

August 21, 2023

Remi Mendoza, CFM, Senior Planner/Project Manager  
Vic Randall, Senior Planner/Project Manager  
Community Development Department  
City of Sacramento  
915 I Street  
Sacramento, CA 95814

Re: Draft 2040 General Plan and Climate Action & Adaptation Plan

Dear Mr. Mendoza and Mr. Randall:

Thank you for the opportunity to submit comments in response to the City of Sacramento's drafts of its 2040 General Plan (GP) and Climate Action & Adaptation Plan (CAAP), hereby collectively referred to as the Drafts. We submit these comments on behalf of the Citizens' Climate Lobby, Sacramento Chapter.

We applaud Mayor Steinberg for having convened the Mayors' Commission on Climate Change (MCCC) which provided solid recommendations to the City several years ago. We also commend the City for establishing a variety of changes to the planning guidelines and climate goals. However, we are extremely concerned that, despite having set these goals, the Drafts do very little to establish specific, measurable goals, and dedicated, recurring funds required for implementation. Without bold actions, backed by funding and measurable goals, the Drafts will not significantly change Sacramento, and thus will not achieve the results we need for a livable and equitable future. We ask that serious consideration is given to our comments and that the Drafts be revised to address our concerns.

### **Determining Metrics and Establishing Goals**

In reviewing the Drafts, we felt it important to examine the goals and guidelines the City Council has established to determine whether the Drafts will result in achieving these specific goals. Here are the goals to which the City has committed:

- On December 10, 2019, the City Council declared a climate emergency, and charged the City Manager to use "maximum feasible efforts to implement emergency-speed carbon reduction actions towards eliminating emissions by 2030 as much as possible" (Res. No. 2019-0465).
- On January 14, 2020, the City Council declared a shelter crisis in the City of Sacramento (Res. No. 2020-0017), and approved the continuation of this declaration on September 13, 2022 (Res. No. 2022-0296)

To achieve this goal, the City must set and meet ambitious targets. In reviewing the Drafts, for our analysis, we rely in part on certain regulatory requirements and state guidance provided by the Governor's Office. For the CAAP 14 CCR § 15183.5 sets forth the requirements for a Climate Action Plan. It states:

(b) Plans for the Reduction of Greenhouse Gas Emissions. Public agencies may choose to analyze and mitigate significant greenhouse gas emissions in a plan for the reduction of greenhouse gas emissions or similar document. A plan to reduce greenhouse gas emissions may be used in a cumulative impacts analysis as set forth below. Pursuant to sections 15064(h)(3) and 15130(d), a lead agency may determine that a project's incremental contribution to a cumulative effect is not cumulatively considerable if the project complies with the requirements in a previously adopted plan or mitigation program under specified circumstances.

(1) Plan Elements. A plan for the reduction of greenhouse gas emissions should:

- (A) Quantify greenhouse gas emissions, both existing and projected over a specified time period, resulting from activities within a defined geographic area;
- (B) Establish a level, based on substantial evidence, below which the contribution to greenhouse gas emissions from activities covered by the plan would not be cumulatively considerable;
- (C) Identify and analyze the greenhouse gas emissions resulting from specific actions or categories of actions anticipated within the geographic area;
- (D) Specify measures or a group of measures, including performance standards, that substantial evidence demonstrates, if implemented on a project-by-project basis, would collectively achieve the specified emissions level;**
- (E) Establish a mechanism to monitor the plan's progress toward achieving the level and to require amendment if the plan is not achieving specified levels;**
- (F) Be adopted in a public process following environmental review.**

In the State of CA General Plan Guidance 2017, the California Environmental Quality Act (CEQA) also provides local governments with a standard for the methodology and measures used in Climate Action and General Plans: "...Methodology and calculations should be transparent and replicable with the goal of providing substantial evidence supporting the assumptions, analysis, and conclusions. Measures should also be real and verifiable, through either full enforceability or through substantial evidence in the record supporting an agency's conclusion that mitigation will be effective." The guidelines further include a quote from a recent court decision, that "...a plan should include measures that are known to be feasible, coupled with specific and mandatory performance standards to ensure the measures as implemented, will be effective." (p.229-230)

While offering significant flexibility in plan design, CEQA directs local governments to exercise authority through regulation of transportation, municipal operations, land use and building. "Cities and counties have the authority to reduce (GHG) emissions, particularly those associated with land use and development....." (p.222) and "...Local governments regulate many activities that contribute to GHG emissions and air pollutants, including industrial permitting, land use and transportation planning, zoning and urban growth decisions, implementation of building codes and other standards, and control of municipal operations." (p.223).

