

## Comments on the Public Review Draft of the Sacramento General Plan 2030

### GENERAL

Diagrams included in the document are extremely helpful, especially for the Land Use section. However, photographs of existing development (preferably in Sacramento) should be included for each category described in the Land Use section to help users better visualize what each type of development can look like “on the ground.”

### GRAMMAR/TYPOS

p. 1-11 – Final sentence of 1<sup>st</sup> paragraph reads “the city has been routed as...” rather than “touted as...”

p. 1-19 – Explanation under TIMELINE reads “Identifies and estimated...” rather than “an estimated...”

p. 2-15 – First sentence in description of *City of Rivers* under Goal LU 2.2 reads “Preserve and enhance the Sacramento’s riverfronts...” rather than “Preserve and enhance Sacramento’s riverfronts...”

p. 2-24 – Under policy LU 2.8.1, the word that is repeated twice in the first sentence.

p. 2-29 – Last sentence of the final paragraph that explains FAR reads “The diagram above shows how various building configurations representing FARs...” so the word how should be deleted or the word representing should be changed to represent.

p. 2-100 – The end of Urban Form Guidelines #6 reads “structured parking arate parking structures.”

p. 2-168 – The first sentence under Policy M 2.1.3 reads “the City shall require pedestrian-oriented streets shall...” so the second shall should be deleted.

p. 3-CC-5 – The first two sentences of the first paragraph under Predominant Land Uses have spacing problems (several words strung together with no spaces).

p. 3-CC-13, CC.SPD 1.12 – The reference to Saratoga Town homes should be Saratoga Townhomes.

p. 3-ES-6, Notes for Table ES-1 – The table doesn’t include any item to correspond with note (b).

### LAND USE

p. 2-8, LU 1.1.7 – Policy should clearly favor projects that are proposed in line with the new GP land use designations rather than existing inconsistent zoning. Otherwise, certain land-owners may hurry to submit an application for a project that doesn’t fit with the GP vision prior to rezone, resulting in projects that are inconsistent and inappropriate for the overall vision of the GP.

p. 2-11, LU 1.1.11 – Policy should clearly state that GP will be amended no more than 4 times per year. This is stated later in the GP (on p. 4-4 and in Table 4-1) and should be included in this section for consistency and precision.

p. 2-61, LU 4.5.4, 4.5.5., 4.5.6 – These are excellent! The language used is strong and prescriptive for each of these policies, clearly indicating that the City will require (not just “support” or “encourage”) new neighborhoods to be planned and built out in certain

ways to encourage walkability and complete neighborhoods. Assuring that the Zoning Code supports these policies is critical!!!

p. 2-104, LU 7.1.4 – The bullet points provide strong guidance for how employment centers should be developed to emphasize the experience of the people who work in these centers. Including a list of specific characteristics really helps to develop this policy in a more tangible fashion, which should result in better project proposals for any new employment centers.

p. 2-105, LU 7.2 – Is there enough land use set aside in the GP to accommodate and encourage the amount of future Industrial Growth that the City needs?

p. 2-110, Public/Quasi-Public – The description in the first paragraph assumes and accepts that these areas “often include a significant amount of surface parking lots and structured parking.” The part about parking lots should be deleted in order to encourage more structured parking for any facility, as structured parking is a better land use in almost any circumstance, despite the fact that it might be more costly to construct than a surface lot.

p. 2-113, LU 8.1.15 – This policy directly contradicts the City’s recent action and decision related to Greenbriar.

p. 2-114, LU 8.2.2 – This policy refers to “certain areas of the city” but offers no specifics about where the City will encourage artist enclaves and live/work studios, so more specificity is necessary.

p. 2-126, LU 10.1.4 – The phrasing of this policy, “The City shall... obtain a General Plan Amendment to designate the area consistent with the proposed project using the appropriate designations...” still suggests that the City will be *reactive* to proposals for the Planned Development areas rather than *proactive* in laying out a vision for these areas that potential developers must then follow and incorporate into their proposals.

p. 2-126, LU 10.1.5 – The Planned Development Sunset policy is excellent and critical to favoring development of infill over greenfield sprawl.

## **HISTORIC AND CULTURAL RESOURCES**

p. 2-136, HCR 2.1.13 – What sort of Code issues or conflicts may arise with this policy about adaptive reuse? How can the City proactively implement Code modifications to implement this policy?

