

August 5, 2008

Mr. Tom Pace
Long-Range Planning Manager
City of Sacramento, Planning Department
New City Hall
915 I Street, 3rd Floor
Sacramento, CA 95814

SUBJECT: Sacramento 2030 General Plan
AQMD NO: SAC200500814D

Dear Mr. Pace:

Thank you for providing the Sacramento 2030 General Plan (General Plan) to the Sacramento Metropolitan Air Quality Management District (SMAQMD) for review. While the plan does not include a separate Air Quality Element, the District recognizes that many of the measures from the District's Model General Plan Air Quality Element have been included in other elements within the General Plan.

In order to maximize the air quality benefits from the General Plan, SMAQMD staff recommends that the city consider revisions to some of the policies and actions. This letter recommends modifications to policies and actions in the following elements: Land Use, Mobility, Environmental Resources, and Administration and Implementation. In addition, we recommend new policies that would improve the overall air quality thereby benefiting the residents of Sacramento and the region. Specific comments follow.

Land Use and Urban Design

1. Land Use Policy 2.7.6 requires new development and redevelopment to create walkable, pedestrian scaled blocks. The District recommends that the City make the policy more specific by referencing or repeating the block size requirement from Land Use Policy 4.5.5, which mandates block sizes no larger than 400 feet.
2. The District endorses Land Use Policy 4.1.13. This policy discourages the creation of gated communities, which impede the movement of pedestrians and bicyclists, discourage the use of transit, and encourage single-occupant vehicle trips in automobiles.
3. Land Use Policies 4.3.2 and 4.3.3 address residential density in traditional neighborhoods. The District recognizes the City's desire to preserve the form and character of these neighborhoods; however, these policies may unnecessarily prevent the development of new residential or commercial units in the City's most

pedestrian, bicycle, and transit friendly neighborhoods. The District recommends that the City amend these policies to include a mechanism that allows for net increases in density, or "upzoning", in traditional neighborhoods where the increases in density could decrease personal motor vehicle trips. Examples could include parcels that are proximate to transit facilities, employment centers, commercial districts, etc.

4. The District endorses Land Use Policy 4.5.5, which requires new development to design the street network along traditional grid with pedestrian scale block faces.
5. The District recommends that Land Use Goal 8.1 include a policy to reduce the emissions associated with airport ground equipment. The additional policy could read:

"The City shall promote reduced emission ground support equipment within airport facilities, including electrified equipment, whenever possible."

Mobility

1. Mobility Policy 1.3.1 states that projects that extend existing streets or build new ones should "preferably" be developed as a grid or modified grid. The District recommends that the City rephrase this measure to require that new streets be developed along a grid, with blocks no larger than 400 feet, unless maintaining this LOS would, in the City's judgment, be infeasible and/or conflict with the achievement of other goals.
2. Mobility Policy 1.3.3b describes the City's goal to eliminate gaps in the pedestrian/ bicycle/ roadway network. The District recommends that this measure also address other barriers to mobility by rephrasing it to read:

"The City shall plan and seek funding to construct grade-separated crossings of freeways and rail lines *and other barriers* to improve connectivity."

3. The District recommends that the city expand Mobility Goal 1.4 to include the objective of reducing per capita Vehicle Miles Traveled.
4. The District endorses Mobility Policy 1.5.5 which encourages developments and street systems that support the use of Neighborhood Electric Vehicles (NEV).
5. The District endorses Mobility Goal 4.2 and the subsequent policies, which call for the implementation of "complete streets" principles on the City's roadway network.
6. Mobility Policy 6.1.2 indicates that the City will continue to require minimum levels of parking in new development. To support the efficient use of land and encourage bicycle, pedestrian, and transit trips, the District recommends that the City expand this policy to include the establishment of parking maximums.

Environmental Resources

1. The District recommends that the City amend Environmental Resource Policy 6.1.8 to require consultation with the District for projects within 500 feet of a freeway. The Amended text could read:

Development near Major Roadways. The City shall require that new development with sensitive uses within 500 feet of a ~~major roadway~~ freeway *consult with the Sacramento Metropolitan Air Quality Management District (SMAQMD). These projects shall be designed with consideration of site and building orientation and incorporate appropriate technology for improved air quality, flow, ventilation, and filtration to lessen any potential health risks due to the project's proximity to the roadway. (RDR)*

2. Environmental Resource Policy 6.1.9 requires coordination with the District and incorporation of feasible mitigation measures. The District recommends expanding the policy to identify the City's commitment to monitoring and enforcing all adopted mitigation. This amendment would be supported by implementation program 4.10-16 (page 4-49), which calls on the City to "conduct a study to explore the development of new processes to improve monitoring and enforcement of all CEQA mitigation measures, including air quality measures."

Climate Change and Greenhouse Gas Mitigation

As you know, with the passage of AB32, the state of California has adopted aggressive goals for the reduction of Greenhouse Gases (GHG). Currently, a myriad of state agencies, local air districts, municipalities and other organizations are working hard to help the state meet the goals of this new legislation. For example, the Governor's Office of Planning and Research (OPR) is working on CEQA guidelines for the treatment of GHG in environmental documents as well as guidance on the treatment of Climate Change and GHG in General Plans. That guidance has not yet been published. Climate Change and GHG mitigation is a fast evolving, very important issue for the state, nation and planet.

