philadelphia's stormwater management costs.

PARK VALUE IN ACTION

Cutting Stormwater Costs in Philadelphia

Philadelphia’s 10,334-acre park system is one of the oldest in the country, and it provides more than seven acres of parkland for every 1,000 residents. About 12 percent of the city is devoted to parkland, and the water retention value of the trees, grass, riparian corridors, and plants significantly reduce the amount (and cost) of runoff entering the city’s sewer system.

Philadelphia’s parkland is 81.3 percent pervious. The rest of the city is 34.9 percent pervious. Philadelphia receives an average of 43.29 inches of rain per year (with the characteristic mid-Atlantic mix of drizzles, showers, and downpours). The model developed by the Forest Service shows that Philadelphia’s parks reduced runoff in 2007 by 496 million cubic feet compared with a scenario in which the city had no parks. It is estimated that Philadelphia stormwater management cost is 1.2 cents (\$0.012) per cubic foot.

Thus, the park system provided a stormwater retention value of \$5,949,000 in 2007.

Stormwater Costs in Philadelphia per Cubic Foot	
Rainfall on impervious surface	8,667,269,456 cu. ft.
Annual expenditure on water treatment	\$100,000,000
Cost per cubic foot	\$0.012

Cost Savings Due to Runoff Reduction: Philadelphia’s Parks	
Results for Typical Year – 43.29 inches of rainfall	Cubic Feet
Annual rainfall over Entire City of Philadelphia	1,623,928,386
Amount of actual runoff from parks (81.3% perviousness)	168,480,901
Runoff if parks didn’t exist and if that acreage were of the same permeability as rest of city (34.9% perviousness)	664,198,620
Reduction in runoff due to parkland’s perviousness	495,717,719
Estimated stormwater costs per cubic foot	\$0.012
Total savings due to park runoff reduction	\$5,948,613

REMOVAL OF AIR POLLUTION BY VEGETATION

Air pollution is a significant and expensive urban problem, injuring health and damaging structures. The human cardiovascular and respiratory systems are affected, and there are broad consequences for health-care costs and productivity. In addition, acid deposition, smog, and ozone increase the need to clean and repair buildings and other costly infrastructure.

Trees and shrubs remove air pollutants such as nitrogen dioxide, sulfur dioxide, carbon monoxide, ozone, and some particulates. Leaves absorb gases, and particulates adhere to the plant surface, at least temporarily. Thus, vegetation in city parks plays a role in improving air quality and reducing pollution costs.

In order to quantify the contribution of park vegetation to air quality, the Northeast Research Station of the U.S. Forest Service in Syracuse, New York, designed an air pollution calculator to estimate pollution removal and value for urban trees. This calculator, which is based on the Urban Forest Effects (UFORE) model of the U.S. Forest Service, is location-specific, taking into account the air pollution characteristics of a given city. (Thus, even if two cities have similar forest characteristics, the park systems could still generate different results because of differences in ambient air quality)

First, land cover information for all of a city's parks is obtained through analysis of aerial photography (While every city has street trees and numerous other trees on private property, only the trees on public parkland are measured.)

Then the calculator determines the pollutant flow through an area within a given time period (known as "pollutant flux"), taking into account concentration and velocity of deposition. The calculator also takes into account characteristics of different types of trees and other vegetation and seasonal leaf variation.

The calculator uses hourly pollution concentration data from the U.S. Environmental Protection Agency. The total pollutant flux is multiplied by tree-canopy coverage to estimate pollutant removal. The monetary value is estimated using the median U.S. externality value for each pollutant. (The "externality value" refers to the amount it would otherwise cost to prevent a unit of that pollutant from entering the atmosphere. For instance, the externality value of a short ton of carbon monoxide is \$870; the externality value of the same amount of sulfur dioxide is \$1,500.)



National Park Service
Washington, D.C.'s Rock Creek Park has more than 1,500 acres of trees that trap and absorb pollutants from the city's air.

PARK VALUE IN ACTION

Cutting Air Pollution Costs in Washington, D.C.

The trees of Washington, D.C., are the city's lungs, inhaling and exhaling the air flowing around them.

Beyond the famous Japanese cherry trees around the Tidal Basin, the stately elms gracing the Reflecting Pool, and massive oaks of Lafayette Park, there are 4,839 acres of general tree cover in the city's 7,999 acres of parkland. Their aesthetic value is not countable, but the value of the air pollution they extract is. The Air Quality Calculator determined that they removed 244 tons of carbon dioxide, nitrogen dioxide, ozone, particulate matter, and sulfur dioxide in 2005. Based on the dollar values assigned to these pollutants, the savings was \$1,130,000.

Air Pollution Removal Value of Washington D.C.'s Parks, 2005			
Pollutant Type	Tons of Pollutant Removed*	Dollars Saved per Ton Removed	Total Pollutant Removal Value
Carbon dioxide	10.4	\$870	\$9,089
Nitrogen dioxide	43.7	\$6,127	\$267,572
Ozone	83.7	\$6,127	\$512,771
Particular matter	70.3	\$4,091	\$287,709
Sulfur dioxide	35.5	\$1,500	\$53,246
Total	243.6	—	\$19,871,863

*Based on the city's 60.5% tree cover (4,839 acres) of 7,999 acres total parkland.

CONCLUSION

While reams of urban research have been carried out on the economics of housing, manufacturing, retail, and even the arts, there has been until now no comprehensive study of the worth of a city's park system. The Trust for Public Land believes that answering this question—"How much value does an excellent city park system bring to a city?"—can be profoundly helpful to all the nation's urban areas. For the first time, parks can be assigned the kind of numerical underpinning long associated with transportation, trade, housing, and other sectors. Urban analysts will be able to obtain a major piece of missing information about how cities work and how parks fit into the equation. Housing proponents and others may be able to find a new ally in city park advocates. And mayors, city councils, and chambers of commerce may uncover solid justification to strategically acquire parkland in balance with community development projects.

Determining the economic value of a city park system is a science still in its infancy. Much research and analysis lie ahead. And cities themselves, perhaps in conjunction with universities, can help greatly by collecting more specific data about park usership, park tourism, adjacent property transactions, water runoff and retention, and other measures. In fact, every aspect of city parks—from design to management to programming to funding to marketing—would benefit from deeper analysis. In that spirit this report is offered: for the conversation about the present and future role of parks within the life and economy of American cities.

APPENDIX I

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The following individuals took part in the colloquium "How Much Value Does a Park System Bring to a City" in Philadelphia in October 2003.

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Valerie Burns	Boston Natural Areas Network	Boston
Patrice Carroll	Philadelphia Managing Director's Office	Philadelphia
Donald Colvin	Indianapolis Department of Parks and Recreation	Indianapolis
Ernest Cook	The Trust for Public Land	Boston
John Crompton	Texas A&M University	College Station, Texas
Dick Dadey	City Parks Alliance	New York
Nancy Goldenberg	Philadelphia Center City Partners	Philadelphia
Peter Harnik	The Trust for Public Land	Washington, D.C.
Nancy Katka	The Trust for Public Land	Boston
Alastair McFarlane	U.S. Dept of Housing and Urban Development	Washington, D.C.
Ken Meter	Crossroads Resource Center	Minneapolis
Sarah Nicholls	Michigan State University	East Lansing
Joan Rcilly	Pennsylvania Horticultural Society	Philadelphia
Dan Stynes	Michigan State University	East Lansing
Patrice Todisco	Boston GreenSpace Alliance	Boston
Susan Wachter	University of Pennsylvania	Philadelphia
Guijing Wang	Centers for Disease Control	Atlanta
Richard Weisskoff	Everglades Economics Group	North Miami
Wayne Weston	Mecklenburg Parks and Recreation Department	Charlotte, North Carolina
Jennifer Wolch	University of Southern California	Los Angeles
Kathleen Wolf	University of Washington	Seattle
Matt Zieper	The Trust for Public Land	Boston

APPENDIX 3

RESOURCES RELATED TO THE ECONOMIC VALUE OF PARKS

Bedimo-Rung, A. L., A. J. Mowen, and D. Cohen. 2005. The significance of parks to physical activity and public health: A conceptual model. *American Journal of Preventive Medicine* 28(2S2): 159–168.

Center for Urban Forest Research. Collection of “Benefits and Cost” Research. U.S. Forest Service. Davis, California. <http://www.fs.fed.us/psw/programs/cufr/research/studies.php?TopicID=2>.

Correll, M., J. Lillydahl, H. Jane, and L. D. Singell. 1978. The effect of green belts on residential property values: Some findings on the political economy of open space. *Land Economics* 54 (2): 07–217.

Crompton, J. L. 2004. *The Proximate Principle: The Impact of Parks, Open Space and Water Features on Residential Property Values and the Property Tax Base*. Ashburn, VA: National Recreation and Park Association.

Ernst and Young. 2003. *Analysis of Secondary Economic Impacts of New York City Parks*. New York: New Yorkers for Parks.

Gies, F. 2006. *The Health Benefits of Parks: How Parks Keep Americans and Their Communities Fit and Healthy*. San Francisco: The Trust for Public Land.

Lutzenhiser, M., and N. Noelwahr. 2001. The effect of open spaces on a home’s sale price. *Contemporary Economic Policy* 19 (3): 291–298.

McPherson, E. G. 1998. Structure and sustainability of Sacramento’s urban forest. *Journal of Arboriculture* 24 (4): 174–190.

Miller, A. R. 2001. *Valuing Open Space: Land Economics and Neighborhood Parks*. Cambridge: Massachusetts Institute of Technology Center for Real Estate.

Nicholls, S., and J. L. Crompton. 2005. The impact of greenways on property values: Evidence from Austin, Texas. *Journal of Leisure Research* 37 (3): 321–341.

— — —. 2005. Why do people choose to live in golf course communities? *Journal of Park and Recreation Administration* 23 (1): 37–52.

Nowak, D. J., D. E. Crane, and J. C. Stevens. 2006. Air pollution removal by urban trees and shrubs in the United States. *Urban Forestry and Urban Greening* 4: 115–123.

Nowak, D. J., D. E. Crane, J. C. Stevens, and M. Ibarra. 2002. *Brooklyn's Urban Forest*. USDA Forest Service General Technical Report. NE-290. Newtown Square, PA: U.S. Department of Agriculture.

Nowak, D. J., R. E. Hoehn, D. E. Crane, J. C. Stevens, and J. T. Walton. 2006. *Assessing Urban Forest Effects and Values: Washington, D.C.'s Urban Forest*. USDA Forest Service Resource Bulletin. NRS-1. Newtown Square, PA: U.S. Department of Agriculture.

Nowak, D. J., R. E. Hoehn, D. E. Crane, J. C. Stevens, J. T. Walton, J. Bond, and G. Ina. 2006. *Assessing Urban Forest Effects and Values: Minneapolis' Urban Forest*. USDA Forest Service Resource Bulletin. NE-166. Newtown Square, PA: U.S. Department of Agriculture.

Nowak, D. J., P. J. McHale, M. Ibarra, D. Crane, J. Stevens, and C. Luley. 1998. Modeling the effects of urban vegetation on air pollution. In *Air Pollution Modeling and Its Application XII*, ed. S. Gryning and N. Chaumerliac. New York: Plenum Press 399-407.

Stynes, D. J., D. B. Propst, W. H. Chang, and Y. Sun. *Estimating Regional Economic Impacts of Park Visitor Spending: Money Generation Model Version 2 (MGM2)*. East Lansing: Department of Park, Recreation and Tourism Resources, Michigan State University.

Stynes, D. J. 1997. *Economic Impacts of Tourism: A Handbook for Tourism Professionals*. Urbana: University of Illinois, Tourism Research Laboratory. <http://web4.canr.msu.edu/mgm2/econ/>.

Wachter, S. M. and G. Wong July 2006. *What Is a Tree Worth? Green City Strategies and Housing Prices*. <http://ssrn.com/abstract=931736>.

Walker, C. 2004. *The Public Value of Urban Parks*. Washington, DC: Urban Institute. <http://www.wallacefoundation.org/NR/rdonlyres/5EB4590E-5E12-4E72-B00D-613A42E292E9/0/ThePublicValueofUrbanParks.pdf>.



Conserving land for people

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Letter 08 Response	Community Groups & Individuals Multiple signatories 9-25-14
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- 08-1 The commenter provides a brief overview of the issues raised in the comment letter. Individual responses to each of the specific issues raised in the letter are provided below. No further response is necessary.
- 08-2 The commenter suggests several additional policies to support ER Goal 3.1 Urban Forest. These recommended policies will be provided to City Council for consideration as part of the staff report for the project decision. These comments relate to the merits of the project; they do not raise issues with the adequacy of the Draft MEIR. No further response is necessary.
- 08-3 The commenter recommends expanding the definition of Heritage Trees to encompass canopy trees. This recommendation will be provided for City Council for consideration as part of the staff report for the project decision. The commenter indicates that the MEIR may not adequately evaluate the impacts of the proposed 2035 General Plan related to tree canopy. This issue was addressed previously in response to comment I47-6. No further response is necessary.
- 08-4 The commenter indicates that the MEIR does not fully account for the difference between tree loss and tree replacement. As indicated in the Draft MEIR (p. 4.3-19) the City's policy is to retain trees, whenever possible, regardless of size and the City protects Heritage Trees under ordinance. Several proposed General Plan policies, including ER 3.1.6 and 3.1.7, promote tree planting to increase the City's tree canopy, which increases shade thereby reducing urban heat island effect and energy consumption. Other proposed policies, such as ER 3.1.8 and 3.1.9, focus on public education regarding the importance of trees and on providing adequate funding to maintain the city's urban forest. The commenter does not indicate specifically how, given the extensive number of policies promoting an increase in trees, a "net removal" of trees might occur. Net removal of trees is not an expected outcome. Regarding the difference between tree loss and tree replacement, although this issue does not pertain to the Draft MEIR's environmental analysis, new replacement trees would not immediately compensate for the benefits of large trees that cannot feasibly be retained; however, the proposed 2035 General Plan is based on a 20-year planning horizon, and replacement trees planted over 20 years would be at various stages of growth by 2035 and would include large, mature trees.
- 08-5 The commenter requests clarification for the basis of the conclusion that Impact 4.3-10 (substantial reduction in the number of trees within the Policy Area) is less than significant. See responses to comments 08-4 and I47-6. Because the City's policy is to retain trees, regardless of size, and because the proposed 2035 includes several policies to increase the City's tree canopy, not to mention the City's current protection of Heritage and City trees, a substantial loss in the number of trees is not reasonably foreseeable. No further response is necessary.
- 08-6 The commenter requests that the MEIR quantify losses of tree canopy that could result from implementation of the proposed General Plan. Because City policy is to retain trees whenever possible, regardless of size, and because several General Plan policies promote tree planting to increase the tree canopy, it is not anticipated that any net loss would occur. Even if it was assumed that no additional trees would be planted, it is not possible to quantify potential tree removal associated with future development under the proposed 2035 General Plan because the number of trees removed would depend on the specific design of the development. Furthermore, aside from the Subsequent Projects (See Draft MEIR Table 2-2), it is unknown where specific developments will occur within the Policy Area, or what specific type of development within the designated land use might be proposed. See responses to comments

O8-4 and I47-1. A substantial loss in the number of trees is not reasonably foreseeable. No further response is necessary.