California has also set guidelines for housing throughout the state through SB 6 and AB 2011, both of which encourage mixed use zoning to improve the availability of low- and middle-income housing in the state.

We also rely on the goals set by the City in the respective documents, such as in the CAAP adaptation goals on slide 48 of the workshop:

- A-1: Strengthen City government capacity for integrated, holistic climate adaptive strategies and to reduce climate risks.
- A-2: Create built environments that reduce exposure to extreme heat and mitigate urban heat island effect.
- A-3: Reduce the risk of damage to life, infrastructure, and property due to flooding.
- A-4: Increase awareness of and expand community resources to address the adverse health effects of air pollution.
- A-5: Increase community resilience to prepare for climate impacts.
- A-6: Enhance water supply diversification and prioritize water use efficiency to build resilience to the effects of climate change.

And in the GP, the Guiding Principles:

- (2) Link new growth with access to high-frequency transit in order to optimize public investments and support an accessible, convenient network that offers a viable alternative to the automobile and promotes public health.
- (4) Cultivate a broad mix of housing types in all residential zones throughout the city to provide options for residents of all income levels, while protecting existing residents and communities from displacement.

**(5) Foster “complete neighborhoods” that provide for residents’ daily needs within easy walking or biking distance from home and that promote regular physical activity.**

(7) Take bold action to achieve carbon neutrality by 2045 and become a leading voice in the effort to reduce greenhouse gas emissions and adapt to climate change,”

(11) Integrate and invest in an extensive tree canopy, green infrastructure, parks, and gardens in all neighborhoods, particularly disadvantaged communities, to protect against excessive heat, to improve air and water quality, and to sustain human and environmental health. Recognize the importance of growing and maintaining a vibrant, expanding tree canopy for climate change mitigation and adaptation.

(14) Develop infrastructure to support zero emission transportation and provide viable options for low-income households.

(15) Prioritize safety in Sacramento’s neighborhoods, public parks, streets, and on public transit.

**(40) Reduce reliance on single-occupant vehicles, prioritize and promote active transportation and, high-occupancy transport.**

**(41) Improve the efficiency of the multi-modal transportation system and plan infrastructure that can flexibly accommodate rapidly emerging modes of transportation.**

(42) Recognize that traffic deaths and serious injuries are a public health issue and, with a goal of reaching zero traffic deaths by 2027 through the Vision Zero initiative, the City will make safety of human life the City’s highest priority, taking proactive, preventative steps.

(43) Include equity as a prioritization tool to ensure investment in underserved neighborhoods to improve equity in transportation, mobility, and other public service investments. Include all affected communities, including youth, in transportation planning decisions.

Because the goals in the Drafts are generally closely aligned and there are overlapping goals and actions, this comment has been broken up to address similar topics between the Drafts together, covering the Goals and Planning (G&P) and Implementing Action (IA).

### **Funding**

We have overarching concerns about the proposed Measures and Goals found in both documents. Many of the G&P and IA in the Drafts pertaining to the GHG reductions, don’t meet CEQA’s guidelines for Measures, as they are not real, feasible, enforceable, or supported by evidence. Moreover, planned actions often are insufficient to achieve the stated goals. The Drafts are not internally consistent. Half of the Priority Funding Measures do not meet the criteria as described in the CAAP and goals in the GP are not reflected consistently across the entire document. For example, establishing an urban tree canopy is a stated goal in Chapter 6 of the GP, Environmental Resources and Constraints, but it is not mentioned in Chapter 3, Land Use and Placemaking even though beautification is part of the G&P and IA for the chapter.