## **MOBILITY**

p. 2-162, M 1.2.2 – This policy declares that the City “shall allow for flexible Level of Service standards” but then the bullet points definite certain standards. Why can’t these standards be evaluated on a project-level basis rather than set at a particular level based on different areas or districts?

p. 2-163, M 1.3.1 – The Grid Network policy is excellent!

p. 2-164, M 1.4.2, 1.4.3 – Why are these policies for Transportation Demand Management written as “encourage” instead of “require”? The language used here should be stronger.

p. 2-165, M 1.5.5 – Are there issues with current City ordinances that could prevent the use of Neighborhood Electric Vehicles?

p. 2-168, M 2.1.3 – What is the City policy for replacement of trees, in the context of this policy on Streetscape Design? From personal experiences, I've seen many trees removed and not replaced for weeks or months. As a City of Trees, we need to have a clear policy about the process and timeline for tree replacement.

p. 2-182, M 4.4.1 & related diagrams – NO 8-LANE ROADS NEEDED IN THE CITY!!!

p. 2-189, Commercial Streets – This description sounds like exactly what we're trying to avoid: "buildings set back behind fronting parking lots... numerous intersections and driveways." Shouldn't this description focus on how we'd like these types of streets to look in the future rather than on how they've traditionally been constructed?

p. 2-195, M 6.1.2, 6.1.4 – Reducing parking standards and parking areas are critical to the success of the City as we grow in smarter ways. Excellent policies! This reinforces my earlier point about the parking assumed for Public/Quasi-Public Uses, as the Parking policies in the Mobility Element clearly contradict the continued tolerance of surface parking lots.

## **UTILITIES**

p. 2-219, U 4.1.1, 4.1.2 – The tradition of disposing of green waste on the streets is an impediment to these policies related to adequate drainage and master planning to prevent floods. I high encourage the City to revise the policy for green waste and require green waste to be placed in bins rather than dumped into the streets.

p. 2-222, U 5.1.5 – This policy also relates to the previous comment, as the City could adopt a policy to provide green waste collection by requiring residents to use bins for this type of refuse.

p. 2-223, U 5.1.15 – What is the "Sacramento Regional Recycling Market Development Zone"???

p. 2-229, Telecommunications – some discussion of the potential health impacts related to cell phone towers should be included. The City should at least acknowledge that many people have concerns about this issue and that some research suggests that long-term effects may occur.

## **EDUCATION, RECREATION, AND CULTURE**

p. 2-235, ERC 1.1.2 – Again, the City's recent decision on the siting of the school in Greenbriar directly contradicts the first bullet point in this policy about Locational Criteria.

p. 2-235, ERC 1.1.3 – Including a policy about the use of smaller sites for urban schools is excellent, as every community and neighborhood needs nearby schools, not just those areas that have enough vacant land to satisfy the current standards as set by the various School Districts.

p. 2-243, ERC 2.2.13 – One potential use for vacant land is "bag" gardens, in which large bags of soil are place on a parcel for people to use for gardening. This assures easy removal later and doesn't require the upfront investment of time or funds of a full-scale Community Garden. Another option for the City is to invite interested residents or neighborhood groups to "adopt" vacant sites or buildings in order to create a community-specific recreational space.

p. 2-255, ERC 4.1.17, 4.4.18 – The verbs in these policies should be require rather than encourage to enhance the City’s supply of public art.

### **PUBLIC HEALTH AND SAFETY**

p. 2-269, PHS 2.2.2 – The City needs to initiate a discussion about flexible design standards for development proposals so that Public Safety issues can be addressed but are not an impediment to the other goals of the project.

p. 2-270, PHS 2.2.9 (?) – This section needs another policy that encourages the procurement and use of smaller equipment for infill projects in order to assure that the needs of large equipment don’t outweigh the benefits and progress of infill development in the City.

p. 2-282, PHS 5.1.7 – This policy should encourage additional Farmer’s Markets and Community Gardens in areas of the City that are underserved by access to fresh and healthy food.

### **ENVIRONMENTAL RESOURCES**

p. 2-300, ER 3.1.2 & p. 2-301, ER 3.1.7 – These policies are related to the earlier comment about a timeline for tree replacement. If the City truly wants to enhance its tree canopy and provide shade trees, then the GP needs to have clear goals and timelines for planting of both new and replacement trees.

p. 2-303, ER 4.1.2 – This policy should include reference to front-yard gardens and “edible” landscaping. The City will also need to work with developers and potentially update the Code to actually create rooftop gardens or green spaces.

p. 2-310, ER 6.1.8 – The City should discourage or prohibit certain types of development near major roadways rather than simply placing an arbitrary distance limit on certain types of development. This policy should be reconsidered.

p. 2-311, ER 6.1.14 – The goal of encouraging 35% of City employees to use alternate transportation is too low. The City needs to set an example for residents, so this figure should be at least 50%.