- O8-7 The comment raises issues with the proposed change to park service level standard as it relates to funding. As described in Master Response 4.1.1, "Parks Service Level Master Response," changes to the parkland service level standard are no longer proposed. Please refer to Master Response 4.1.1.
- O8-8 The comment raises issues related to consistency of the proposed park service level standard with other goals and policies in the General Plan. As described in Master Response 4.1.1, "Parks Service Level Master Response," changes to the parkland service level standard are no longer proposed. Please refer to Master Response 4.1.1.
- O8-9 The commenter indicates that a reduction in parkland may reduce the tree canopy. As described in Master Response 4.1.1, "Parks Service Level Master Response," changes to the parkland service level standard are no longer proposed. Please refer to Master Response 4.1.1.
- O8-10 The comment raises issues with the proposed change to park service level standard. As described in Master Response 4.1.1, "Parks Service Level Master Response," changes to the parkland service level standard are no longer proposed. Please refer to Master Response 4.1.1.

RECEIVED

SEP 25 2014

Letter
09BY: D. Hung

Gary Collier
 Parker Homes neighborhood association
 PO 99 Tinker way
 Sacramento CA 95838
 916 649 1470

City planning Dept. re General plan amendment/Update

Dear S. Ms.:

I am greatly perturbed in that the city of Sacramento has failed despite being chastised @ a city council hearing for refusing to notify our neighborhood association, yet still refused to notify us of current events we are not listed on the cities page still of want neighborhood associations. Maybe the city does not want to hear about the neglect in our neighborhoods.

~~By~~ many years ago a dear friend to our community, a former council member by the name of Rob Korthig quite honorable I wish to add stated that our community was "the land that time forgot". Apparently the city still has no respect for previous decisions by the city council! Such an attitude is intolerable in a modern society.

Thankfully the city appears ready to ~~and~~ concede that some streets should not be expanded, as the current plan appears to concede. Perhaps the city can now address the problems of streets needing reconstruction in Parker Homes neighborhood.

09-1

2

We as a community raised supposedly \$12 million to assist with infrastructure needs as well as housing repairs for our community. No one @ou provide any credible information as to why we have the worst streets in the city, some of which haven't been reconstructed since their original construction in 1942. Yes for those who are mathematically impaired, that is more than 70 years by a comfortable edge, and yet the city council changes its mind after our former council members leave office. It is not our responsibility to raise Xtra monies to have them disappear without any oversight, we have heard that it was the Honorable Gray Davis a former Governor as well as former Governor Peter Wilson as well as well as the terminator and our current Governor. What we do not understand is how can we motivate our community to do any thing to help our community if we continue to be ignored, short of legal actions?

09-1
cont.

As far as parks ~~area~~ we would like to state our postage stamp park that supposedly replaces the original park should be expanded by another park on the other side of the freeway that now bisects our neighborhood.

09-2

Our neighborhood has one last request; do they still have our streets listed on the cities reconstruction List? After all, if they can forget about us and our community; perhaps they also forgot their obligation to their responsibilities to maintain the cities infrastructure.

09-3

Why is it the down town area gets more things than the rest of us taxpayers.

Why is it that downtown residents get there
Denafity & supposed needs met is succinct in that
they live downtown and do not need bus service
we have NO bus service any where near our
community. We have many people who have severe
disabilities and can't get to meetings at night
due to transportation & criminal behavior outside
of our neighborhood.

09-3
cont.

**Letter
09
Response****Parker Homes Neighborhood Association**
Gary Collier
9-25-14

-
- 09-1 The commenter identifies issues related to the City's notification process and responsiveness to issues. The comment does not raise environmental issues or issues related to the adequacy of the Draft MEIR, and no further response is necessary under CEQA. This comment will be provided to the decision makers for consideration; City staff's response to this comment will be included as an appendix to the staff report.
- 09-2 The commenter raises an issue with a specific park in the neighborhood. The comment does not raise environmental issues or issues related to the adequacy of the Draft MEIR, and no further response is necessary under CEQA. This comment will be provided to the decision makers for consideration; City staff's response to this comment will be included as an appendix to the staff report.
- 09-3 The commenter raises issues with street maintenance in the neighborhood. The comment does not raise environmental issues or issues related to the adequacy of the Draft MEIR, and no further response is necessary under CEQA. This comment will be provided to the decision makers for consideration; City staff's response to this comment will be included as an appendix to the staff report.

Letter
010

September 25, 2014

Scott Johnson, Associate Planner
City of Sacramento, Community Development Department
Environmental Planning Services
300 Richards Boulevard, 3rd Floor
Sacramento, CA 95811

RE: 2035 General Plan Update and Master Environmental Impact Report (MEIR) related to the expansion of the Level of Service (LOS) F to new roadways and Priority Investment Areas.

Dear Mr. Johnson:

Upper Land Park Neighbors (ULPN), a neighborhood association representing residents south of Broadway, west of Riverside, and south to 13th Avenue, submits the following comments on the General Plan and MEIR.

The General Plan Update includes major changes in City policies that relate to population growth and which will have significant impacts on the environment. The General Plan assumes a population of 640,000 in 20 years compared with today's population of 475,000, a growth rate of 35% (1.7 percent annually). The 2035 General Plan Master Environmental Impact Report (MEIR) compares the impact of the build-out of the amended General Plan to today's environment.

We are concerned about expanding the current traffic level of service (LOS) E and F threshold to city roadways abutting residential areas, and our neighborhood specifically. We agree street widening is not an acceptable alternative to more traffic; however, we are concerned that there is no assurance that significant traffic impacts on residential streets would be addressed in the process and the burden of proof would be placed on individual citizens to prove that negative traffic impacts should be addressed.

LOS E & F THRESHOLDS EXPANDED

The General Plan Update proposes to move the Core Area boundary from X Street to Broadway, which would allow a LOS F. In addition, the MEIR is adding Freeport Boulevard (LOS F) and Sutterville (LOS E), rather than the current City standard of LOS D. Designating these streets at LOS E and F conflicts with certain General Plan goals and policies to enhance the quality of life within existing neighborhoods and to reduce traffic and parking problems in residential neighborhoods.

General Plan Mobility Goal 4.3 states: "Neighborhood Traffic: Enhance the quality of life within existing neighborhoods through the use of neighborhood traffic management and traffic calming techniques, while recognizing the City's desire to provide a grid system that creates a high level of connectivity."

010-1

General Plan Mobility Goal M 4.3.1 Neighborhood Traffic Management states: "The City shall continue wherever possible to design streets and approve development applications in a manner as to reduce high traffic flows and parking problems within residential neighborhoods."

O10-1
cont.

The expansion of LOS E and F thresholds to roadways that abut residential neighborhoods is in direct conflict with the above two goals.

Encircling Upper Land Park and Land Park Residential Neighborhoods with LOS E AND F. Allowing Broadway, Freeport Blvd, and Sutterville Road to have a lower LOS thresholds would encircle the Upper Land Park and Land Park residential neighborhoods, resulting in significant traffic volumes on its residential streets. The higher traffic levels would be permanently permitted and the result will be increased traffic that would cause vehicles to the bypass congestion on these roadways and cut through numerous Upper Land Park and Land Park residential streets.

O10-2

Also, roadways which are allowed a LOS E and F threshold would not be required by CEQA to mitigate for the additional traffic from cut-through traffic or other impacts, e.g. public safety, that will certainly occur within Upper Land Park and Land Park. Staff indicates they would study roadway operations and safety of any development proposal to determine if a focused traffic study should be done. If Staff determines that there are issues that should be studied, a traffic study would be conducted and "conditions of approval" could be applied to take care of any impacts. However, there is no certainty that a traffic study would be required by staff. The burden would fall on residents, not the developer, to prove that a study should be conducted and conditions should applied.

O10-3

Priority Investment Areas: The General Plan Update also proposes to expand LOS F to existing Priority Investment Areas. ULPN's would like to ensure that the Upper Land Park Priority Investment Area, located south of Broadway and west of Riverside to I-5, is not included in this expansion. This area is currently being studied as part of a U.S. Housing and Urban Development (HUD) Choice Neighborhood Initiative (CNI) grant awarded to the Sacramento Housing Authority. The CNI grant has established a task force comprised of City Planning and Sacramento Housing and Redevelopment Agency staff, Upper Land Park Neighbors and other neighborhood associations, SHRA residents, and the Broadway business association. The CNI Task Force is currently looking at appropriate density levels and new in the street connections for this area in order to determine if the two SHRA developments at Alder Grove and Marina Vista (68 total acres) should be redeveloped. It would be premature to allow Upper Land Park Priority Investment Area to have a LOS F.

O10-4

Reclassify Vallejo Way. Finally, Vallejo Way from 5th Street to Riverside is still incorrectly identified as a minor collector which allows up to 7,825 ADT. This street is not physically capable of carrying that much traffic because its physical characteristics would not allow it. It is only 22 feet wide from 10th St to Riverside and has an "off-set" intersection at Riverside, making it difficult to travel east/west to connect

O10-5

Upper Land Park Neighbors
Comments on 2035 General Plan Update and MEIR

September 25, 2014
Page 3

In closing, Upper Land Park Neighbors requests that the City:

- 1) retain X Street as the southern boundary for the Core Area and allowing LOS F. Do not expand south to Broadway.
- 2) not allow a LOS F threshold for Freeport Blvd or a LOS E for Sutterville Road. Retain LOS D for these roadways. While we agree widening of these roads is not desirable, traffic impacts on residential streets must be studied and addressed if LOS drops below D.
- 3) ensure that Upper Land Park's Priority Investment Area *is not* included in the expanded use of LOS F.
- 4) reclassify Vallejo Way from a minor collector to a residential street

010-6

We appreciate your consideration of our comments and look forward to working with you and other decision-makers to address our concerns. If you have any questions, we can be reached at 916.447.3803 or lstetson2@earthlink.net.

Very truly yours,



Luree Stetson
Upper Land Park Neighbors

Letter 010 Response	Upper Land Park Neighbors Association Luree Stetson) 9-25-14
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- 010-1 The commenter states concern regarding the modification of Policy M 1.2.2 in the General Plan Update to include additional locations where LOS E and LOS F would be acceptable. The commenter goes on to state that these modifications conflict with neighborhood livability concerns. The commenter correctly states that the General Plan Update includes modifications to Policy M 1.2.2 that would result in additional roadway segments where LOS E and LOS F would be acceptable. Please refer to Master Response 4.1.2 for a detailed discussion regarding neighborhood livability and increase in traffic on neighborhood streets. The commenter also indicates that the proposed change in LOS would conflict with other policies. The issues with the internal policies do not raise issues with the adequacy of the Draft MEIR. However, these issues will be addressed in an appendix to the staff report provided to the decision makers for their consideration of project approval. No further response is necessary.
- 010-2 The commenter states concern regarding the modification of Policy M 1.2.2 in the General Plan Update to allow worse levels of service on key roadways surrounding Land Park, including Broadway, Freeport Boulevard, and Sutterville Road. The commenter goes on to state that higher traffic levels on these streets would result in additional cut-through traffic. The City recognizes that the appropriate level of traffic on a given roadway varies depending upon its role in the transportation system. The roadways listed by the commenter are designated as arterials, and are therefore designed to handle higher levels of traffic. This comment does not raise issues or concerns regarding the adequacy, accuracy, or completeness of the environmental document. Regarding, cut-through traffic on neighborhood streets, please refer to Master Response 4.1.2 for additional information.
- 010-3 The commenter states that City staff make determinations regarding whether or not a project requires a traffic study, and that traffic studies may contain conditions of approval that alleviate project impacts. This comment is generally accurate; however, City staff does not arbitrarily select which projects undergo traffic studies. They follow guidelines to determine whether a project is likely to alter traffic operations such that adjustment is required. It is important to note that a project may be exempt from traffic evaluation under CEQA, but may still be required to undergo a traffic study. It is also important to note that traffic-related conditions of approval are often applied to projects outside of the CEQA process. The comment does not raise issues with the adequacy of the Draft MEIR. No further response is necessary.
- 010-4 The commenter states that the General Plan Update would expand areas where LOS F is acceptable to include Priority Investment Areas, and requests that the planned redevelopment of areas located in Upper Land Park not be included as part of this designation. The planned redevelopment of the Alder Grove and Marina Vista developments are not included within the boundaries of any of the three Priority Investment Areas evaluated as part of the General Plan Update. The comment does not raise issues related to the adequacy of the Draft MEIR. No further response is necessary.
- 010-5 The commenter states that Vallejo Way should not be classified as a minor collector between 5th Street and Riverside Boulevard. The City considers this segment of Vallejo Way to be a minor collector as it is the only east-west roadway located south of Broadway that provides a direct connection between the public segment of 5th Street (5th Street is closed to through traffic south of Vallejo Way) and Riverside Boulevard (which is a major collector), and, therefore, serves a critical role in providing access and mobility in the northwestern portion of the Land Park neighborhood. Vallejo Way is correctly classified as a minor collector in the Draft MEIR Circulation Diagram (Exhibit 4.12-1).