**The Draft goals are largely unfunded and unstaffed, especially the CAAP.** An unfunded plan is not real or feasible as required by CEQA. CAAP implementation is estimated at \$3.2 billion. It will require both “substantial commitment of staff time”, and the addition of 6 full-time staff people (69). The CAAP characterizes the City of Sacramento as “understaffed”, and notes that current staff is unable to implement all the actions assigned to “staff-in-kind”. (Appendix D, 24, Funding Chart 5-11). Despite this staffing deficit, current budget projections include only 1-2 additional staff for the Office of Climate Action and Sustainability.

The CAAP suggests the Civic Sparks Fellow program as a potential source of staffing (Appendix D, 2). But Civic Sparks Fellows are not comparable to permanent staff appointments. Fellows are “emerging professionals” and require more oversight and training than typical staff. Civic Sparks Fellows won’t provide continuity or build the institutional knowledge of regular staff. The fellowships last only 11 months. Further, the City can’t maximize funding opportunities if they lack the requisite staff to pursue them. Raising funds will require monitoring state and federal funding, drafting and revising applications, lobbying for changes to statutes, and more. Many of these tasks require expertise. All of them are labor intensive. **If the City is unwilling to provide the staff**

**necessary to develop and implement the goals in the Drafts, they are signaling an unwillingness to seriously address climate change and improve equity city wide.**

The CAAP measures also fall short of CEQA's mandate, as the City appears unwilling to exercise its authority to create substantive change. We are troubled by the City's lack of leadership and political will to provide measurable and funded goals. We see the City embrace politically expedient goals and measures rather than exercise regulatory control as CEQA intended. Most of the goals and measures are acceptable so far as they go but fail to create the degree of change necessary to be successful. This is especially apparent in the City's reluctance to champion changes in land use sufficient to impact our disastrous transportation patterns.

Per the CAAP, priority Funding will be given to measures that provide the most significant reductions in GHG emissions, and will be given to Measures that can be leveraged with funding from other sources. Based on this logic, the TR-1 AT and CS-1 Urban Tree Canopy Measures do not meet these criteria. However, the co-benefits, health, comfort, equity etc., resulting from an urban forest for Active Transportation (AT) can't be overstated. These benefits are significant enough to override other considerations. It should be specified in the document, making the priority process transparent and subject to review. It is very concerning to see the City promoting other expensive and ineffective measures given the grave lack of funding and abundance of alternative measures.

### **Sustainable Planning and Development**

The actions laid out in LUP-A.8 are admirable and point the City toward a more equitable, walkable, and economically successful future. However, some of the language is vague and needs clarification, such as defining "strong pedestrian and transit", and what happens with old drive-throughs. What are the criteria for establishing areas where "strong pedestrian and transit orientation is desired"? What incentives will be available, and what happens with city owned spaces? Can the City pass ordinances to enforce development to be more pedestrian friendly?

Built Environment Measure E-5 "supports infill growth." However, the actions outlined are vague and unquantifiable. Words used are "prioritize", "focus", "accommodate", "include", "enable", but the actions are not quantifiable or enforceable. No specific outcomes are defined the document characterizes the measure as "supportive" and projects no associated GHG emission reductions. We can only read this as unwillingness on the part of the City to take decisive, effective, and necessary actions. We see lost opportunity. Land use patterns should change as City priorities change. If land use decisions continue to be driven by narrow, short-sighted financial contingencies, we can expect only more sprawl and soaring Vehicle Miles Traveled (VMT).

Rather than "promote infill" the City should disallow sprawl development. Developers operate within allowed parameters. Homeowners modify their properties according to zone and code requirements. Developers and homeowners respond to incentives. Voluntary compliance is preferable, but in the absence of sufficient incentives, the City must mandate climate friendly choices. This is the only reasonable choice in the context of climate crisis. 85% of current regional VMT rates should not be considered acceptable for new development.

When establishing Sustainability and Carbonization Standards in LUP-A.5, the City commits to evaluating best practices for decarbonization in our infrastructure but does not set a timeframe for completion. Nor does it set criteria, or even commit to the recommendations from the evaluation to be implemented. Other recommendations to the following sections:

- M-1.39 To be able to fund shared use paths throughout Sacramento, the City must reduce lane miles to (1) encourage residents to use an alternative form of transportation, and (2) to reduce wear-and-tear on City roads.
- M-3.1 Most neighborhoods are already established within Sacramento. Describe how street trees be included in neighborhoods that are already established, especially those in heat islands.

