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June 7, 2023

Greg Sandlund, Planning Director
Sacramento Community Development Department
300 Richards Blvd., 3rd Floor
Sacramento, CA 95811

RE: Public Review Draft of the Sacramento 2040 General Plan

Dear Mr. Sandlund:

Thank you for inviting SACOG's input on the Public Review Draft of the Sacramento 2040 General Plan (Public Review Draft General Plan). The basis for our comments is the 2020 Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS), which lays out a land use and transportation strategy to reduce congestion, vehicles miles traveled, and greenhouse gas emissions using smart growth principles. The MTP/SCS establishes an ambitious, but achievable land use forecast and transportation system predicated, in part, on robust housing development and low-carbon transportation options in the City of Sacramento. The future described in the MTP/SCS will take leadership and commitment from local jurisdictions to support implementation strategies that will facilitate a shift from outcomes we have seen in the past.

The city's Public Review Draft General Plan offers the bold policy action needed to implement the MTP/SCS. SACOG would like to express our support for the staff proposal and recognize some of the specific actions that are well aligned with policies and recommendations from the MTP/SCS. While SACOG commends the direction of the Public Review Draft General Plan, we would like to offer recommendations for how the policies, actions, and implementing maps can even better move the needle on our shared goals. We have organized these recommendations into the general plan elements as they appear in the plan below:

Land Use and Placemaking

We are excited to see the city continue to work towards allowing for a greater array of housing types in existing single family neighborhoods and facilitating transit supportive growth along key commercial corridors. Opening single family neighborhoods to more housing product types and continuing to support growth along commercial corridors has tremendous potential for addressing our housing crisis, reducing vehicle miles traveled, and reducing residential segregation. These strategies are consistent with many recommended policies and actions in SACOG planning efforts. Policy 1 in the MTP/SCS promotes actions to support higher density housing options and a diversity of housing for all residents. The TOD Action Plan includes an explicit strategy for the City of Sacramento to regulate density through floor area ratio (S.1) and to increase single family densities (S.5). Additionally, the SACOG Housing Policy Toolkit includes recommendations to allow for missing middle products on all residentially zoned land

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

and to consider using floor area ratio instead of units/acre to regulate intensity. All these recommendations are implemented in the city's proposed land use element.

The proposed Maximum Floor Area Ratio Map (LUP-6) is a significant improvement on the status quo and positions the city to be a leader in both the region and the state in building an inclusive housing regulatory environment. That said, we encourage the city to explore higher Floor Area Ratios (FARs) within a ½ mile of all high frequency transit areas. Policy LUP-4.1 commits the city to “encourage increased residential and commercial development intensity within one-quarter mile of existing and planned light rail stations, commuter rail stations, and high-frequency bus stops...” While ¼ mile from stations and stops is a good start, we recommend expanding this area to ½ mile to be consistent with statutory definitions (like those of SB 375 and SB 743) as well as with the city's own TOD Ordinance, which applies to developments within ½ mile of all existing and planned light rail stations.

Additionally, it appears this policy is not uniformly applied to all station areas in Map LUP-6. The existing light rail stations that stand out in this respect are the areas surrounding the 39th St/UC Davis Heath, 48th St, Broadway, and 4th Ave/Wayne Hultgren, and Arden/Del Paso stations. In these station areas, the transit adjacent parcels in the high-demand and high opportunity East Sacramento, Elmhurst, Land Park, and Woodlake neighborhoods have the lowest maximum FAR in the City (1.0). If the City is seeking to “plan for higher development intensities around current and planned transit” as is stated in policy LUP-2.4 (Development Intensity Linked to Transit), we recommend these transit-rich and high opportunity neighborhoods have an FAR of at least 2.0, consistent with other transit-rich neighborhoods like Oak Park.

We recognize that the Public Review Draft General Plan, as proposed, is increasing allowed densities across the board, but the Maximum FAR map is still a signal to the market with increased development incentives where higher intensities are allowed. The Plan includes multiple policies aimed at reducing the risk of displacement (EJ-3.1, LUP-6.2, and many policies in the adopted Housing Element). There is a risk in the current Maximum FAR map for development to still favor neighborhoods like Oak Park, where the maximum FAR is 2-4, over the high demand, high opportunity neighborhoods described above, where maximum FAR is largely still 1.0. This may actually increase the risk of displacement rather than reducing it. The FAR allowances across the inner ring neighborhoods of East Sacramento, Elmhurst, Oak Park, Curtis Park, Land Park, and Woodlake should be based on policy and not on previous density restrictions with exclusionary origins. As a part of this General Plan Update, the city has an opportunity to set a new precedent and facilitate a low-carbon and inclusive regulatory environment that strongly aligns with the city's stated policies and outcomes. A higher maximum in places within walking distance of light rail, great schools, low pollution burden, and access to economic opportunities will help to facilitate the type of growth called for in both the city's and SACOG's stated goals.