O10-6 The commenter reiterates previous comments. Please refer to responses to comments O10-1 through O10-6. The commenter also specifically calls upon the City to retain X Street as the southern boundary of the Core Area identified in Policy M 1.2.2, and not to adjust this boundary to Broadway. The modification of Policy M 1.2.2 to extend the Core Area south by one block to Broadway recognizes the multimodal nature of the Broadway corridor, because it is a critical street for all modes of transportation including pedestrians, bicyclists and transit. Broadway is served by the busiest bus route in the Regional Transit (RT) system (Route 51), and contains the Broadway Light Rail Station. The City recognizes that maintaining lower levels of vehicle delay on this corridor may conflict with goals to improve conditions for other travel modes and may limit the viability of potential streetscape modifications designed to improve conditions for pedestrians, bicyclists, and transit riders. Public comments received during the course of the General Plan Update indicated support for this modification. For these reasons, Policy M 1.2.2 was modified as part of the General Plan Update to include Broadway as part of the Core Area.

Letter
011

WOODLAKE NEIGHBOR S CREATING TRANSPARENCY

September 25, 2014

P.O. Box15564, Sacramento CA 95852

September 25, 2014

Scott Johnson, Associate Planner
City of Sacramento
Community Development Department
Environmental Planning Services
300 Richards Boulevard
Third Floor Sacramento, CA 95811
SRJohnson@cityofsacramento.org
(916) 808-5842

Dear Mr. Johnson:

Woodlake Neighbors Creating Transparency would like to comment on aspects of the General Plan Update 2035 as follows. Because of proximity to the American River and the inadequacy of existing flood control measures, our primary concern is Flood Protection. Mobility and traffic flow through the Woodlake community is our second major concern. We offer comments on the inclusion of Urban Agriculture as well.

Flood Protection

While the General Plan addresses flooding, the primary focus is on the dam and levee system and maintenance of existing natural channel floodplain storage areas. The Policies fail to address the need to maintain, repair or replace the existing street drainage infrastructure terminating at the various sump pumps throughout the city. The General Plan identifies only 3 areas within the City that are prone to flooding. This is an understatement and contrary to city and county records. Historically there are at least 7 major areas in the city that are known to flood during 5 to 10-year events. Several of these areas have records of causing extensive damage to property. It is also a matter of record that the street drainage system in many areas is in need of maintenance or replacement. In some cases the existing infrastructure is inadequate and not designed to handle the volume of water that is shed by the existing development that has occurred within the drainage basin. This puts a hamper upon further development resulting in a loss of economic development. Without addressing the need for improvements in the existing drainage basin infrastructure the General Plan will fail to ultimately provide a 200-year level of flood protection.

011-1

Mobility

A primary concern about traffic mobility pertains to Canterbury Road, in the Woodlake neighborhood, where an average of 3,500 to 4,000 commuting autos exiting Highway 160 pass

011-2

by the Canterbury/Southgate corner, apparently taking a detour to the Natomas neighborhood, Monday through Friday. The addition of the Arden Garden Connector years back assured Woodlake neighbors that commuter traffic would take Royal Oaks to Arden Way towards Natomas. This has not been the case, and traffic flow through Woodlake needs to be revisited. This issue will have to be undertaken at some time using a more immediate planning timeline.

O11-2
cont.

A second major concern is about the way traffic is obstructed when driving through midtown Sacramento. Barriers are placed preventing traffic to flow freely through certain streets, forcing drivers to zigzag from street to street. This may cause drivers to use more gasoline, countering climate control features of the General Plan Update, 2035.

O11-3

Urban Agriculture

The 2030 General Plan did not address urban agriculture and focused only on preserving existing agricultural land in the perimeter of the city. Woodlake Neighbors support the development of policies in the 2035 General Plan Update that promote urban agriculture to enhance the quality of life of urban residents, including those who do not have ready access to healthy foods. Our specific concerns follow and are emphasized by italics and bold lettering.

O11-4

-Promote urban agriculture with zoning provisions that support production, distribution, and sale of locally grown foods, particularly in areas that have vacant or underutilized land. *Roadside or yard sale stands should respect esthetics of neighborhoods.*

-Allow urban farms and market gardens at a *scale* that is appropriate to Sacramento’s neighborhoods, particularly in areas that lack access to fresh healthy foods, and have vacant or underutilized land.

We ask that the City work with Woodlake Neighbors Creating Transparency to focus on concerns outlined here and to further develop and implement other features of the General Plan Update, 2035.

Sincerely,



Jane Macaulay, President

<p>Letter O11 Response</p>	<p>Woodlake Neighbors Creating Transparency Jane Macaulay, President 9-25-14</p>
-------------------------------------------	-------------------------------------------------------------------------------------------------

- O11-1 The commenter raises issues related to flooding and flood protection and indicates that the policies fail to address maintenance of drainage infrastructure and understate the flooding potential within the city. The commenter seeks to associate drainage/local flooding issues with potential for regional-scale, 200-year flooding caused by levee/dam failure. The proposed 2035 General Plan includes several policies associated with maintenance of drainage facilities:
- ▲ **Policy U 1.1.1:** Provision of Adequate Utilities. The City shall continue to provide and maintain adequate water, wastewater, and stormwater drainage utility services to areas in the city, and shall provide and maintain adequate water, wastewater, and stormwater drainage utility services to areas in the city that do not currently receive these City services upon funding and construction of necessary infrastructure.
 - ▲ **Policy U 1.1.2:** Citywide Level of Service Standards. The City shall establish and maintain service standards [Levels of Service (LOS)] for water, wastewater, stormwater drainage, and solid waste services.
 - ▲ **Policy U 1.1.6:** Infrastructure Finance. The City shall develop and implement a financing strategy and assess fees to construct needed water, wastewater, stormwater drainage, and solid waste facilities to maintain established service levels and to mitigate development impacts to these systems (e.g., pay capital costs associated with existing infrastructure that has inadequate capacity to serve new development). The City shall also assist developers in identifying funding mechanisms to cover the cost of providing utility services in infill areas.
 - ▲ **Policy U 4.1.2:** Master Planning. The City shall implement a master plan program to:
 - identify facilities needed to prevent 10-year event street flooding and 100-year event structure flooding;
 - ensure that public facilities and infrastructure are designed pursuant to approved basin master plans;
 - ensure that adequate land area and any other elements are provided for facilities subject to incremental sizing (e.g., detention basins and pump stations); and
 - consider the use of “green infrastructure” and Low Impact Development (LID).
 - ▲ **Policy U 4.1.3:** Regional Stormwater Facilities. The City shall coordinate efforts with Sacramento County and other agencies in the development of regional stormwater facilities.
- The comment relates to proposed 2035 General Plan policies and does not raise issues regarding the adequacy of the Draft MEIR. No further response is necessary.
- O11-2 The commenter voices concern regarding traffic levels on Canterbury Road in the Woodlake neighborhood, and states that “[t]his issue will have to be undertaken at some time using a more immediate planning timeline.” The comment does not raise environmental issues or issues related to the adequacy of the Draft MEIR, and no further response is necessary under CEQA. This comment will be provided to the decision makers for consideration; City staff’s response to this comment will be included as an appendix to the staff report.

- 011-3 The commenter voices concern regarding traffic calming measures (presumably half-street closure) present in portions of the Midtown neighborhood that result in longer trip lengths and increased motor vehicle emissions. This comment does not raise issues or concerns regarding the adequacy, accuracy, or completeness of the environmental document. The comment will be provided to the decision makers for their consideration.
- 011-4 The commenter provides recommended revisions to the proposed urban agriculture policies in the 2035 General Plan. The comment does not raise environmental issues or issues related to the adequacy of the Draft MEIR, and no further response is necessary under CEQA. This comment will be provided to the decision makers for consideration; City staff's response to this comment will be included as an appendix to the staff report.



Letter
012

MIWOK United Auburn Indian Community
MAIDU of the Auburn Rancheria

Gene Whitehouse
Chairman

John L. Williams
Vice Chairman

Danny Rey
Secretary

Brenda Adams
Treasurer

Calvin Moman
Council Member

September 16, 2014

Scott Johnson
City of Sacramento
300 Richards Blvd
Sacramento, CA 95811

Subject: Notice of Availability - Draft Master EIR for the City of Sacramento 2035 General Plan Update (LR12-003)(SCH#: 2012122006)

Dear Scott Johnson,

Thank you for providing additional information regarding the above referenced project. The United Auburn Indian Community (UAIC) of the Auburn Rancheria is comprised of Miwok and Southern Maidu (Nisenan) people whose tribal lands are within Placer County and whose service area includes El Dorado, Nevada, Placer, Sacramento, Sutter, and Yuba counties. The UAIC is concerned about development within its aboriginal territory that has potential to impact the lifeways, cultural sites, and landscapes that may be of sacred or ceremonial significance. We appreciate the opportunity to comment on this and other projects in your jurisdiction.

We are currently reviewing the information provided by your agency in order to ascertain whether the project could affect cultural resources that may be of importance to the UAIC. Please continue to send us copies of the proposed project's environmental documents so that we have the opportunity to comment on potential impacts and proposed mitigation measures related to cultural resources. The information gathered will provide us with a better understanding of the project and the cultural resources on site and is invaluable for consultation purposes. Finally, please contact us if you find any Native American cultural resources in, or around, your project area.

012-1

Thank you again for taking these matters into consideration, and for involving the UAIC in the planning process. We look forward to reviewing the additional documents requested. Please contact Marcos Guerrero, Cultural Resources Manager, at (530) 883-2364 or email at mguerrero@auburnrancheria.com if you have any questions.

Sincerely,

Gene Whitehouse,
Chairman

CC: Marcos Guerrero, CRM

Tribal Office 10720 Indian Hill Road Auburn, CA 95603 (530) 883-2390 FAX (530) 883-2380



MIWOK
MAIDU United Auburn Indian Community
of the Auburn Rancheria

Tribal Office
10720 Indian Hill Road
Auburn, CA 95603

9581190218 0560



Scott Johnson
City of Sacramento
300 Richards Blvd
Sacramento, CA 95811

COMMUNITY DEVELOPMENT
DEPARTMENT

OCT 08 2014

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**Letter
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Response**

United Auburn Indian Community of the Auburn Rancheria
Gene Whitehouse, Chairman
10-8-14

- 012-1 The commenter expresses concern regarding development within aboriginal territory and requests that the United Auburn Indian Community (UAIC) of the Auburn Rancheria continue to be provided copies of environmental documents and that the UAIC be contacted if any Native American cultural resources are found. Draft MEIR Section 4.4, "Cultural Resources," evaluates potential impacts related to archaeological resources and human remains. The comment does not raise issues related to the adequacy of the Draft MEIR. City staff will continue to provide the UAIC with notice of environmental documents. The UAIC is included on the list of contacts if cultural resources are discovered. In addition, the City continues coordinate with Native American groups, including the UAIC, to improve efforts of project review with Native American groups. No further response is necessary.

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5 CORRECTIONS AND REVISIONS TO THE DRAFT MEIR

The City of Sacramento prepared a Final Master EIR that included all written comments received regarding the Draft Master EIR, including Chapter 5, changes to the text of the proposed 2035 General Plan and Master EIR that had been made following the public comment review period. The Final EIR was posted to the City’s web site (<http://portal.cityofsacramento.org/Community-Development/Planning/Environmental/Impact-Reports>) as part of this process.

Since the preparation of the Final Master EIR the City has identified additional changes in general plan policies that will be proposed. This Restated Chapter 5 includes an updated discussion of the proposed changes and their relationship to the Master EIR. Chapter 5 has been restated in its entirety. The text presented here does not identify changes that have been made to the original Chapter 5. As in the original Chapter 5, changes to the Draft Master EIR identified below are shown in double underline for additions and ~~strikethrough~~ for deletions.

This chapter presents specific text changes made to the Draft MEIR since its publication and public review. These revisions include both staff-initiated text changes and text modifications in response to public comments made on the Draft MEIR (see Chapter 4, “Draft MEIR Comments and Responses”). The text revisions contain clarification, amplification, and corrections that have been identified since publication of the Draft MEIR.

The changes are presented in the order they appear in the original Draft MEIR and are identified by the Draft MEIR page number. Text deletions are shown in strikethrough (~~strikethrough~~), and text additions are shown in double underline (double underline). None of the changes identified below would alter the conclusions of the Draft MEIR.

5.1 REVISIONS TO “EXECUTIVE SUMMARY”

Page ES-1 of the “Executive Summary” is revised as follows to reflect the change in previously proposed parkland service level standard to retain the currently adopted standard:

- ~~**Update Parkland Service Level Goals:** The current park acreage service level goal of 5 acres per 1,000 residents exceeds what the City provides. Currently, the citywide average is 3.4 acres per 1,000 residents and lower in the Central City. The 2035 General Plan adjusts parkland dedication requirements to maintain feasible levels of actual parkland availability.~~

Staff noticed a typo in the second row in Table ES-1 on page ES-14, which is revised as follows:

4.12-3: Potential adverse effects to roadway segments located in adjacent jurisdictions resulting from planned development under the 2035 General Plan, such that the jurisdictions minimum acceptable level-of-service thresholds are not met.	None	Policies M 1.2.2, M 1.3.1, M 1.3.2, M 1.3.3, M 1.3.5, M 1.3.6, M 1.4.1, and M 1.4.2.	S	4.12-1 Widen 47th Avenue from 4 to 6 Lanes.	SU
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5.2 REVISIONS TO CHAPTER 1, “INTRODUCTION”

The first two sentences of the fourth paragraph in Section 1.8, “Public Review of Draft MEIR and Lead Agency Contact,” on page 1-6 are revised as follows:

The public review and comment period is 45 days, from ~~August 11~~July 18, 2014 through September 25, 2014. All written public comments on the Draft MEIR must be received no later than 5:00 p.m. on ~~Thursday Tuesday~~, September 25, 2014.