- M-4.3 The City commonly cites its Vision Zero plan but does not identify clear steps or funding to reach that goal. Little work has been done to reduce speeds through slow street design features, the most effective way to make streets safer. The City has many streets that need improvements to make them safer.
- M-A.10 Addresses street design standards. The City must ensure these design standards are aggressive to address the heat island effect and the safety of cyclists, walkers, and other AT.
- M-A.3 We have studies from Vision Zero, but these corridors are dangerous and continue to be dangerous year after year. Please do something about it instead of studying it yet again. Bollards. Cones. Anything.
- M-3.2, M-4.2 There must be goals for minimizing driver speeds. The City should set new speed limits for residential areas and the rest of the city to improve safety of AT. State what they will be.
- Traffic Calming – State how the City will determine which methods are the best to use and establish a goal for traffic calming. FB-LUP We want safer, more walkable streets. As a positive example, North of 14<sup>th</sup> and Stockton, there are many stores that sit against the sidewalk. This is great! We need more of this so that people who walk can get to stores without having to cross hot, empty parking lots.
- Other considerations for M sections – More bike parking needs to be visible and available to prompt residents to bike instead of driving. Bike parking should follow best practices and be convenient .

Funding is the biggest challenge the City faces for sustainable planning and development, and this is identified in M-1.41. Roads are expensive. At every opportunity the City should consider how to reduce spending on repaving roads, reduce lane miles and increase density. Alternate modes of transportation are encouraged by the actions set out in M-4.8 and YPRO-1.21. Comfortable detours would significantly reduce the burden on people using AT, and more trees would improve comfort while walking and biking, especially in historically disadvantaged neighborhoods.

Equity is a major goal in the *Considerations for Achieving Carbon Neutrality* section: “Sacramento’s under-resourced communities are likely to face the greatest impacts from climate change and are Sacramento’s communities with the fewest resources in terms of ability to harness technology for adaption” (73). **With this consideration, the goals outlined in the CAAP should be equitable and provide the most opportunity for our most vulnerable residents.**

Our current transportation patterns and development sprawl are the product of historical land use decisions. Given sufficient political will and leadership, the City could alter historical land use patterns to achieve reductions in GHG emissions and a more livable city.

### **Built Environment and Housing**

To meet the goals set out in LUP-A.9, the City must rezone many neighborhoods to allow for mixed use commerce such as grocery stores, restaurants, coffee shops, and other light commercial uses to encourage walkability. This can be encouraged by providing sufficient urban canopy and utilizing native and climate-adapted plants, as outlined in (FB-ERC-1,ERC-3.2, and ERC-2.4). More Detail can be provided about how this would be done. Many of these changes can be made by the City Council passing an ordinance allowing the changes.

In FB-ERC-1, the City needs to invest in Fruitridge and Broadway because they are historically underserved neighborhoods and lack a substantial tree canopy. More trees need to be planted in this area immediately, and the City needs to plant trees near walking spaces using creative means, such as cutting into the street near the walking area for placement. This would have an added benefit of slowing traffic and improving pedestrian safety. This is preferable to trees planted in street medians, as these trees provide little sidewalk shade. Additionally, the City must take immediate action to increase parking lot shade to reduce the heat-island effect in all neighborhoods in Sacramento (ERC-3.10) through planting trees or covering lots with solar panels.

Finally, various land use maps (Land use diagram, maximum FAR diagram, and minimum density diagram) need to reflect the language set out by the GP to increase transit-oriented development and density near light rail stations in LUP-2.4, LUP-4.1, LUP-4.4, LUP-4.5, and LUP-5.3.

### **Water**

ERC-3.9 works to conserve our natural resources, stating “The City shall encourage appropriate watering practices and irrigation to minimize needed water use and support healthy tree growth; support responsible tree irrigation during droughts to minimize tree stress and loss; and convert irrigation in parks and streetscapes where needed.” The City needs to improve education and outreach on these practices, and to incentivize conserving valuable drinking water. What measures/goals will the City use?