### **ENVIRONMENTAL CONSTRAINTS**

p. 2-322, EC 2.1.7 – The City should not allow any encroachment with the 50-foot area on the landside toe of the levees, regardless of whether or not certain improvements are completed.

p. 2-328, EC 3.1.8 – Alternative to sound walls are definitely needed! The City needs to push developers to avoid sound walls and find other, more creative ways to either mitigate noise or propose different land uses that aren’t as susceptible to noise irritation.

### **COMMUNITY PLAN AREAS AND SPECIAL STUDY AREAS**

Overall comment/lament related to the North Natomas Community Plan – What a shame that this lovely hasn’t been implemented according to its lofty vision. What happened to the “fourteen neighborhoods [with] an elementary school that serves as a focal point with

parks, transit, civic uses, and convenience commercial within close proximity”? What happened to the vision of the “Town Center... as an activity center which will become the focus and identity, both visually and geographically, of the community... [that is] pedestrian-oriented and reinforce[s] the use of transit... encourage[s] activity to create a 24-hour mixed use center... Public uses, such as the regional park and library, might incorporate private enterprises related to the use... A telecommuting center run as a profit generator could be located in the library.”

**\*AS A CITY, WE ABSOLUTELY MUST DO BETTER IN THE FUTURE TO IMPLEMENT THESE COMMUNITY PLANS TO ASSURE THAT OUR RESIDENTS HAVE THE QUALITY OF LIFE THEY EXPECT AND DESERVE. IF WE DON'T FOLLOW THROUGH, WE WILL NEVER REACH OUR GP GOAL.\***

p. 3-5, Neighborhoods – The first sentence reads “Areas of the city that are primarily residential, but may, and frequently do, include other uses...” should be changed to read “...may, and frequently should, include other uses...” in order to be consistent with the City’s vision for complete neighborhoods.

p. 3-6, New Growth Areas – The first sentence reads “Identified greenfield areas adjacent to the city where new growth will occur...” should be changed to “...may occur...” in order to avoid the assumption that New Growth Areas will actually be built out.

p. 3-CC-1, Photograph for Central City Community Plan – What a sad commentary on the current built state of our City that this aerial image features only rooftops and asphalt with hardly any green space or notable architecture!

p. 3-CC-3, Plan Location for Central City – The map needs to be revised to include the R Street Corridor as an identified neighborhood.

p. 3-CC-5, Predominant Land Uses – This description should also include restaurants and nightlife that currently form an integral part of the Central City.

p. 3-NS-17, Table NS-1 – Is part of McClellan Heights/Parker Homes really located in South Natomas as the note (a) indicates? Ditto for Strawberry Manor. The 1<sup>st</sup> row under Gold Line Stations incorrectly reads “Del Pas Light Rail” instead of “Del Paso Light Rail.”

P. 3-p-3, Community Location – The second sentence declares that this area is “entirely within the city limits of Sacramento” and the fourth sentence repeats “The Community Plan Area is located entirely within the city limits of Sacramento” so the fourth sentence should be deleted.

p. 3-SA-8, First paragraph above photograph – The next to last sentence of this paragraph repeats information from the first sentence in reference to the MLK, Jr. Library and the Job Corps. This latter sentence should be deleted.

p. 3-SA-26, Table SA-1 – The note for the Florin Subregional Center doesn’t make sense. How can the Subregional Center be “Partially located in the Florin Subregional Center”?

## **GP ADMINISTRATION & IMPLEMENTATION**

p. 4-12, Table 4-1, Item 10 – Add “Parking Standards” to the list of items that need to be updated within the Code to be consistent with the GP.

p. 4-17, Table 4-2, Items 15 & 16 – These two programs listed are identical/redundant.

- p. 4-21, Table 4-3, Items 12 & 15 – These two programs are identical although the policies and departments are different. These items should be combined.
- p. 4-29, Table 4-6, Item 12 – Can a similar program be added for working with cycling advocates, such as SABA, to develop materials for cyclists?
- p. 4-49, Table 4-10, Item 16 – The wording of this program needs to be stronger and should read “The City shall conduct a study to recommend and develop new processes to improve monitoring...”

## **APPENDICES**

- p. App-25, Flood Insurance Rate Map – This map needs to be updated to reflect the change that will occur with the new FEMA classification. Including a map that “current as of April 2008” when the City knows that this map will be modified before the end of the year is disingenuous at best and intentionally misleading at worst.
- p. App-37, Photograph for Glossary – Is this from somewhere in Sacramento? And is the image of some creature spearing a fish while a bear looks on nearby really appropriate for the GP in general and the Glossary section in particular?