5.3 REVISIONS TO CHAPTER 2, “PROJECT DESCRIPTION”

Page 2-8 is revised as follows to reflect the change in previously proposed parkland service level standard to retain the currently adopted standard:

- ~~Update Parkland Service Level Goals. The current park acreage service level goal of 5 acres per 1,000 residents exceeds what the City provides. Currently, the citywide average is 3.4 acres per 1,000 residents and lower for the Central City. The 2035 General Plan adjusts parkland dedication requirements to maintain feasible actual parkland availability.~~

Page 2-24 is revised as follows to reflect the change in previously proposed parkland service level standard to retain the currently adopted standard:

- ~~Develop and maintain 1.75 acres (per 1,000 population) of neighborhood and community parks within the Central City and 3.5 acres (per 1,000 population) of neighborhood and community parks outside the Central City. (ERC 2.2.4) These goals differ from the goals established by the 2030 General Plan, which were 5 acres of neighborhood and community parks and recreational facilities per 1,000 population for the entire city.~~

The Project Description in the Draft MEIR discusses subsequent projects. See Table 2-2 beginning at page 2-28 of the Draft Master EIR. The California Environmental Quality Act (CEQA) (PRC §21157[b] and CCR §15176[b]) requires a Master EIR to identify subsequent projects that are anticipated to be undertaken during the time the general plan is in effect. Inclusion of a project in the table does not indicate that the particular project has been formally approved, designed, or funded. Future approval of projects identified in Table 2-2 would require project-specific environmental review under CEQA. Table 2-2 includes a reference to the Sacramento River Crossing and refers to potential crossings at Broadway, Marina View, or Sutterville Roads. Sutterville Road was included in the potential locations because it has appeared in the Metropolitan Transportation Plan (MTP), the regional master planning document that is the basis for long-range transportation planning. The City Council has, however, concluded that any future crossing would not be located at Sutterville Road. See City Council Resolution No. 2011-577.

Table 2-2 of the Draft MEIR is hereby corrected to exclude the reference to Sutterville Road:

Table 2-2 City Of Sacramento 2035 General Plan Subsequent Projects				
Name	Location	PIA	Description	Budget/Funding
Sacramento River Crossing	Either Broadway or Marina View, or Sutterville Road	CBD	New Southern Bridge: from Sacramento to West Sacramento across the Sacramento River. Includes: auto, transit, bicycle and pedestrian facilities. The Sacramento River Crossings Alternatives Study analyzed a new crossing at either Broadway or Marina View, or Sutterville Road, but final alignment options will be studied in subsequent planning efforts.	\$251,423,681

Although it was identified in Table 2-2, the Sutterville Road River Crossing was not included in the traffic model prepared for the Draft MEIR. Therefore, deletion of Sutterville Road from the potential locations of river crossings does not affect the Draft Master EIR’s impact analysis for transportation. This change is a

minor clarification to the Draft Master EIR's project description and does not constitute substantial new information.

5.3.1 Changes to 2035 General Plan Text Not Stated in the Draft MEIR:

After release of the public Draft Master EIR, additional edits were made as a part of the ongoing policy refinement process to some proposed 2035 General Plan policies and other text that were not specifically stated in the Draft Master EIR project description or elsewhere in the Draft Master EIR. These edits are now included in the proposed 2035 General Plan. The changes to 2035 General Plan policy and text are described below. These changes do not alter the Draft Master EIR analysis and conclusions.

City staff inserted the following introductory paragraph on page 1-1 of the 2035 General Plan in order to provide additional clarity regarding general plan consistency determinations:

The City, in its sole discretion, shall determine a proposed project's consistency with the City's General Plan. Consistency is achieved if a project will further the overall objectives and policies of the General Plan and not obstruct their attainment, recognizing that a proposed project may be consistent with the overall objectives of the General Plan, but not with each and every policy thereof. In all instances, in making a determination of consistency, the City may use its discretion to balance and harmonize policies with other complementary or countervailing policies in a manner that best achieves the City's overall goals.

City staff, in response to direction from Planning and Design Commission, revised General Plan Policy ER 3.1.2, as follows, to provide a policy mechanism for monitoring and maintenance of the tree canopy:

ER 3.1.2 Manage and Enhance the City's tree canopy. The City shall continue to plant new trees, ensure new developments have sufficient right-of-way width for tree plantings, manage and care for all publicly owned trees, and work to retain healthy trees. The City shall monitor, evaluate and report, by community plan area and city wide, on the entire tree canopy in order to maintain and enhance trees throughout the City and to identify opportunities for new plantings. (RDR/MPSP/SO)

City staff initiated the following revision to Policy LU 4.5.5 to provide flexibility related to provision of transit stops. Regional Transit is the responsible agency who normally plans the location of transit stops depending on transit demand and supply within the project vicinity:

LU 4.5.5 Connections to Transit. The City shall ~~require~~ encourage new neighborhoods to include transit stops that can be connected to and support a citywide transit system and are within a ½-mile walking distance of all dwellings. (RDR/MPSP)

5.4 REVISIONS TO SECTION 4.3, "BIOLOGICAL RESOURCES"

The text in Table 4.3-1 on page 4.3-4 of the Draft MEIR is revised as follows:

Nests primarily in ~~riparian~~ large trees and forages in open fields (annual grasslands, fallow fields, dry and irrigated pasture). Most nesting recorded along the Sacramento River.

The text on page 4.3-9 of the Draft MEIR is revised as follows:

- ▲ **Policy ER 3.1.3: Trees of Significance.** The City shall require the retention of City trees and Heritage Trees by promoting stewardship of such trees and ensuring that the design of

development projects provides for the retention of these trees wherever possible. Where tree removal cannot be avoided, the City shall require tree replacement or appropriate remediation. (RDR/MPSP)

5.5 REVISIONS TO SECTION 4.7, “HYDROLOGY AND WATER QUALITY”

After release of the Draft Master EIR, City staff revised Policy EC 2.1.11 to provide clarity regarding broader consistency with State laws requiring 200-year flood protection. This revision ensures consistency with State law requiring 200-year flood protection and does not alter the effectiveness of this policy for regulating new development with respect to flood protection.

- ▲ **Policy EC 2.1.11:** New Development. The City shall require evaluation of potential flood hazards prior to approval of development projects and shall regulate development in urban and urbanizing areas per state law addressing 200-year level of flood protection. ~~to determine whether the proposed development is reasonably safe from flooding and consistent with California Department of Water Resources (DWR) Urban Level of Flood Protection Criteria. The City shall not approve new development or a subdivision or enter into a development agreement for any property within a flood hazard zone unless the adequacy of flood protection specific to the area has been demonstrated.~~

After release of the Draft Master EIR City staff determined that Policy EC 2.1.17 should be removed because ownership is not necessary, and instead the City will acquire an easement as part of private development applications. The text on page 4.7-10 of the Draft Master EIR is deleted as follows:

- ▲ ~~**Policy EC 2.1.17:** Dedication of Levee Footprint. The City shall require new development adjacent to a levee to dedicate the levee footprint in fee to the appropriate public agency.~~

After release of the Draft MEIR City staff revised Policy EC 2.1.20 (formerly EC 2.1.21) to apply more broadly than to just the roadway system in areas protected by levees.

- ▲ **Policy EC 2.1.20:** Roadway Systems as Escape Routes. The City shall require that ~~roadway systems~~ for areas protected from flooding by levees be designed to provide multiple escape routes for residents and access for emergency services in the event of a levee or dam failure.

Due to the revisions made to Policy EC 2.1.11, the Draft MEIR discussion under Impact 4.7-3 (p. 4.7-17) also requires text revision to maintain consistency with the revised policy text. Page 4.7-17 is hereby revised as follows:

Government Code Section 65302 further requires that general plans establish a set of comprehensive goals, policies, and feasible implementation measures to avoid or minimize the risk of flooding, especially to new development and essential public facilities. The Environmental Constraints Element includes Goal EC 2.1, Policies EC 2.1.1 through EC 2.1.28, and Implementation Programs 2 through 9. These goals, policies, and implementation measures minimize flood-related impacts to existing and new city residents and essential public facilities. Most notably, Policy EC 2.1.13 requires the City to work with SAFCA to achieve by 2025 local-certification of levees for 200-year flood protection. And Policy EC 2.1.11 requires evaluation of potential flood hazards prior to City approval of development projects ~~in order to determine whether the~~ and regulation of proposed development is ~~reasonably safe from flooding and~~ for flood protection consistent with State law, including but not limited to DWR Urban Level of Flood Protection Criteria, which is the level of protection that is necessary to withstand a 200-year flood. ~~The policy goes on to state that the City shall not approve new development or a subdivision or enter into a development agreement for any property within a flood hazard zone unless the adequacy of flood protection specific to the area has been demonstrated.~~

In addition, the influence of global climate change, including sea level rise and potential changes in precipitation rates and snow pack, will alter flood risks in the future. Although it is not possible to predict the specific changes to flood risk in the Sacramento River Basin that may occur, flood risk will likely increase, because of an greater potential for conditions that are conducive to occasional, large rain events. To address these risks, the 2035 General Plan includes Policy EC 2.1.28, which requires the City to partner with relevant organizations and agencies when updating critical flood plans (including FEMA and DWR flood hazard maps; the City’s Comprehensive Flood Management Plan; and the County-wide Local Hazard Mitigation Plan) to consider of the impacts of urbanization and climate change on long-term flood safety and long-term flood event probabilities.

As described above, policies proposed under the 2035 General Plan include levee requirements, new development evaluations, and regional flood management planning efforts (Policies EC 2.1.1 through 2.1.28). Development projects would not be approved unless flood risk is consistent with ~~plans that are aimed to provide~~ State law requirements related to a 200-year flood protection standard for the entire city (Policy EC 2.1.11) and would be consistent with on-going planning associated with the CVFPB, as well as on-going planning to address flooding-related effects of Global Climate Change. As a result, the flood risk impacts would be **less than significant**.

Mitigation Measure

None required.

Because revisions to Policy 2.1.11 do not diminish the effectiveness of the policy and ensure consistency with State law requiring 200-year flood protection, the text changes to the Draft Master EIR analysis do not alter the conclusions of the Draft MEIR. No new significant impact or substantial increase in the significance of an impact would result; therefore, these minor text changes do not constitute substantial new information.

5.6 REVISIONS TO SECTION 4.8, “NOISE AND VIBRATION”

The text on page 4.8-2 (last paragraph) of the Draft Master EIR is revised as follows:

In ~~2004~~2013, the California Department of Transportation (Caltrans) ~~published~~ updated the Transportation and Construction-Induced Vibration Manual...

The source of Table 4.8-1 on page 4.8-2 of the Draft Master EIR is revised as follows:

Section 4.8 “Noise and Vibration”: p. 4.8-2 (Table 4.8-1): Source: Caltrans ~~2004~~2013

5.7 REVISIONS TO SECTION 4.9, “PARKS AND RECREATION”

Draft Master EIR Section 4.9, “Parks and Recreation,” is revised to reflect the change in previously proposed parkland service level standard to retain the currently adopted standard. Revised Section 4.9 is provided in its entirety at the end of this chapter under heading 5.11. Other text changes described in Chapter 4 have also been included in revised Section 4.9, including changes directed by Planning and Design Commission.

5.8 REVISIONS TO SECTION 4.12, “TRANSPORTATION AND CIRCULATION”

Following circulation of the Draft Master EIR, the Governor’s Office of Planning and Research released a draft document (Updating Transportation Impact Analysis in the CEQA Guidelines). This document includes potential amendments to the CEQA Guidelines related to traffic thresholds of significance, which may utilize

a threshold based on vehicle miles traveled (VMT). In anticipation of the potential amendment the Guidelines, City staff is revising Section 4.12 of the Draft Master EIR to provide VMT information in order to better inform future decisions related to projects that are consistent with the general plan. These changes provide information that was used for the Master EIR’s climate change analysis and is therefore not new information, but provides additional clarity for traffic-related VMT discussions.

The text on page 4.12-3 and 4.12-4 is revised as follows (although not shown below, this change requires renumbering of all subsequent tables):

Vehicular Roadway System

The transportation analysis for the roadway system followed the methodology described below. Daily conditions were evaluated for 260 roadway segments located throughout the city and in adjacent jurisdictions.

Detailed land use forecasts established allocations of future land uses for both the 2035 No Project and 2035 General Plan scenarios by transportation analysis zone (TAZ) for year 2035 conditions. The 2035 General Plan land use forecasts within the City maintain consistency with the citywide growth projections developed by SACOG and incorporated into the Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS) for the region. The TAZs represent geographic areas used to organize land use input data for the regional travel demand model (TDM). The TAZs are defined by natural borders, such as roads, waterways, and topography, and typically represent areas of relatively homogenous travel behavior. The 2035 General Plan land use forecasts refined the allocation of growth to the TAZ system within the City based upon projected development patterns between existing conditions and year 2035.

As part of the 2035 General Plan update, modifications were made to the land use and mobility elements. These changes resulted in the planned VMT growth reported in Table 4.14-1 below. This VMT is based on trips that have origins or destinations in the City. Consistency with the general plan for mobility and climate change purposes shall be based on the results in Table 4.14-1.

	<u>2005</u>	<u>2008</u>	<u>2011</u>	<u>2020</u>	<u>2035</u>	<u>2050</u>
<u>Population^{1,2,3}</u>	<u>457,837</u>	<u>457,702</u>	<u>472,178</u>	<u>528,866</u>	<u>640,381</u>	<u>751,896</u>
<u>Employment³</u>		<u>299,732</u>		<u>324,027</u>	<u>390,112</u>	<u>456,197</u>
<u>Housing^{2,3}</u>	<u>178,699</u>	<u>192,352</u>	<u>190,911</u>	<u>219,110</u>	<u>260,699</u>	<u>302,288</u>
<u>VMT^{1,4}</u>	<u>11,439,120</u>	<u>11,245,084</u>	<u>11,600,739</u>	<u>12,588,131</u>	<u>14,233,785</u>	<u>15,879,439</u>
<u>VMT/capita</u>	<u>25.0</u>	<u>24.6</u>	<u>24.6</u>	<u>23.8</u>	<u>22.2</u>	<u>21.1</u>

Notes: VMT = vehicle miles traveled estimated using SACMET travel demand model calculated according to “Origin-Destination” method. Data for 2020 and 2050 were interpolated and extrapolated, respectively, based on the remaining dataset.

Sources:
¹ City of Sacramento 2012.
² US Census Bureau 2013.
³ Mintier Hamish 2013.
⁴ Fehr & Peers 2014.