### **Transportation – Active Transportation**

The City establishes that in M-1.3 that it "shall plan and make investments to foster a transportation system that improves the health of Sacramento residents through actions that make AT, non-motorized modes, high-occupancy, and zero emission vehicles (ZEVs) viable, attractive alternatives to the private automobile." Incentivizing non-Single Occupancy Vehicles (SOV), which includes both cars that use gasoline and electric cars such as ZEVs, is an important step in transforming the way residents move around, but this is diluted by including ZEVs in the list of investments. ZEVs should be their own line item, as there have been decades of infrastructure built around SOVs.

However, AT needs to be the highest funding priority. In M-1.4, throughput is incentivized, but not specified. More concrete information is needed about what “prioritiz[ing] person throughput” means, what types of “more efficient travel modes” are, and what the threshold for success is. Transportation also is identified as a major emissions contributor; it contributes 57% of the Green House Gas (GHG) emissions within Sacramento, and the CAAP stresses the importance of drastic changes in this sector. Mobility is a vital right of every resident, and the CAAP states that AT and Transit & Shared Mobility (TSM) are the keys to achieving carbon neutrality. Unfortunately, the target date of 2045, is too far out to have a significant impact on the wellbeing of residents in the coming decades.

Street space is extremely limited in Sacramento, and it is not possible to make every street a complete street. Even so, the City needs to identify how they want people to travel and prioritize which street designs and standards are the most conducive to this (M-1.5). For example, because AT takes more physical energy, in an effort to encourage it the City should allocate direct routes to high travel locations, such as downtown, to AT only. Because less energy is needed to use SOV, parking for destinations, such as for central city, should be rerouted outside of the grid with the implementation of a “Park-and-Ride” system. This would increase the safety for walkers downtown and increase foot traffic to small businesses, which improves tax revenue. This also assists in reaching our Vision Zero goals. M-1.11 ties into the action above by stating, "The City shall strive to increase bicycling and walking citywide so that it can meet its equity, reduced vehicle miles traveled, and sustainability goals." However, the wording for this item is extremely weak with the inclusion of “shall strive.” The City must set specific, measurable goals to increase AT citywide.

M-1.12 is equally non-specific. It states “the City Shall foster additional walking and bicycling connections to light rail stations and strengthen existing connections to enhance first/last-mile connectivity...,” and this is restated in M-1.25. The language used in this measurement is weakened by the use of “shall foster” instead of “will create” or “will prioritize.” M-1.17 and M-1.18 identify two other areas that limit bikability, but the commitment in the language is non-committal and vague. The City should prioritize funding from the general fund to build this infrastructure, the same way it does for roads used by SOVs. Likewise, M-1.18 must remove "whenever feasible" from the action item. Bikes and cars should be separated to prevent fatal injuries. This is vital for reaching our Vision Zero goals.

M-1.13 does not have language that commits to generating revenue for small businesses through walkability. Again, the City will “promote walking by including design elements” rather than prioritizing walking by implementing, wherever possible, the elements identified. Shade trees, wider sidewalks, and crossings are all part of walking facilities identified in M-1.14. The City only identifies grant funding to build these features. If we only built or repaved roads with grant funding, we would have far fewer roads in our city and people would be severely hampered in traveling. Walking should be a priority, and walking should be safe. Again, M-1.19 uses weak language that the City will “prioritize designs that encourage walking” rather than learning from the design principals for safe walking that other communities have identified, such as the [Global Designing Cities Initiative](#).

Improving access to transit is another admirable goal, and M-1.6 states “the City shall design buildings, the public realm, streets, and pedestrian access to integrate transit into existing and proposed developments and destinations such as employment centers, commercial centers, major attractions, and public walking spaces to improve access for users by transit,” but does not establish what the City will be willing to do to make these changes. The most straightforward way to solve access to transportation for users is to create frequent and reliable service. While the City does not run SacRT, it is responsible for the streets and must work with SacRT to establish Bus Rapid Transit (BRT) corridors throughout the City. This is the only way to fulfill the City’s goal to plan the transportation system with equitable outcomes and investments (M-1.9). The GP needs to commit to incentivizing transit use throughout Sacramento and return the streets to people.