To this end, we recommend the city explore more explicit language in Policy LUP-4.1 that defines or references a specific definition of existing and planned high frequency transit and then commits to a minimum allowed FAR higher than 1.0 within a ½ mile buffer of these transit stations and corridors. The city has [already adopted](#) a methodology for walking-distance ½ mile buffers around its existing and planned light rail stations in its TOD Ordinance. This approach could be applied to all existing and planned high frequency transit. While we recommend the city use the SB 375 definition of high quality transit defined in PRC Section 21155(b), or if the city prefers to use its own definition we recommend that it include key corridors identified through the Regional Transit Network Plan (see mobility section below). This standardized methodology would ensure that the intensity gradient in the Maximum FAR map is policy-driven and not subject to exceptions based on precedent.

Economic Development

This element aligns well with regional efforts to support economic prosperity formalized in the [Regional Prosperity Strategy](#), which provides a strategic framework and action plan for inclusive economic growth. In particular, we commend the focus on facilitating the creation of tradable sector clusters, inclusive development, and innovation/ collaboration. It will be critical to pair specific policies and programs to the identified job clusters as a means of increasing the likelihood of success. To this end, we recommend that implementing action E-A.7 (Development Incentives) include language directly tying future incentives to the tradable sector outcomes discussed in the Business Attraction and Development section. These outcomes could include specific clusters like food and agriculture, advanced manufacturing, and life sciences/health services, as identified in Policy E-1.1.

Mobility

We commend the city for the policies and programs aimed at prioritizing walking, biking, and transit over automobile use through measures like road reallocations (Map M-1), User prioritization (Policy M-1.2), and station access improvements (M-1.12). These strategies are an effective means by which the city can help to reduce vehicle miles traveled that put a strain on the region's transportation system and increase harmful tailpipe emissions, reduce future costs to maintain transportation infrastructure, and create a safer environment for pedestrians, cyclists, and drivers. This strategy is consistent with multiple MTP/SCS policies, including Policy 1 to build and maintain streets that are safe and attractive for all roadway users, Policy 20 to prioritize cost effective safety improvements that will help the region eliminate fatal transportation related accidents, Policy 22 to invest in bicycle and pedestrian infrastructure, and Policies 6 and 25 to prioritize transportation infrastructure that reduces greenhouse gas emissions and vehicle miles traveled.

SACOG recently embarked upon an extensive effort called the Regional Transit Network plan (RTN). RTN is a coordinated six-county effort, bringing together all transit operators, regional transportation planning agencies, and transportation districts to develop a common regional transit framework and focused implementation strategies. The final RTN plan, which will be ready for public review later this summer, will be integrated into SACOG's 2025 Blueprint and include near-term speed and reliability improvements, a defined long-term high-capacity network, and a list of prioritized high-capacity corridors intended to complement existing services.

SACOG encourages the city to consider these draft corridors and potential related transit-supportive improvements when finalizing Map M-3 (Candidate High-Frequency Transit Corridors). While many of the candidate high-frequency transit corridors in M-3 are consistent with the draft RTN corridors, there are a handful of potential corridors that are not included, like J St./Fulton, the existing RT Bus Route 62 on Freeport, and the regionally serving "Long High-Capacity Transit" trunk line corridors for inter-county and long-distance trips. These corridors meet many of the characteristics of successful high-frequency transit described on the preceding page (highly linear, serve developed areas with anchors on the ends of the lines, connect with other routes, etc.). Expansion of, and creating demand for, these high-capacity transit lines is critical to reaching SACOG's GHG reduction targets, as well as the City of Sacramento's sustainability targets of 11% transit mode share and a 20% VMT/capita reduction below 2020 levels by 2030.

Similarly, the City of Sacramento's sustainability target of moving from a 4.4% active transportation mode share to a 12% mode share in 2045 will require significant changes to the City's public right of way. While it is great to see the City explore some potential road reallocations in Map M-1, we recommend the City explore road reallocations in all of its Vision Zero Top Ten Corridors as a means of reaching its active mode goals (M-1.11), reducing reliance on single-occupant vehicles (Goal M-2), prioritizing walking over vehicle modes (Policy M-1.2), and achieving the M-4 goal of "a safer transportation system."

For action M-A.5, the City commits to "completing a study to assess the feasibility of regional VMT mitigation measures, including banks, exchanges, and impact fees." Given SACOG's potential role in implementing a regional VMT mitigation bank, we ask that the city add language that commits to coordinating with regional, and potentially, state partners in this effort. For Policy M-1.41 (Funding), we recommend the city modify the language related to exploring "actions to ensure adequate shares of regional funding." Per FHWA requirements, all federal funds through SACOG must be distributed through a performance-based process. The term "adequate shares" indicates a "fair share" approach and does not align with a performance-based approach to regional funding. Better phrasing for this Policy could be "actions to position the city to better capture sufficient funding through regional funding programs".

Thank you again for inviting SACOG's input on the City's Public Review Draft of the Sacramento 2040 General Plan. SACOG applauds the city for its commitment to creating a more inclusive and sustainable future as evidenced in the policies and strategies being considered in the general plan update. We look forward to engaging with the city on this topic through adoption of the plan. If you have further questions or need further assistance, please don't hesitate to contact me at (916) 340-6205.

Sincerely,

A handwritten signature in blue ink, appearing to read 'J. Corless', with a stylized, flowing script.

James Corless
Executive Director