City staff also identified revisions to mobility Policy M 1.2.2 to provide better consistency with the City traffic evaluation process and to provide flexibility in circumstances for which maintenance of LOS standards are determined to be infeasible or in conflict with other City goals. Policy M 1.2.2 is generally used as the basis for the City’s LOS standards and therefore provides one basis for the Draft Master EIR threshold of significance for traffic. As part of the change to Policy M 1.2.2, the basic policy concept expressed in Policy 1.2.5 to limit expansion of the physical capacity of the roadway system, is moved to Policy M 1.2.2 and

Policy 1.2.5 has been deleted to eliminate redundancy. Volume-to-capacity (v/c) ratios identified in Policy 1.2.2 are removed because City staff determined that the v/c ratios are extraneous with respect to the LOS standards identified. For this reason, Policy M 1.2.6, which refers to the v/c ratios in Policy 1.2.2, is also removed. To reflect the change to General Plan Policy M 1.2.2, Policy M 1.2.5, and Policy M 1.2.6 on pages 4.12-8, 4.12-11, and 4.12-12 are hereby revised, as follows:

- ▲ **Policy M 1.2.2.** Level of Service (LOS) Standard. The City shall implement a flexible context-sensitive Level of Service (LOS) standard, and will measure traffic operations against the vehicle LOS thresholds established in this policy. The City will measure Vehicle LOS based on the methodology contained in the latest version of the *Highway Capacity Manual* (HCM) published by the Transportation Research Board. The City's specific vehicle LOS thresholds have been defined based on community values with respect to modal priorities, land use context, economic development, and environmental resources and constraints. As such, the City has established variable LOS thresholds appropriate for the unique characteristics of the City's diverse neighborhoods and communities. The City will strive to operate the roadway network at LOS D or better for vehicles during typical weekday conditions, including AM and PM peak hour ~~conditions~~ with the following exceptions described below and mapped on Figure M-1:

A. Core Area (Central City Community Plan Area) - LOS F allowed

B. Priority Investment Areas - LOS F allowed

C. LOS E Roadways - LOS E is allowed for the following roadways because expansion of the roadways would cause undesirable impacts or conflict with other community values.

- 65th Street: Elvas Avenue to 14th Avenue
- Arden Way: Royal Oaks Drive to I-80 Business
- Broadway: Stockton Boulevard to 65th Street
- College Town Drive: Hornet Drive to La Rivera Drive
- El Camino Avenue: I-80 Business to Howe Avenue
- Elder Creek Road: Stockton Boulevard to Florin Perkins Road
- Elder Creek Road: South Watt Avenue to Hedge Avenue
- Fruitridge Road: Franklin Boulevard to SR 99
- Fruitridge Road: SR 99 to 44th Street
- Howe Avenue: El Camino Avenue to Auburn Boulevard
- Sutterville Road: Riverside Boulevard to Freeport Boulevard

LOS E is also allowed on all roadway segments and associated intersections located within ½ mile walking distance of light rail stations.

D. Other LOS F Roadways - LOS F is allowed for the following roadways (~~up to the identified volume/capacity ratio shown below~~) because expansion of the roadways would cause undesirable impacts or conflict with other community values.

- 47th Avenue: State Route 99 to Stockton Boulevard (~~V/C: 1.01~~)
- Arcade Boulevard: Marysville Boulevard to Roseville Road (~~V/C: 1.27~~)
- Carlson Drive: Moddison Avenue to H Street (~~V/C: 1.50~~)
- El Camino Avenue: Grove Avenue to Del Paso Boulevard (~~V/C: 1.01~~)
- Elvas Avenue: J Street to Folsom Boulevard (~~V/C: 1.35~~)
- Elvas Avenue/56th Street: 52nd Street to H Street (~~V/C: 1.04~~)
- Florin Road: Havenside Drive to Interstate 5 (~~V/C: 1.03~~)
- Florin Road: Freeport Boulevard to Franklin Boulevard (~~V/C: 1.06~~)
- Florin Road: Interstate 5 to Freeport Boulevard (~~V/C: 1.01~~)
- Folsom Boulevard: 47th Street to 65th Street (~~V/C: 1.26~~)
- Folsom Boulevard: Howe Avenue to Jackson Highway (~~V/C: 1.20~~)
- Folsom Boulevard: US 50 to Howe Avenue (~~V/C: 1.64~~)

- Freeport Boulevard: Sutterville Road (North) to Sutterville Road (South) (V/C: 1.05)
- Freeport Boulevard: 21st Street to Sutterville Road (North) (V/C: 1.23)
- Freeport Boulevard: Broadway to 21st Street (V/C: 1.08)
- Garden Highway: Truxel Road to Northgate Boulevard (V/C: 2.22)
- H Street: Alhambra Boulevard to 45th Street (V/C: 1.08)
- H Street 45th: Street to Carlson Drive (V/C: 1.53)
- Hornet Drive: US 50 Westbound On-ramp to Folsom Boulevard (V/C: 1.06)
- Howe Avenue: US 50 to Fair Oaks Boulevard (V/C: 1.47)
- Howe Avenue: US 50 to 14th Avenue (V/C: 1.05)
- Raley Boulevard: Bell Avenue to Interstate 80 (V/C: 1.06)
- South Watt Avenue: US 50 to Kiefer Boulevard (V/C: 1.19)
- West El Camino Avenue: Northgate Boulevard to Grove Avenue (V/C: 1.14)

E. If maintaining the above LOS standards would, in the City's judgment, be infeasible and/or conflict with the achievement of other goals, LOS E or F conditions may be accepted provided that provisions are made to improve the overall system, promote non-vehicular transportation, and/or implement vehicle trip reduction measures as part of a development project or a city-initiated project. Additionally the City shall not expand the physical capacity of the planned roadway network to accommodate a project beyond that identified in Figure M4 and M4a (2035 General Plan Roadway Classification and Lanes).

- ~~➤ **Policy M 1.2.5: Ultimate Roadway Network.** If development projects would cause or exacerbate unacceptable LOS E or F conditions, the City shall not expand the physical capacity of the planned roadway network to accommodate the project beyond that identified in Figure M4 and M4a (2035 General Plan Roadway Classification and Lanes). To maintain acceptable LOS E or F conditions, the City may require applicable vehicle trip reduction measures and physical improvements that increase transit use, bicycling, or walking and traffic operational improvements.~~
- ~~➤ **Policy M 1.2.6: Maximum Volume/Capacity Ratios.** The City shall limit the application of the maximum daily volume/capacity ratios identified in Policy 1.2.2 to development projects requiring a General Plan Amendment.~~

To remain consistent with Policy M 1.2.2, the Draft MEIR Thresholds of Significance (pp. 4.12-17 through 4.12-19) are also hereby revised as follows:

THRESHOLDS OF SIGNIFICANCE

One of the policy changes in the proposed 2035 General Plan Update is the modification of Policy M 1.2.2 relating to level of service (LOS). This policy calls for the City to implement a flexible context-sensitive LOS standard. The City's specific vehicle LOS thresholds have been defined based on community values with respect to modal priorities, land use context, economic development, and environmental resources and constraints. As such, the City has established variable LOS thresholds appropriate for the unique characteristics of the City's diverse neighborhoods and communities. The City will strive to operate the roadway network at LOS D or better for vehicles during typical weekday conditions, including AM and PM peak-hour conditions with exceptions where LOS E or LOS F is allowed.

The 2030 General Plan included policies that established LOS E as the standard in multi-modal districts and LOS D as the standard for all areas outside of multi-modal districts. Proposed Policy M 1.2.2, listed above, applies the LOS D standard citywide, and makes the standard more lenient, i.e., allowing LOS E or F within the Core Area (Central City Community Plan Area), Priority Investment

Areas, light rail station areas, and other specifically identified roadways for which facility expansion to reduce congestion would cause unacceptable impacts (e.g., considerable right-of-way acquisition, land use displacement). Policy M 1.2.2 is essential for the proposed Mobility Element, and the Draft Master EIR uses the proposed change in LOS standards (defined in detail below) as the threshold of significance for roadways within the Policy Area that are under City jurisdiction. By moving away from automobile-oriented congestion and travel-time standards for mobility, this policy change also aligns with the goals of recent state legislation, i.e., Senate Bills (SB) 375, 226, and 743, which promote infill development, reduction of vehicle miles traveled, and/or multi-modal mobility for purposes of greenhouse gas (GHG) reduction and other environmental benefits of more compact, urban, and transit-served development. Subsection E of Policy M 1.2.2 does not establish a separate LOS threshold, but could be applied in individual circumstances as warranted. In any such case, however, the threshold to be applied would be LOS D, and deterioration in such a case to LOS E or F would be viewed as a significant effect.

(See Section 4.1616 “Climate Change” for a detailed discussion of the 2035 General Plan consistency with SB 375, 226, and 743.)

For the purposes of this Master EIR, impacts on transportation and circulation are considered significant, if the proposed General Plan would:

- ▲ cause a roadway facility in the City of Sacramento to degrade from LOS D or better to LOS E during typical weekday conditions, including a.m. and p.m. peak-hour ~~conditions~~ with the following exceptions where LOS E or F is allowed as indicated below. (Exhibit 4.12-2 shows the boundary of each vehicle LOS exception area.)

A. Core Area (Central City Community Plan Area) – LOS F allowed

B. Priority Investment Areas – LOS F allowed

C. LOS E Roadways - LOS E is allowed for the following roadways because expansion of the roadways would cause undesirable impacts or conflict with other community values.

- 65th Street: Elvas Avenue to 14th Avenue
- Arden Way: Royal Oaks Drive to I-80 Business
- Broadway: Stockton Boulevard to 65th Street
- College Town Drive: Hornet Drive to La Rivera Drive
- El Camino Avenue: I-80 Business to Howe Avenue
- Elder Creek Road: Stockton Boulevard to Florin Perkins Road
- Elder Creek Road: South Watt Avenue to Hedge Avenue
- Fruitridge Road: Franklin Boulevard to SR 99
- Fruitridge Road: SR 99 to 44th Street
- Howe Avenue: El Camino Avenue to Auburn Boulevard
- Sutterville Road: Riverside Boulevard to Freeport Boulevard

LOS E is also allowed on all roadway segments and associated intersections located within ½ mile walking distance of light rail stations.

D. Other LOS F Roadways - LOS F is allowed for the following roadways ~~(up to the identified volume/capacity ratio shown below)~~ because expansion of the roadways would cause undesirable impacts or conflict with other community values.

- 47th Avenue: State Route 99 to Stockton Boulevard (~~V/C: 1.01~~)
- Arcade Boulevard: Marysville Boulevard to Roseville Road (~~V/C: 1.27~~)
- Carlson Drive: Moddison Avenue to H Street (~~V/C: 1.50~~)
- El Camino Avenue: Grove Avenue to Del Paso Boulevard (~~V/C: 1.01~~)

- Elvas Avenue: J Street to Folsom Boulevard (~~V/C: 1.35~~)
 - Elvas Avenue/56th Street: 52nd Street to H Street (~~V/C: 1.04~~)
 - Florin Road: Havenside Drive to Interstate 5 (~~V/C: 1.03~~)
 - Florin Road: Freeport Boulevard to Franklin Boulevard (~~V/C: 1.06~~)
 - Florin Road: Interstate 5 to Freeport Boulevard (~~V/C: 1.01~~)
 - Folsom Boulevard: 47th Street to 65th Street (~~V/C: 1.26~~)
 - Folsom Boulevard: Howe Avenue to Jackson Highway (~~V/C: 1.20~~)
 - Folsom Boulevard: US 50 to Howe Avenue (~~V/C: 1.64~~)
 - Freeport Boulevard: Sutterville Road (North) to Sutterville Road (South) (~~V/C: 1.05~~)
 - Freeport Boulevard: 21st Street to Sutterville Road (North) (~~V/C: 1.23~~)
 - Freeport Boulevard: Broadway to 21st Street (~~V/C: 1.08~~)
 - Garden Highway: Truxel Road to Northgate Boulevard (~~V/C: 2.22~~)
 - H Street: Alhambra Boulevard to 45th Street (~~V/C: 1.08~~)
 - H Street 45th: Street to Carlson Drive (~~V/C: 1.53~~)
 - Hornet Drive: US 50 Westbound On-ramp to Folsom Boulevard (~~V/C: 1.06~~)
 - Howe Avenue: US 50 to Fair Oaks Boulevard (~~V/C: 1.47~~)
 - Howe Avenue: US 50 to 14th Avenue (~~V/C: 1.05~~)
 - Raley Boulevard: Bell Avenue to Interstate 80 (~~V/C: 1.06~~)
 - South Watt Avenue: US 50 to Kiefer Boulevard (~~V/C: 1.19~~)
 - West El Camino Avenue: Northgate Boulevard to Grove Avenue (~~V/C: 1.14~~)
- ▲ Cause the roadway facility in unincorporated Sacramento County to degrade from LOS E or better to LOS F or worse. For facilities that are already worse than LOS E without the project, a significant impact occurs if the project increases the V/C ratio by 0.05 or more on a roadway.
 - ▲ Cause the roadway facility in the City of Elk Grove to degrade from LOS D or better to LOS E or worse. For facilities that are already worse than LOS D without the project, a significant impact occurs if the project increases the V/C ratio by 0.05 or more on a roadway.
 - ▲ Cause a freeway segment to change from LOS A, B, C, D, or E under the 2035 No Project scenario to LOS F, or
 - ▲ Add 100 trips to a freeway segment already operating at LOS F under the 2035 No Project scenario.
 - ▲ Adversely affect existing and planned public transit facilities or services, or fail to adequately provide access to transit.
 - ▲ Adversely affect existing and planned bicycle facilities or fail to adequately provide access by bicycle.
 - ▲ Adversely affect existing pedestrian facilities or fail to adequately provide access by pedestrians.

The Draft Master EIR concludes that potential to adversely affect non-auto mobility and roadway LOS within the policy area are less-than-significant impacts. (See Draft Master EIR, Impact 4.12-1 and Impact 4.12-2) The revised threshold text does not change the LOS standards, but allows flexibility for applying the standards to individual future projects. Because the actual LOS standards would not change, the Draft Master EIR's impact analysis does not require revision, and the Draft Master EIR's conclusion--impacts to roadways within the Policy Area are less than significant--remains unchanged. Therefore, the above-described alteration to Policy M 1.2.2 would not result in new impacts or substantial increase in severity of impacts already identified in the Draft Master EIR. This change does not constitute significant new information.

City staff also made minor adjustments to Exhibits 4.12-1 and 4.12-2. Staff has recently developed a detailed GIS map of the 2035 General Plan's roadway classifications and existing/planned lanes that will be

used for implementation. In doing so, staff was able to zoom into areas of the City to confirm, at a more specific level, the road classifications as well as the existing and future number of lanes envisioned in the General Plan. Table 5-1 illustrates the changes to Exhibit 4.12-1. Exhibit 4.12-2 is revised to clarify the southern and eastern boundaries of the Central City vehicle LOS exception areas. Revised Exhibit 4.12-1 and 4.12-1 Inset are shown below. These changes added a finer level of detail to the exhibit, but did not result in any changes to the Draft Master EIR analysis or conclusions.