Unfortunately, the CAAP has not incorporated significant changes from the last set of comments. Actions such as TR-1.4 are still cited in the plan even though people will only use AT facilities if they feel safe doing so. Many residents do not feel safe using AT because of speeding cars on our streets. TR-2.2 and TR-2.3 do not clarify how they will develop parking maximums or encourage expansion of reliable transit and must provide more detail. And some actions, such as TR-2.4, TR-2.5, and TR-2.10 can be facilitated by the City closing roads to SOVs

TR-1.5 identifies a need - securing ongoing funding for AT programs. This must be a priority. Historically, there has been no general funding for AT in the yearly City budget. Whether or not someone drives, the City is using everyone’s tax money towards fixing roads for SOVs, even if they do not drive, and yet the City does not invest in transportation that non-car drivers utilize. To achieve its goals, **the City needs to invest heavily in AT.**

The methodology used to justify CAAP measures is sometimes speculative and naïve, this is especially evident in AT. The AT Measure TR-1 seeks to reduce GHG Emissions through improvements to infrastructure, with a goal of increasing AT mode share by 200%. By way of evidence, the document summarizes the characteristics of cities which bear some similarity to Sacramento but enjoy a higher AT mode share. We learn many of these cities “do not just build infrastructure. They also require car drivers to pay their own way with higher parking fees, gas taxes, and excise taxes on new vehicles. These cities also incentivize dense multifamily development.” (Appendix C, 20). We also find the successful cities have other differences including demographic, socioeconomic, climactic, and political. Despite the many differences between Sacramento and these cities, the analysis relies exclusively on infrastructure and the long-term policy to “encourage” infill to alter longstanding transportation patterns. “Assuming that bike lane mileage, density, and city population are directly correlated with bicycle mode share, Sacramento could expect to see a similar level of bicycle mode share that Antwerp saw...” (Appendix C, 20). Correlation is not causation.

AT Measure TR-1 is simplistic and unsubstantiated. It is likely the proposed improvements to infrastructure will contribute in a positive way to AT. But we have no reason to conclude it will be sufficient or result in the targeted decreases in GHG emissions. AT Literature suggests such predictions are problematic. “...Measuring bikeability (is) extremely challenging and geographically specific, as extrapolating the methods in one city to another may not match reality, and factors affect each place differently”. Factors influencing cycling include

distance, environmental awareness, convenience, the need to exercise, affordability, bikeway exclusiveness, bikeway density, time of day, weather conditions, theft risk, trip purpose, and social status. Evidence suggests bicyclists feel safer and are more likely to cycle when there is a high density of cyclists. There are socioeconomic factors as well, and the City must research interdisciplinary perspectives such as those found in the [\*Built environment bikeability as a predictor of cycling frequency: Lessons from Barcelona\*](#) (December 2022).

Improving Sacramento's AT infrastructure will provide valuable and desirable co-benefits to residents. We are unequivocally in support. But cities that have achieved high AT mode share have demonstrated commitment through significant modifications to infrastructure, land use, fee structures, and taxation to achieve it. We are deeply disappointed to see the City promote simplistic actions rather than grapple authentically and realistically with the complex underlying issues.

### **Transportation – Transit**

Many of the Drafts' measures, specifically in the CAAP, require the action of entities outside of the City's control. The Drafts list SacRT, SMUD, SACOG and others as the lead agencies for many actions. Except for SMUD, we know of no established contracts or agreements. No evidence is provided that substantiates the inclusion of these measures per CEQA guidelines. The measures are neither proven nor enforceable. For example, in Measure TR-2.4, the City plans to "collaborate (with SacRT to) implement increased transit services and expanded service lines." In measure TR-2.8 the City will "support SacRT efforts to secure funds." Support isn't defined. The sources of funding have not been identified. The feasibility of the City's plans for SacRT is unknown.