The actions that local jurisdictions can take in helping to reduce GHG are very important. Not only does a City government the size of Sacramento (over 5,000 employees) generate considerable GHG emissions in its operations, but the citizenry, commercial enterprises located there and businesses which work on behalf of City operations create emissions. By 2030, the City is expected to grow from 400,000 + residents to over 600,000 residents and, therefore, those GHG emissions will be even greater. A propensity of current climate scientists accepts that these man-made emissions are contributing to a global climate warming which affects the way life will be in the future not only in Sacramento but around the globe.

We are aware that the City of Sacramento has responded to the issue of climate change in a variety of ways. The City has performed several audits of its operational GHG

emissions, created a Board-approved Sustainability Master Plan, and has a full-time Energy Manager among other things. The General Plan under review includes four measures in the Environmental Resources section which specifically mention the words greenhouse gas emissions and target actions about them. Those measures state the City will:

1. work with ARB to comply with statewide goals (ER 6.1.3)
2. comply with state regulations to assess emissions and (ER 6.1.4)
3. reduce GHG from new development. (ER 6.1.5)
4. educate the public about ...efforts they can make to reduce greenhouse gas emissions (ER 6.1.17)

The General Plan also includes many measures which the City states could help to reduce the creation of GHG through their implementation. Those measures are summarized in Appendix B of the General Plan and include policies related to the built form, land use, mobility, open space, and utilities, among others.

In the absence of current, adopted guidance on how climate change and GHG mitigation should be treated in General Plans, we spoke with a representative of the Governor's Office of Planning and Research. That person supplied us with two documents as recent examples of good General Plans addressing climate Change and GHG. The two examples were from the City of Petaluma and Marin County. The City of Petaluma created a 17 page Greenhouse Gas Emissions chapter for their revised Draft General Plan 2025. Marin County adopted a detailed Countrywide Plan in 2007 which has a variety of policies specifically addressing Greenhouse Gas emissions. Both of these documents were robust in their discussion of climate change and GHG mitigation.

Other than a one page introduction to the issue of Climate Change in the Introduction to the Plan, The City of Sacramento's 2030 General Plan does not have a specific section of policies on Climate Change or GHGs. Rather, its four policies are part of the Air Quality section of the Environmental Resources chapter. The other policies interspersed throughout the Plan are summarized in an Appendix at the back of the document. Even the goal of reduction of GHG is inter-mixed with a goal for improvement of community air quality:

GOAL ER 6.1: Improved Air Quality: Improve the health and sustainability of the community through improved regional air quality and reduced greenhouse gas emissions that contribute to climate change.

1. The District believes the General Plan document would be stronger and clearer regarding policies on the climate change issue if it had a separate section for climate change/GHG reduction. A separate goal for GHG reduction, too, would indicate that the mitigation of GHG could help improve more than just the community's air quality. The policies chosen, too, could be more proactive in approach. Complying with state law and regulation is already required by law.

In addition, the District suggests the following:

2. ER 6.1.5 The Greenhouse Gas Reduction in New Development measure specifies that GHG emissions shall be reduced from new development by some specific design features- i.e. "discouraging auto-dependent sprawl and dependence on the private automobile; promoting development that is compact, mixed use, pedestrian friendly...." The District suggest some language such as "*but not limited to*" be added to this measure. In that way, new mitigation strategies could also be used as appropriate.

3. The City has a great deal of influence over its residents, the businesses which conduct operations there and the businesses with which it conducts business. The City could create several additional policies that influence the behavior of those groups. For example, there could be a policy about influencing residents and businesses about energy or water conservation. Finally, Policy ER 6.1.13 could be expanded to give preference to businesses which practice sustainable operations.

4. The City could create a policy that addresses possible GHG mitigation from the existing residential stock. This policy could speak to the need to find funding such as grants to help existing homeowners retrofit existing housing. Perhaps an ordinance could require housing upgrades at every transfer of ownership.

5. The Implementation Section of the Draft General Plan states "The City shall develop and adopt a Climate Action Plan that monitors climate change impacts, outlines a strategy for reducing greenhouse gas emissions and adapting to climate change; and describes how to improve air quality." The District suggests that the creation of such a Plan should be elevated as a priority. There should be a formal policy in the General Plan that commits to the creation and implementation of a Climate Action Plan. Such a Plan should be created with the participation and buy-in of all levels of City government and not just left in the General Services Department.

In conclusion, SMAQMD staff applauds the staff of City of Sacramento for including policies and programs in the 2030 General Plan that will benefit regional air quality and which will help with GHG mitigation. We welcome the opportunity to continue to work with the City as it implements the General Plan.

If you have questions regarding this letter, please contact Larry Robinson at 916.874.4816 or lrobinson@airquality.org.

Sincerely,



Larry Greene
Executive Director/Air Pollution Control Officer

cc: Larry Robinson, Sacramento Metropolitan Air Quality Management District