Table 5-1 Changes to Draft MEIR Exhibit 4.12-1

Street	Original Draft MEIR Exhibit 4.12-1	Revised Exhibit 4.12-1
W. Elkhorn Blvd. (Powerline Rd. to Highway 99)	Indicated as a planned arterial.	Now an arterial
Natomas Central Dr. (Del Paso Rd. to El Centro Rd.)	Indicated as a local road.	Now an arterial.
Natomas Crossing Drive (Cashaw Way to Truxel Rd.)	Indicated as a planned arterial	Now an arterial.
South Land Park Drive (Windbridge Dr. to Greenhaven Dr.)	Indicated as a major collector.	Now a local road.
Broadway (65 th St. to Redding Ave.)	Not indicated	Now indicated as a planned arterial.

Source: City of Sacramento 2014

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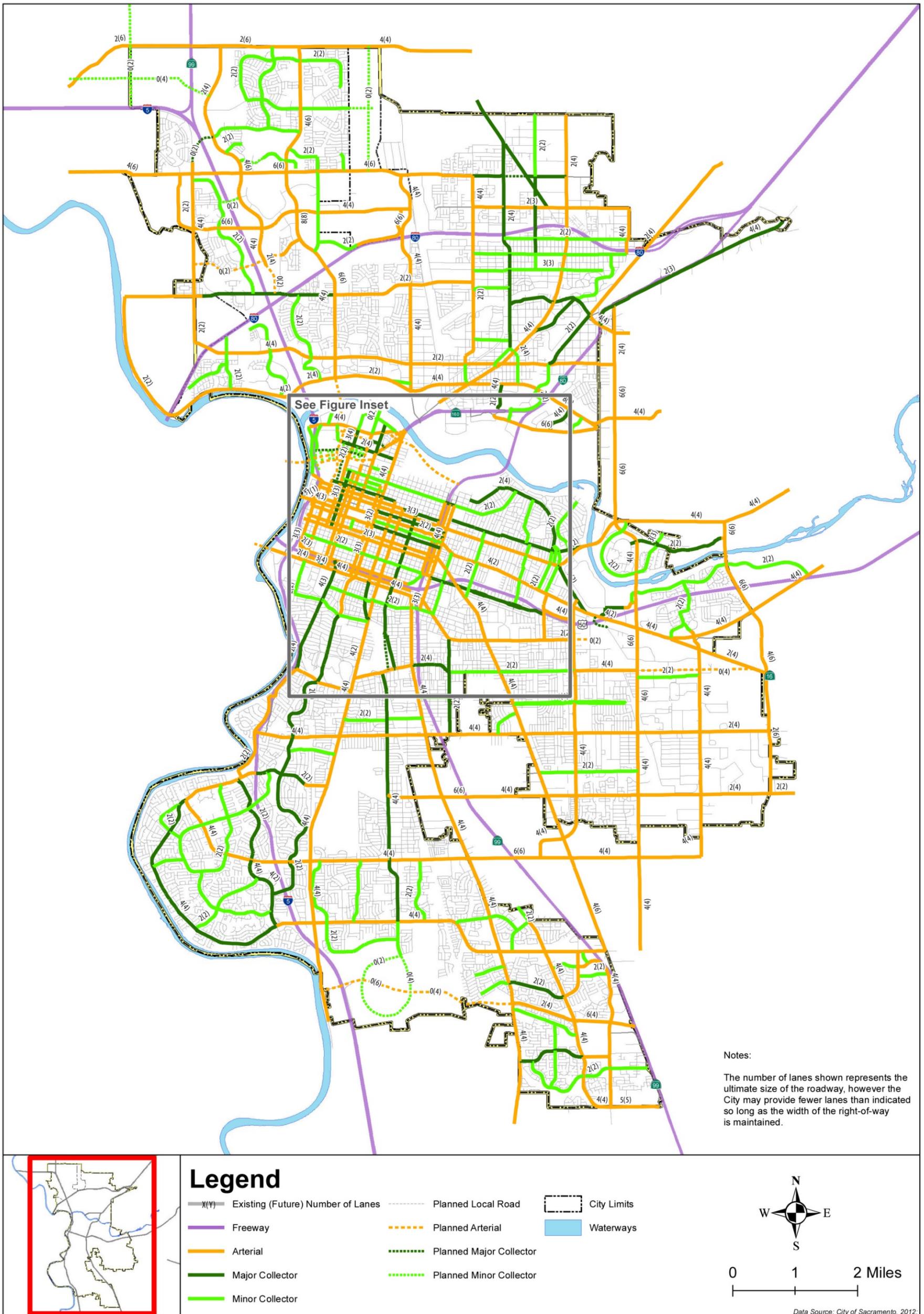


Exhibit 4.12-1

2035 General Plan Roadway Classification and Lanes

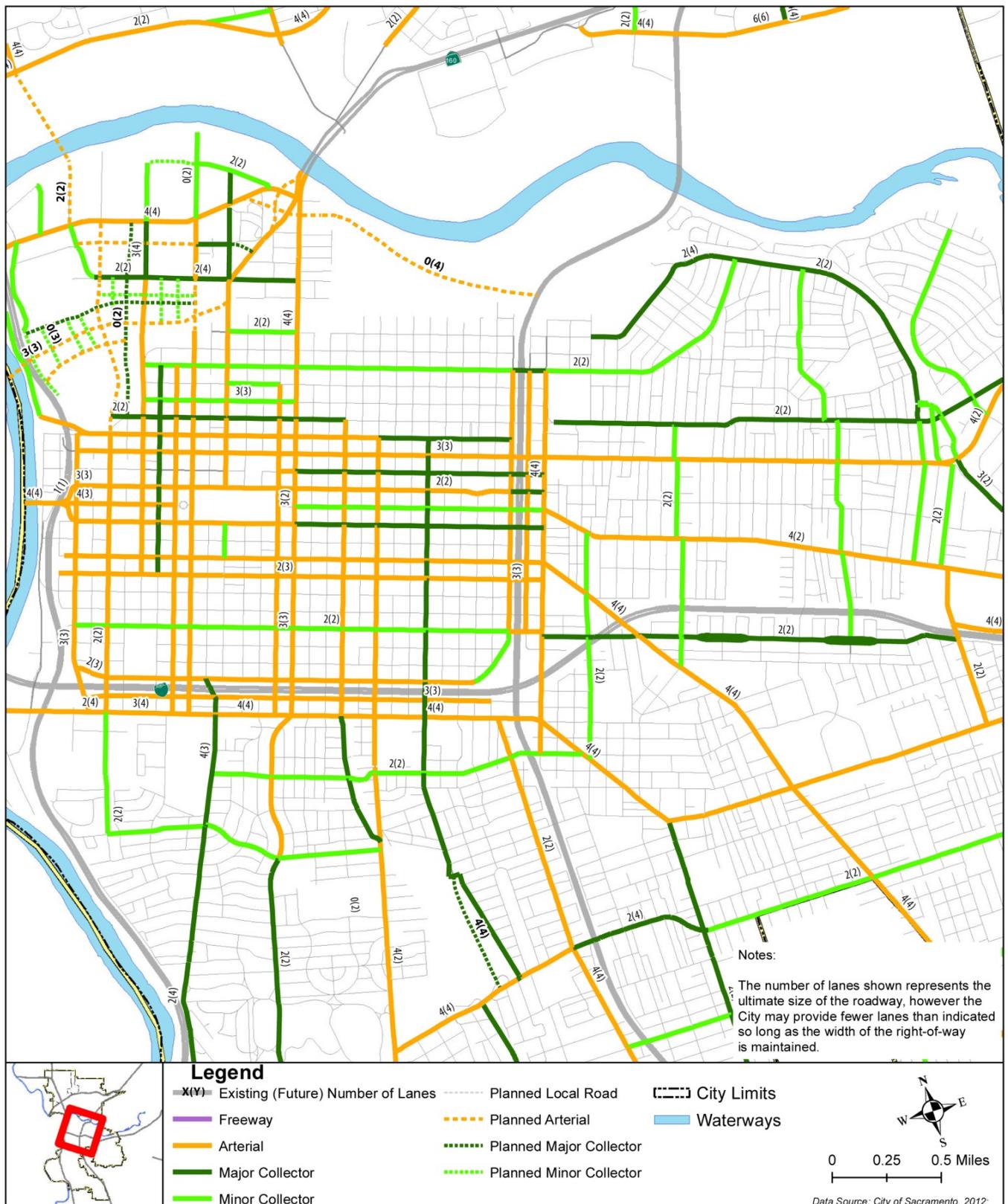


Exhibit 4.12-1 Inset

2035 General Plan Roadway Classification and Lanes

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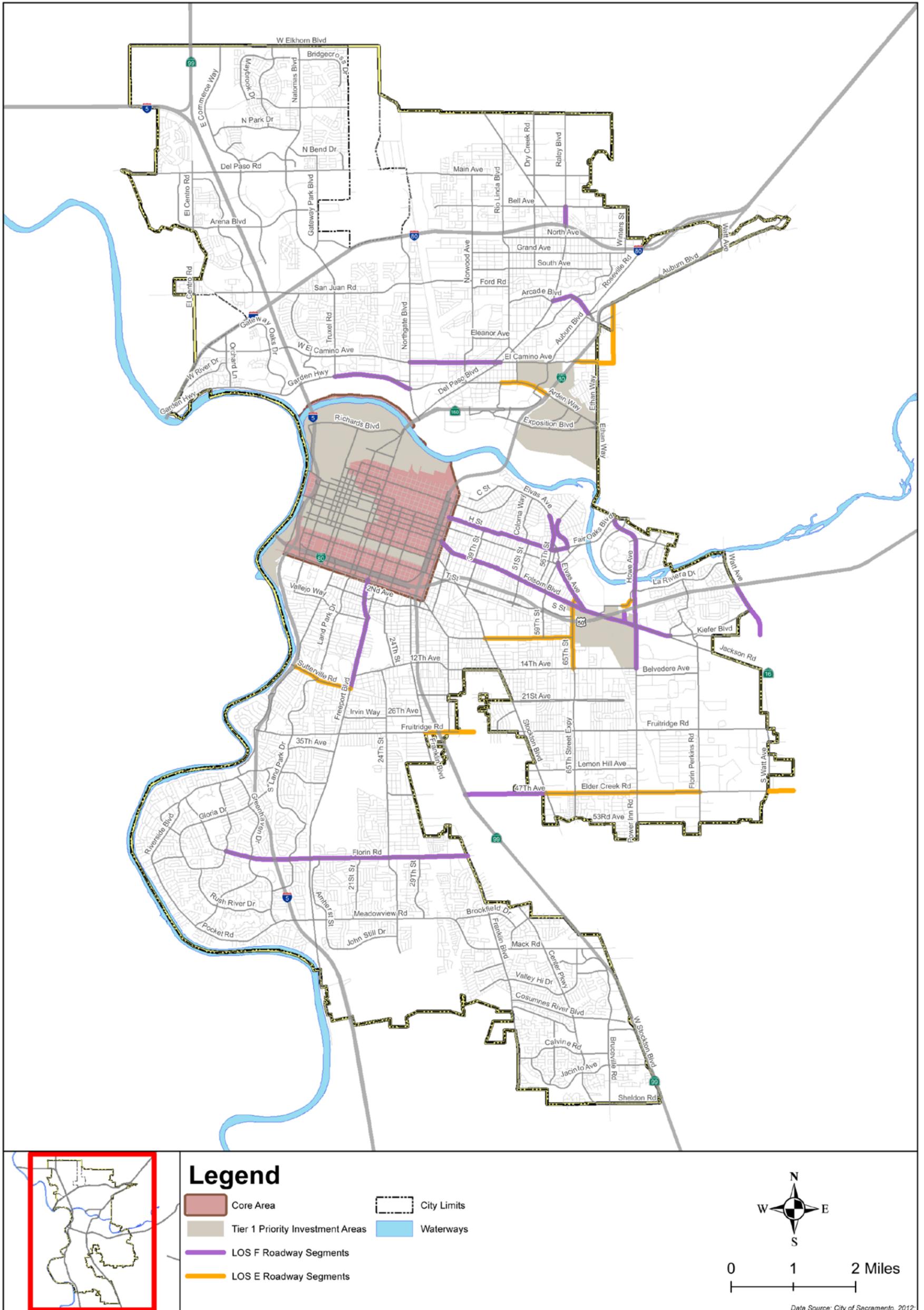


Exhibit 4.12-2

Level of Service Policy Exception Areas

5.9 REVISIONS TO SECTION 4.13, “VISUAL RESOURCES”

Staff initiated minor revisions to Policies LU 2.2.3 and LU 2.3.2. The text on page 4.13-2 of the Draft MEIR is revised as follows:

- ▲ **LU 2.2.3 Improving River Development and Access.** The City shall require new development along the Sacramento and American Rivers to use the natural river environment as a key feature to guide the scale, design, and intensity of development, and to maximize visual and physical access to the rivers, subject to the public safety requirements of the Local Maintaining Agencies (LMA) and the Central Valley Flood Protection District (CVFPB). (RDR/MPSP)
- ▲ **LU 2.3.2 Adjacent Development.** The City shall require that development adjacent to parks and open spaces complements and benefits from this proximity by:
 - preserving physical and visual access
 - requiring development to front, rather than back, onto these areas
 - using single-loaded streets along the edge to define and accommodate
 - public access
 - providing pedestrian and multi-use trails
 - augmenting non-accessible habitat areas with adjoining functional parkland
 - extending streets perpendicular to parks and open space and not closing off visual and/or physical access with development
 - addressing the operations, maintenance, and public safety needs of the Local Maintaining Agencies (LMA). (RDR)

5.10 REVISIONS TO CHAPTER 5, “ALTERNATIVES”

The second paragraph on page 5-3 is revised as follows to reflect the change in previously proposed parkland service level standard to retain the currently adopted standard:

The proposed 2035 General Plan is a “technical update” of the current 2030 General Plan, which means a refinement and update that generally follows the existing policy directions. Therefore, the differences between the two plans, overall, are minor (i.e., no substantial changes to the 2030 General Plan land use diagram, only minor changes to the densities, incorporation of Climate Action Plan actions, minor policy changes including the change in traffic ~~and parks~~ level of service [LOS]). In addition, most of the significant impacts associated with the proposed 2035 General Plan were also identified in the 2009 MEIR as significant for the 2030 General Plan. Because of these similarities, the City reviewed the list of Alternatives considered in the 2009 MEIR for the 2030 General Plan to determine if any of the alternatives should be considered as part of the environmental evaluation of the proposed 2035 General Plan.