We agree that the City must prioritize collaborating with SacRT and provide the public infrastructure to support high-frequency transit service in the community. The City can implement street designs, etc. to get riders (M-1.20). The City cannot meet its goals in M-1.22 if it does not take drastic steps to improve the streets for transit. For example, the City could facilitate closing direct route surface streets to through traffic, but allow Bus Rapid Transit, biking, and walking along those corridors. This would equalize the time it takes to get to a destination, which would incentivize transportation outside of SOVs. We need better than just "supporting transit by incorporating features" that will improve transit reliability. We need a firm investment in transit priority infrastructure (M-1.23 and M-1.24). M-A.8 addresses BRT down Stockton Boulevard which is the sort of vision we need in order to adjust how we move around the City. Unfortunately, this goal is caveated by "as funding is available." This is an area where the City needs to change priorities and change what types of transportation it invests in. Reforming our current infrastructure to prioritize non-SOV transportation is not only vital for improving safety, but it is the fiscally responsible decision. Daily wear and tear from SOVs, especially the even heavier ZEVs, costs the City millions in deferred maintenance. The vision for Stockton Boulevard should be implemented to other major corridors, such as Fruitridge Road, Broadway, and Del Paso Boulevard.

Measure TR-2 calculates reductions in GHG Emissions resulting from unspecified improvements to the SacRT system. No detailed plan is stated. Emissions reductions cannot be calculated in the absence of a defined plan. GHG emission reductions can't reasonably be derived from a general intention to improve transportation and increase density. Increasing the frequency, location, convenience, and perceived safety of public transportation is necessary to increase public transportation mode share. We are unequivocally in support. But changes in land use and other policies will be required to change transportation patterns. We are looking to the City to adopt a more evidence-based comprehensive approach to transportation.

Providing free or discounted fare for certain groups of transit riders, such as students, low-income residents, and seniors is a wonderful program, and the City should keep this as a priority to change how youths see transportation (M-2.7).



Promoting Shared ZEVs across Sacramento is a great bridge as we reduce the need to own an expensive SOV, and M-1.29 identifies this. Unfortunately, as the Car Share Program is no longer available, no further reductions in GHG emissions should be attributed to the program (Measure TR-2.6), and yet, the CAAP still refers to it. While the AAA Car Share program, also known as GIG, was successful in reducing VMT, the program has been terminated due to insufficient participation rates. Whatever support the City provided was not enough to make it commercially viable. Anecdotal evidence suggests the cancellation has resulted directly in unplanned and unwelcome vehicle purchases. Had the City worked more closely with AAA the outcome may have been different. This calls into question the role of city “support” in promoting climate friendly programs. Is there adequate staff to monitor these programs, and does the City have the resources to intervene when necessary? Beyond the non-committal language in M-2.1 and M-2.4 stating the City “should promote” use of alternative transportation, it ignores that 52% of all car trips in the US are 3 miles or less, and 28% of those are 1 mile or less ([Bureau of Transportation](#)). Residents of Sacramento drive because it is not safe or convenient to travel in any other way even if our destination is only one mile away. The City has the power to change this, though. M-2.6 and M-2.8 “Transit/Event Coordination. The City shall encourage collaboration between transit partners and event producers to promote awareness of additional and timely transit service before and after large events.”

### **Transportation - SOVs and ZEVs**

The Drafts declare that we need to reduce SOV, but don’t adequately prioritize shifting people’s behaviors. People need viable alternatives that meet most of their needs reliably (8-15). Regional Transit should not just be for commuting. **It is vital for everyone, especially residents who are blind or disabled, to meet their daily needs** including getting groceries, going home, to work, to the gym, to events, and to social gatherings. A major limitation is that the City has not incentivized people using transportation other than SOV up to this point. This can change if ample parking is removed, remaining parking is on the outskirts of town, car speeds are reduced, and toll roads are implemented. Parking supply, as stated in M-2.14, does not disincentivize additional parking, it only acknowledges that there is a correlation. What are the specifics of what the City will do to significantly decrease VMT to cultivate a safe and walkable City where residents are encouraged to window shop from the sidewalks and wander into businesses they would have passed if they were driving?