5.11 REVISIONS TO CHAPTER 7, “REFERENCES”

The text on page 7-3 of the Draft MEIR is revised as follows:

Chapter 7, “References”: p. 7-3: California Department of Transportation. ~~2004~~2013. *Transportation- and Construction-Induced Vibration Guidance Manual*. Sacramento, CA: Noise, Vibration, and Hazardous Waste Management Office. ~~Prepared by Jones & Stokes. Page 524.~~

5.12 REVISIONS TO DRAFT MEIR APPENDIX C, “BACKGROUND REPORT”

The text on page 4-5 of the Background Report is revised as follows:

3. The Capitol Area Plan is a master plan of proposed state facilities in the greater downtown area. ~~The State Department of General Services has agreed to mitigate the additional sewage flows from State facilities by funding certain new pipeline construction in the combined system as new State facilities are constructed. Mitigation for the increased sewer flows from the Capitol Area Plan projects contained in the Capitol Area Plan will be made on a project-by-project basis. Payment of any and all fees by the State Department of General Services (DGS) will be paid based on the development’s fair share of costs to implement such a project.~~

As requested by the Central Valley Flood Protection Board, a new diagram is provided in the Background Report showing the critical facilities with an overlay of the FIRM Designations. The following diagram is inserted into the Environmental Hazards section of the Background Report immediately following Figure 7.2 on page 7-19. The Table of Contents of the Background Report will be updated to reflect this change.

5.13 REVISED DRAFT MEIR SECTION 4.9 “PARKS AND RECREATION”

City staff initiated a change to proposed policy ERC 2.2.4 to retain the currently adopted parkland service level standard. This change is described in detail under Master Responses 4.1.1. Draft MEIR Section 4.9, “Parks and Recreation,” is revised to reflect the change in previously proposed parkland service level to retain the currently adopted standard. Other text changes described in Chapter 4 have also been included in revised Section 4.9, which is provided in its entirety below.

4.9 PARKS AND RECREATION

4.9.1 Introduction

This section evaluates the effects of adoption and implementation of the proposed 2035 General Plan on parks and recreation, and discusses relevant plans and policies. The 2035 General Plan includes policies in the Education, Recreation, and Culture Element and the Land Use and Urban Design Element that reflect the importance of parks and open space to the health of its citizenry and economy. The policies also address the need to establish small public spaces, such as plazas and pocket parks, in high density areas while preserving the city’s unique physical characteristics - two major rivers, a creek system, watersheds, and agricultural history.

One comment letter was received in response to the Notice of Preparation (see Appendix B) concerning parks and open space. The comment requested establishment of a funding mechanism for the full implementation of the regional park in North Natomas.

4.9.2 Environmental Setting

A detailed Environmental Setting is provided in the Background Report (BR) included as Appendix C of this Draft MEIR. See Section 5.3, “Parks and Recreation,” in BR Section 5, “Public Services.” As noted in the BR, the city currently contains 222 developed and undeveloped park sites, 88 miles of road bikeways and trails, 21 lakes/ponds or beaches, over 20 aquatic facilities, and extensive recreation facilities in the City parks. The 222 parks comprise 3,108 acres. Of these, 1,573 acres are neighborhood and community parks and the remaining are city and non-city regional parks. The City currently provides approximately 3.4 acres of neighborhood and community park per 1,000 ~~persons~~ residents citywide.

4.9.3 Impacts and Mitigation Measures

METHODS OF ANALYSIS

The 2035 General Plan as originally circulated for public comment included policies that established park acreage service levels at 1.75 acres of neighborhood and community parks per 1,000 population for the Central City, and 3.5 acres for the remainder of the City. These service levels differ from those established by the 2030 General Plan, which calls for 2.5 acres each of neighborhood and community parks per 1,000 population citywide. The proposed service levels generated substantial comment, and the 2035 General Plan in this regard has been revised to call for 5 acres of neighborhood and community parks per 1,000 population.

The 2030 General Plan includes Table ERC 1, which identifies various types of facilities that are provided under the general category of parks and recreation. As part of the 2035 General Plan process, it was determined that this level of detail was not productive for general plan and long-range planning purposes. The proposed 2035 General Plan thus includes policies that identify park service level acreages for neighborhood and community parks (see Policy ERC 2.2.4) and 0.5 miles of linear park facilities per 1,000 population (Policy ERC 2.4.1) but otherwise has approached the ongoing efforts provide adequate park facilities to general policy statements.

~~The General Plan would establish park acreage Service Level Goals for areas within the Central City and for areas outside the Central City, as follows:~~

- ~~▲ Within the Central City: 1.75 acres of neighborhood and community parks per 1,000 population.~~
- ~~▲ Outside the Central City: 3.5 acres of neighborhood and community parks per 1,000 population.~~
- ~~▲ Table ERC1 in the general plan identifies service level goals for other types of parks and recreational amenities.~~

~~These goals differ from the goal established in the 2030 General Plan, which was 5 acres of neighborhood and community parks and recreational facilities per 1,000 residents for the entire city. This change in service level goal is based on the City’s experience in identifying, acquiring, and operating park facilities. In particular, parkland acquisition, especially in developed urban areas, is often not feasible due to the scarcity of available land and the resources needed to develop and operate park facilities. Common challenges are that dedicated sites may be too small to create a park of meaningful size, other vacant land may be in short supply, or park development costs (including in lieu park fees) may make projects infeasible. In the Central City, the proposed new goal is based on the amount of vacant or underutilized land that is appropriate for parkland acquisition relative to the projected future population in the Central City, and was developed after considering downtown park service level goals of other cities.~~

An additional consideration is that park service levels are related to the fees charged to developers for park land acquisition and improvement. The revised service levels are intended to generate charges that can be defended as reasonably related to the services the City actually provides.

Table 4.9-1 shows the number of new park acres that would be required to serve development proposed in the 2035 General Plan to achieve the identified service levels. Impacts on bike and pedestrian facilities are discussed in Section 4.12, "Transportation and Circulation."

Location of Park	City Goals ¹	Projected Population in 2035 ²	Total Required New Park Acres by 2035
Central City	1.75 acres per 1,000 population	109,312	17 ac
Outside Central City	3.5 acres per 1,000 population	531,069	406 ac

Note:
¹—As defined in General Plan Policy ERC 2.2.4.
²—The population growth attributed to the 2035 General Plan is approximately 165,000 new residents.

Full buildout of the General Plan would result in Sacramento’s population growing to approximately 640,400 by 2035. This is an increase of approximately 165,000 residents when compared to the estimated population of 475,500 in 2012 (U.S. Census 2012). Land dedicated to the City for park development as part of the development process contributes toward meeting the Service Level Goals for parks. Land that may be developed in the future for parks and recreation uses, but not under the City’s jurisdiction, would not be considered a contribution towards meeting the Service Level Goal.

PROPOSED GENERAL PLAN POLICIES

The following goals and policies from the proposed 2035 General Plan are relevant to parks and open space within the entire Policy Area. Policies 2.2.4 and 2.2.5 reflect changes in text that have been made since the original circulation of the Draft MEIR for public comment.

Education, Recreation, and Culture

Goal ERC 2.1: Integrated Parks and Recreation System. Provide an integrated system of parks, open space areas, and recreational facilities that are safe and connect the diverse communities of Sacramento.

- ▲ **Policy ERC 2.1.1:** Complete System. The City shall develop and maintain a complete system of parks and open space areas throughout Sacramento that provide opportunities for both passive and active recreation.
- ▲ **Policy ERC 2.1.2:** Connected Network. The City shall connect all parts of Sacramento through integration of recreation and community facilities with other public spaces and rights-of-way (e.g., buffers, medians, bikeways, sidewalks, trails, bridges, and transit routes) that are easily accessible by alternative modes of transportation.

Goal ERC 2.2: Parks, Community and Recreation Facilities and Services. Plan and develop parks, community and recreation facilities and services that enhance community livability; improve public health and safety; are equitably distributed throughout the city; and are responsive to the needs and interests of residents, employees, and visitors.

- ▲ **Policy ERC 2.2.1:** Parks and Recreation Master Plan. The City shall maintain and implement a Parks and Recreation Master Plan to carry out the goals and policies of this General Plan. All new

development will be consistent with the applicable provisions of the Parks and Recreation Master Plan.

- ▲ **Policy ERC 2.2.2:** Timing of Services. The City shall ensure that the development of parks and community and recreation facilities and services keeps pace with development and growth within the city.
- ▲ **Policy ERC 2.2.3:** Service Level Radius. The City shall strive to provide accessible public park or recreational open space within one-half mile of all residences.
- ▲ **Policy ERC 2.2.4:** Park Acreage Service Level Goal. The City shall strive to develop and maintain 1.75 ~~5~~ acres of neighborhood and other community parks and recreational facilities/sites per 1,000 population ~~in the Central City, and 3.5 acres of neighborhood and community parks and recreational facilities per 1,000 population in the remainder of the city.~~
- ▲ **Policy ERC 2.2.5:** Meeting Service Level Goal. The City shall require new residential development to meet its fair share of the park acreage service level goal by either dedicating land for new parks, paying a fair share of the costs for new parks and recreation facilities, ~~and/or pay a fair share for rehabilitation~~ or renovation of existing parks and recreation facilities. For new development in urban areas where land dedication or acquisition is constrained by a lack of available suitable properties is not reasonably feasible (e.g., the Central City), ~~the City shall require~~ new development to shall either construct improvements or pay fees for existing park and recreation facility enhancements to address increased use. Additionally, the City shall identify and pursue the best possible options for park development such as joint use, regional park partnerships, private open space, acquisition of parkland, and use of grant funding.
- ▲ **Policy ERC 2.2.6:** Urban Park Facility Improvements. In urban areas where land dedication is not reasonably feasible (e.g., the Central City), the City shall explore creative solutions to provide neighborhood park and recreation facilities (e.g., provision of community-serving recreational facilities in regional parks) that reflect the unique character of the area. (MPSP)
- ▲ **Policy ERC 2.2.7:** Public Parkland Preservation. The City shall ensure that any public parkland converted to non-recreational uses is replaced to serve the same community, consistent with California's *Public Park Preservation Act of 1971* (Public Resources Code Section 5401).
- ▲ **Policy ERC 2.2.8:** Capital Investment Priorities. The City shall give priority to the following parks and recreation capital investments:

 - Acquiring land for or constructing parks and recreation facilities where adopted Service Level Goals are not being met.
 - Acquiring, restoring and preserving large natural areas for habitat protection and passive recreation use such as walking, hiking, and nature study.
 - Acquiring and developing areas for recreation use and public access along the banks of the American and Sacramento Rivers.
 - Building and improving parks and facilities to ensure safety for users and adjacent properties.
- ▲ **Policy ERC 2.2.9:** Small Public Places for New Development. The City shall allow new development to provide small plazas, pocket parks, civic spaces and other gathering places that are available to the public, particularly in infill areas, to help meet recreational demands.

- ▲ **Policy ERC 2.2.10: Range of Experience.** The City shall provide a range of small to large parks and recreational facilities. Larger parks and complexes should be provided at the city's edges and along the rivers as a complement to smaller sites provided in areas of denser development.
- ▲ **Policy ERC 2.2.11: On-Site Facilities.** The City shall promote and provide incentives such as density bonuses or increases in building height for large-scale development projects to provide on-site recreational amenities and gathering places that are available to the public.
- ▲ **Policy ERC 2.2.12: Compatibility with Adjoining Uses.** The City shall ensure that the location and design of all parks, recreation, and community centers are compatible with existing adjoining uses.
- ▲ **Policy ERC 2.2.13: Surplus or Underutilized Land.** The City shall consider acquiring or using surplus, remnant, vacant, or underutilized parcels or abandoned buildings for public recreational use.
- ▲ **Policy ERC 2.2.14: Youth "Friendliness."** The City shall provide parks and facilities for youth between the ages of 10 and 18 to ensure safe gathering places for their recreation.
- ▲ **Policy ERC 2.2.15: Aging Friendly Community.** The City shall develop facilities that support continuing engagement, foster the personal enrichment and independence of older residents, and reflect the needs of Sacramento's aging population within the community.
- ▲ **Policy ERC 2.2.16: Organized Sports Facilities.** The City shall develop facilities (e.g., multi-field complexes) for a variety of organized sports.
- ▲ **Policy ERC 2.2.17: Joint Use Facilities Co-Located.** The City shall support the development of parks and recreation facilities co-located with public and private facilities (e.g., schools, libraries, and detention basins).
- ▲ **Policy ERC 2.2.18: Private Commercial Recreational Facilities.** The City shall encourage the development of private commercial recreational facilities to help meet recreational interests of Sacramento's residents, workforce, and visitors.
- ▲ **Policy ERC 2.2.19: Municipal Golf Courses.** The City shall maintain and reinvest in municipal golf courses, to foster a sense of community pride, ensure the City's courses remain competitive in the marketplace, and encourage play.
- ▲ **Policy ERC 2.2.20: Responsiveness to Community.** The City shall work with affected neighborhoods in the design of parks and recreational facilities to meet the unique needs and interests of residents (e.g., providing for cultural heritage gardens and teen centers).

Goal ERC 2.3: Recreational Programs. Support recreation and community service programs that promote wellness, fun, lifelong learning, skill development, personal enrichment, and positive relationships.

- ▲ **Policy ERC 2.3.1: Interpretation and Celebration.** The City shall provide recreation programming, special events and venues, and educational opportunities that honor, interpret, and celebrate the diversity, history, cultural heritage, and traditions of Sacramento.

Goal ERC 2.4: Rivers, Creeks, and Natural Resource Areas. Provide positive recreational experiences and enjoyment of nature through the development, maintenance, patrol, and preservation of the rivers, creeks, and natural resource areas, while maximizing the use of these areas through partnerships with other agencies.