In TR-3.7 in the CAAP, the City identifies that having access to chargers for ZEVs for people who otherwise do not have them at home is important, and it is. However, it is a better investment of the City’s funds to put the money towards AT instead of investing in new SOV infrastructure, even if they are ZEVs. The funding section in the CAAP identifies AT as a high cost because it accounts for the years of funding that haven’t been put into AT. Entire bicycle and walking networks need to be created because space has never been dedicated to it. On the other hand, new ZEV infrastructure is rated as a low-cost option but fails to account for the wear and tear on our roads, which require costly pavement, and the maintenance of the traffic lights, signs, signals, parking space, and lost revenue from the land that is dedicated to parking or a road instead of businesses. Not least of which, this does not account for the deaths that cars, ZEV or not, are responsible for. We cannot afford to continue prioritizing and investing so heavily in any SOV.

### **Connectivity**

An interconnected City is vital for addressing our transportation emissions, but LUP-2.2 and 2.3 do not establish how the City will establish and encourage transit and AT, nor is there a commitment to any steps to creating this vital infrastructure. LUP-2.5 goes on to discuss the design for connectivity but does not establish what will happen to the current connections and how the City will build them out. The City needs to determine how to improve these connections so that people who do not normally use AT will find them comfortable and convenient to use.

## Recommendations

The Drafts' chapters are intertwined with each other and a solution for one is likely to be a solution for many. Because of this, similar topics should address all parts of the Drafts where they are brought up.

The Drafts consistently use vague, non-committal language and/or caveats otherwise powerful statements. Words such as, "encourage," "promote," "should," "explore the feasibility," and "shall foster" must be eliminated from this document and replaced with words that reflect the necessary changes we need in our communities, examples of such language are "will," "implement," and "actively partner with."

We understand these are long-term planning documents, and that the Drafts do not prescribe the specific solutions to the challenges the City faces in the upcoming years. However, this guideline document needs to prioritize the changes that must happen to create the livable image of the future Sacramento described in its pages. To achieve this, the Drafts must produce a significant shift in:

1. Sacramento's transportation priorities. The City has invested heavily in expensive, car-centric infrastructure over the past several decades. This has led to a less safe, less walkable, and less desirable downtown and city. Return streets to people.
2. Funding priorities. Many of the goals set out in the Drafts are under or completely unfunded. The City must allocate regular General Funds to pay for these necessary aspects of life, such as housing and transportation. Further, if the CAAP is implemented, the City must provide adequate staffing.
3. Building density. Increase the FAR across Sacramento to 2.0, encouraging communities to build up over time rather than precipitate the rapid growth that causes displacement.
4. Quantifiable, time sensitive goals and measures. Recommend concrete, measurable objectives in each IA section that boldly addresses the issues at hand. This must include Key Performance Indicators (KPIs) and a specific deadline for each.
5. Update the following diagrams to reflect the FAR stated in the GP: (1) Land Use, (2) maximum FAR, and (3) minimum density.
4. Establish goals and measures commensurate with the severity of our circumstances. "With less than 30 years remaining to reach this goal [of carbon neutrality by the middle of the century], the CAAP sets new and ambitious targets for the City" (1). This goal clearly establishes that "ambitious targets" are needed to meet carbon neutrality by 2050. However, we are already feeling the devastating effects of climate crisis with oppressive heatwaves, continual drought, wildfires and water shortages. Considering current reality, a goal of 2050 will be too late.

Far too many of the City's decisions appear guided by political considerations. If measures are voluntary and unenforceable, virtually no one will be inconvenienced, and nothing will change. The addition of shade trees, bike paths, and walkways will always be welcomed. But real change, that changes required to avert climate disaster are controversial and uncomfortable. Both the housing crisis and climate change are happening now and need to be addressed. To make the level of change necessary to address these problems, the City needs to act boldly and with urgency. The City must commit significant funds to achieve these goals. These actions must be part of a comprehensive plan that focuses on shifting how we move and where we live in Sacramento. By avoiding real change now, the City is ensuring far greater controversy and hardship in the years to come.

Sincerely,

/s/

Elizabeth Barrett

Member, Citizens' Climate Lobby, Sacramento Chapter

/s/

Kay Crumb

Member, Citizens' Climate Lobby, Sacramento Chapter

cc: Darrell Steinberg, Mai Vang, Caity Maple, Katie Valenzuela, Karina Talamantes, Lisa Kaplan, Rick Jennings, Sean Loloee, and Eric Guerra