- ▲ **Policy ERC 2.4.1:** Service Levels. The City shall provide 0.5 linear mile of parks/parkways and trails/bikeways per 1,000 population.
- ▲ **Policy ERC 2.4.2:** Waterway Recreation and Access. The City shall work with regional partners, State agencies, private land owners, and developers to manage, preserve, and enhance the Sacramento and American River Parkways and urban waterways and riparian corridors to increase public access for active and passive recreation.
- ▲ **Policy ERC 2.4.3:** Connections to Other Trails. The City shall maintain existing and pursue new connections to local, regional, and state trails.
- ▲ **Policy ERC 2.4.4:** Setbacks from Rivers and Creeks. The City shall ensure adequate building setbacks from rivers and creeks, increasing them where possible to protect natural resources.

Funding

Goal ERC 2.5: Funding. Secure adequate and reliable funding for the acquisition, development, rehabilitation, programming, and maintenance of parks, community facilities, recreation facilities, trails, parkways, and open space areas.

- ▲ **Policy ERC 2.5.1:** Multiple Tools. The City shall use a broad range of funding and economic development tools to ensure high-quality development, maintenance, and programming of the City parks and recreation system.
- ▲ **Policy ERC 2.5.2:** River Parkways. The City shall coordinate with Sacramento County and other agencies and organizations to secure funding to patrol, maintain, and enhance the American River and Sacramento River Parkways.
- ▲ **Policy ERC 2.5.3:** Property Acquisition. The City shall secure funding for property acquisitions that can be accessed quickly to respond to opportunities.
- ▲ **Policy ERC 2.5.4:** Capital Funding. The City shall fund the costs of acquisition and development of City neighborhood and community parks and community and recreation facilities through land dedication, in lieu fees, and/or development impact fees.

Implementation Program 2: The City shall review and update the Park Development Impact Fee Program and Quimby Ordinance to reflect the ~~parks and recreation standards of the General Plan~~ and the anticipated need for existing facility rehabilitation and renovation, higher parkland construction costs, and development of active sport areas. (FB)

Implementation Program3: The City shall, at least every five years, review and update, as necessary, the Park Development Impact Fee Program and Quimby ~~Program~~Ordinance to address existing facility rehabilitation and renovation and anticipated parkland land acquisition and construction needs/costs. The City may also (or alternatively) select to appropriate other funds to address facilities rehabilitation and renovation on a case-by-case basis. (FB)

Land Use and Urban Design

Goal LU 9.1: Open Space, Parks, and Recreation. Protect open space for its recreational, agricultural, safety, and environmental value and provide adequate parks and open space areas throughout the city.

- ▲ **Policy LU 9.1.1:** Open Space Preservation. The City shall place a high priority on acquiring and preserving open space lands for recreation, habitat protection and enhancement, flood hazard management, public safety, water and agricultural resources protection, and overall community benefit.

- ▲ **Policy LU 9.1.2:** New Parks and Open Spaces. The City shall ensure that sufficient parks, open space, water corridor parkways, and trails planned throughout the city, to ensure adequate facilities are available to existing and future residents.
- ▲ **Policy LU 9.1.3:** Connected Open Space System. The City shall ensure that new development does not create barriers to the connections among the various parts of the city’s parks and open space systems.
- ▲ **Policy LU 9.1.4:** Open Space Buffers. The City shall use traditional, developed parks and employ innovative uses of open space to “soften” the edges between urban areas and the natural environment.
- ▲ **Policy LU 9.1.5:** Private Boat Docks and Marinas. The City shall discourage development along the rivers of privately-owned boat docks and marinas that are not available to the general public.
- ▲ **LU 9.1.6 American River Parkway Plan.** The City recognizes the American River Parkway Plan as an important ~~state approved~~ State land use and policy document prepared through the Urban American River Parkways Preservation Act (Public Resources Code 5840, et al). (RDR/MPSP)

THRESHOLDS OF SIGNIFICANCE

For the purposes of this Draft MEIR, impacts on parks and open spaces are considered significant if the proposed General Plan would

- ▲ cause or accelerate a substantial physical deterioration of existing area parks or recreational facilities; or
- ▲ result in new facilities, the construction and operation of which could cause substantial adverse effects on the physical environment.

IMPACTS AND MITIGATION MEASURES

Impact 4.9-1	Potential physical deterioration of existing parks or recreational facilities due to increased use.
Applicable Regulations	City of Sacramento City Code Chapter 18.44 Park Development Impact Fee
Proposed SGP Policies that Reduce Impacts	ERC 2.1.1, ERC 2.2.1 through ERC 2.2.8, ERC 2.2.11, ERC 2.2.17, ERC 2.2.18, ERC 2.4.1, ERC 2.4.2, ERC 2.5.1, ERC 2.5.4
Significance after Implementing SGP Policies	Less than Significant
Mitigation Measures	None required

An increase in population resulting from implementation of the 2035 General Plan could result in higher demand on area parks or recreational facilities, with resulting physical deterioration of these facilities.

An additional 165,000 residents are anticipated with development that could occur under the 2035 General Plan. General plan policies have been proposed to ensure that adequate parks and recreational facilities are provided to accommodate the increase in new residents. For example, Policy ERC 2.1.1 requires the City to develop and maintain a complete system of public parks and open space areas throughout Sacramento that provides opportunities for both passive and active recreation. Policy ERC 2.5.4 requires the City to fund the costs of acquisition and development of neighborhood and community parks and community and recreation facilities through land

dedication, in lieu fees, and/or development impact fees. In highly urbanized areas where land dedication is not feasible, such as the Central City, Policy 2.2.5 requires new development to construct improvements or pay fees for facility enhancement and/or maintenance of existing parks.

~~The existing city wide, neighborhood and community serving parks comprise 1,573 acres. The existing neighborhood and community serving parks outside of the Central City comprise approximately 1,452 acres (1,573 acres citywide – 121 in Central City = 1,452 outside the Central City). The 2010 population estimate for the area outside the Central City is approximately 379,361, which provides approximately 3.83 acres per 1,000 residents. This meets the proposed general plan service level goal of 3.5 acres per 1,000 residents outside of the Central City.~~

Proposed General Plan policies would provide assurances that appropriate park facilities would be provided and maintained. For instance, Policy ERC 2.2.6 requires new residential development to dedicate land or pay in-lieu fees for parks or recreation facilities. Therefore, new residential development would be required to ensure that adequate parkland is provided or applicable fees paid to the City to purchase additional park facilities. Policy ERC 2.4.1 also requires the City to maintain service levels to provide linear parks/parkways and trails/bikeways. The expansion, planning, development, and use of joint facilities are additional means to achieve required service levels and to offset needs of park and recreational facilities. The policies set forth in the proposed 2035 General Plan are designed to ensure that future development within the Policy Area would not create a need for construction or expansion of recreational facilities beyond what was anticipated in the General and/or Community Plans.

~~Funding for acquisition of new park acreage, and generation of funds committed to maintenance and operation of parks and recreational facilities, are ongoing activities of the City. A combination of funding sources, including the Quimby Act, support these activities. The funding is adequate on an ongoing basis to maintain the existing parks and recreational facilities, and those that would be constructed in the future. Implementation of the policies proposed in the General Plan would ensure that increased demand associated with an increase in population would not significantly accelerate the deterioration of existing park areas or recreational facilities on a citywide basis, outside of the Central City. Therefore, this impact would be **less than significant** outside the Central City.~~

~~One of the ongoing themes, clearly established in the 2030 General Plan and continued in the policies of the 2035 General Plan, is a focus on increasing density within the city limits, and especially the Central City, to encourage reduction in vehicle miles traveled, one of the primary generators of greenhouse gas emissions. The City's efforts have included policies that increase allowable density, encouragement of mixed use development, and investment in projects that provide meaningful residential, employment, and recreational opportunities for those residing in the Central City. During the period the 2035 General Plan is being considered by the community, for example, work on the downtown entertainment and sports center, funded in part by the City, is beginning. In addition, work is starting on a mixed-use development on K Street, with financial support from the City.~~

~~As part of its review of the park service levels, the City conducted a review of sites in the Central City that could serve as potential park sites. The City identified 17 acres of vacant properties. When combined with the existing 121 acres of park sites in the Central City and the 55 acres to be dedicated with the Township 9 and Railyards projects (for a total of 174 acres), the total acreage results in approximately 1.75 acres of parkland per 1,000 residents, based on the projected population in the Central City in 2035. In reducing the Central City's park service level, the City is acknowledging that there is a need for an urban park service level goal in the Central City that reconciles the planned increase in population with the limited supply of vacant land that could be developed for neighborhood and community park purposes.~~

~~The City's commitment to increasing densities in the Central City, however, remains a key policy and development approach. Increasing the population as supported by the general plan policies will increase the usage of the parks in the Central City, and this is a significant impact.~~

The 2030 General Plan, and the proposed 2035 General Plan, each recognize the importance of parks and recreation facilities. The City's long-term commitment to infill development, with an attendant reduction in vehicle miles traveled and reduction in greenhouse gas emissions, is also a prominent theme in the general plan. The increase in productive use of vacant properties, and intensification of use in other properties, will result in an increase in population and will likely result in increased demand for park and recreation facilities, both existing and planned for acquisition and development in the future. This is a significant impact.

Mitigation Measure

One of the basic features of parks in the city is space: sometimes this is an open grass area, shaded by trees, or it might consist of baseball fields, basketball courts or walking paths. The City is committed to providing recreational opportunities to its residents, but the availability of land to support such open space in the Central City is limited, as discussed above. To respond to the potential for increased demand that leads to increased usage and deterioration, the City must develop new approaches to the use of existing park facilities, cooperate with other recreational providers, and generate funds that can be used for facility maintenance, renovation and programs.

The policies and implementation programs of the 2035 General Plan will support such efforts. The City's efforts will be guided by the overall goal established in this regard:

Goal ERC 2.5: Funding. Secure adequate and reliable funding for the acquisition, development, rehabilitation, programming, and maintenance of parks, community facilities, recreation facilities, trails, parkways, and open space areas.

Residential development is required to contribute money or land to provide recreational resources to meet new demand. This model works well in areas where there is land available for new facilities and the focus of development is on residential uses. In an area such as the Central City, however, land is scarce and development includes a mix of commercial and residential uses, with the residential uses coming in various forms, including condominiums and apartments. The approaches used elsewhere must be tailored to fit the specific requirements of the Central City.

The 2035 General Plan includes implementation measures that will support these efforts:

Implementation Program 2: The City shall review and update the Park Development Impact Fee Program to reflect the parks and recreation standards of the General Plan and the anticipated need for existing facility rehabilitation and renovation, higher parkland construction costs, and development of active sport areas. (FB)

Implementation Program 3: The City shall, at least every five years, review and update, as necessary, the Park Development Impact Fee Program and Quimby Program to address existing facility rehabilitation and renovation and anticipated parkland land acquisition and construction costs. The City may also (or alternatively) select to appropriate other funds to address facilities rehabilitation and renovation on a case-by-case basis.(FB)

The general plan policies, goals and implementation measures will not increase the supply of vacant land in the Central City. They will, however, provide a foundation for City efforts to generate substantial funds that can be used to protect the existing park resources, improve facilities so that they can be used by more residents, and support programming that provides residents with meaningful access to the facilities and programs.

The City's focus in the Central City must also be on maximizing other recreational opportunities for residents. The general plan supports such efforts. For example:

Policy ERC 2.5.2: River Parkways. The City shall coordinate with Sacramento County and other agencies and organizations to secure funding to patrol, maintain, and enhance the American River and Sacramento River Parkways.

The Central City is located in close proximity to a host of recreational amenities. The American River Parkway is noted in Policy 2.5.2, but it is just one of many resources. The Sacramento River, Old Sacramento Historic State Park, Sutter's Fort, Capitol Park, and the short walk over the Tower Bridge to Raley's Field are evidence of accessibility to additional recreational opportunities. The City's vision of new economic and recreational activity in the downtown area is a reasonable basis for planning and commitment, and can be expected to provide opportunities for recreation that may differ from those in more suburban areas, but are meaningful nonetheless.

The adoption and implementation of the goals, policies and implementation measures of the 2035 General Plan will provide resources to protect and enhance the existing park facilities, and to provide a well-rounded recreational experience for downtown residents. With this support for the City's efforts, the impact on Central City park facilities will be reduced to **less than significant**.

Impact 4.9-2 Potential to increase need for construction or expansion of recreational facilities.	
Applicable Regulations	State Public Park Preservation Act, Quimby Act, City of Sacramento Municipal Code Chapter 12.72, 16.64, and 18.44
Proposed SGP Policies that Reduce Impacts	ERC 2.1.1, ERC 2.2.1 through ERC 2.2.8, ERC 2.2.11, ERC 2.2.17, ERC 2.2.18, ERC 2.4.1, ERC 2.4.2, ERC 2.5.1, ERC 2.5.4
Significance after Implementing SGP Policies	Less than Significant
Mitigation Measures	None required

The identification, acquisition, planning, funding, development and operation of parkland is an ongoing process, and can extend over many years. The process includes coordination by the City with neighborhoods and other governmental agencies. The potential impacts of construction and operation are intimately related to location, timing and design of specific facilities. The park planning process is designed to account for, and minimize, impacts on residents and businesses who could be affected by the park facilities. These efforts assist in reducing impacts.

The potential for significant impacts would increase if residential growth resulted in unexpected demand and the need for construction and operation of additional facilities. The 2035 General Plan has designated various areas of the city for development in residential land uses of various densities, and the growth projections based on these designations, and anticipated economic activity during the general plan period, include development of park facilities. The general plan policies identified above support the City's ongoing program of planning, funding, developing and operating park facilities to serve the City's residents.

The adoption and implementation of the 2035 General Plan would not result in unplanned development of new park facilities, and the impact would be **less than significant**.

Mitigation Measure

None required.

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6 REFERENCES

de Beauvieres, pers. comm., 2014. Telephone conversation between Mary de Beauvieres, Principal Planner, City of Sacramento Department of Parks and Recreation and Mike Parker, Senior Environmental Planner at Ascent Environmental regarding parks operations, maintenance, and funding. October 7, 2014.

UC Davis 2012. *Urban Trees and Ozone Formation: A Consideration for Large-Scale Plantings*. Prepared by UC Davis Department of Agriculture and Natural Resources. Available at: <http://anrcatalog.ucdavis.edu/pdf/8484.pdf>. Accessed October 15, 2014.

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