

SIERRA ● CURTIS  
Neighborhood Association

April 13, 2009

Heather Forest,  
City of Sacramento  
300 Richards Blvd., 3<sup>rd</sup> Floor  
Sacramento, CA 95811

**RE: Curtis Park Village (P04-109) – Project Notification Response**

Dear Ms. Forest:

The Sierra Curtis Neighborhood Association (SCNA), on behalf of Curtis Park neighbors, objects to the Curtis Park Village Plan (P04-109) as currently proposed.

We stand by our comments submitted in response to the Early Project Notification on October 23, 2007 which we will restate below. We are pleased that multi-family housing has been added back into the plan and there is now affordable housing for seniors, but the majority of our concerns have not been addressed in the current version of the plan.

The Land Park Community plan, (a section of the City of Sacramento General Plan, March 2009), designates this parcel as an infill opportunity, proposed to be a traditional neighborhood and a traditional center. ***We object to the currently proposed plan because it attempts to impose an over-sized, suburban-style, auto-oriented development on two traditional, pre-war neighborhoods, located between two light rail stations. This is a significant missed opportunity for “smart growth” within the City of Sacramento.*** It is also important to note that, as proposed, this project does not meet the City’s definitions of a traditional neighborhood or traditional center.

We are aware of and understand the financial situation and general economic conditions developers currently face. The SCNA board and the neighborhood have been generally supportive of Mr. Petrovich’s efforts. For example, we wrote letters of support regarding the revision of the Remedial Action Plan (RAP) and for obtaining Prop 1C funds. We are pleased Mr. Petrovich has pursued public/bond funding for clean-up, infill housing, transit and infrastructure improvements and encourage him to pursue reasonable financial incentives to make this project pencil out. We do not believe, however, that these circumstances should compel us or the City of Sacramento to accept a project that may be financially viable in the short term but does not serve the surrounding neighborhoods or the city well in the long run.

We, as Curtis Park neighbors and citizens of Sacramento, expect a forward-looking, state of the art project for this unique infill development site. There should be no urgency on our part or the city’s part to take “what we can get from this project.” We are willing to make sure this valuable infill project is all that it should be and no less than the current and future residents of this historic area and the city deserve. We agree with and support the City’s statement that it has a responsibility to foster “walkable, close-knit neighborhoods, distinctive, attractive communities with a strong sense of place, and supporting land use...that reduces vehicle emissions and improves air quality” (*The City of Sacramento’s Smart Growth Implementation Strategy, 2001*).

We believe this project should not only meet the goals of the SACOG Blueprint but exceed them. Given increased understanding of global climate change, we support the goals of recently adopted legislation, including AB32 (the Global Warming Solutions Act of 2006) and SB375 (Redesigning Communities to Reduce Greenhouse Gases), which specifically targets auto emissions by reducing vehicle miles traveled.

We do not support this project as proposed because it continues to represent an outmoded model of development – the conventional auto-oriented suburban shopping center that is regional in scale, rather than a neighborhood-serving traditional center. The current plan is a far cry from the original ideas Petrovich presented to the community that would make this a model, neighborhood friendly, infill development.

We offer these additional comments in relation to the current project proposal:

### **I. Size and design of a “*Shopping Center-PUD*”**

We have repeatedly asked for, and the City of Sacramento should demand, a traditional village (rather than “shopping center” PUD) and transit-oriented development. According to the city’s definition, “Community Neighborhood Commercial and Offices” offer goods and services for the daily needs of adjacent residential areas.

The overall commercial square footage in each plan submitted over the years by Petrovich Development has increased from 118,000 to the current level of 258,641 sq. ft. A standard rule of thumb offered by the developer is that a 55,000 sq. ft. grocery store expects to serve 15,000 households. A commercial project of 258,641 sq. ft. would likely require support from a large number of households a broad geographic area in order to be successful.

We do not believe a commercial development of 258,641 sq. ft. can be supported by the adjacent neighborhoods, or is economically sustainable. As a “destination” development, it can be expected to generate an increase in vehicle trips from outside the adjacent neighborhoods.

Curtis Park has approximately 2,400 households and, at present, 24<sup>th</sup> St. (a residential street which serves as a collector) accommodates 4175 vehicles daily (per draft traffic study). The developer contends that most CPV traffic will utilize Sutterville Road. We do not know the basis for this assumption and believe that drivers, in order to avoid Sutterville, will choose the path of least resistance – through the neighborhood.

Even though the developer has assured neighbors that there will not be a Wal-Mart in CPV, if the project is designed as big box with flexible spaces (spaces that can be joined to produce much larger stores), there is little in the city’s regulations to prevent any particular use from occupying the space. Thus, we restate our concern about the control of the maximum sizes of buildings and spaces within the PUD.

The developer cites the Raley’s / Rite Aid complex on Freeport Blvd. (which spans two long blocks) as an example of similarly scaled projects. We would like to point out that the Freeport corridor and neighborhood were established in the post-war years and were built to serve the automobile. Thus, the Freeport Blvd. Raley’s is not a model for the Curtis Park Village traditional neighborhood center.

In order to maintain the atmosphere of the community which consists of small-scale homes and businesses and quiet, safe streets, and to fully take advantage of the opportunity that this in-fill parcel represents, we recommend:

A. A decrease of overall commercial square footage. The previous draft traffic study indicated that 100,000 square footage of commercial would generate approximately 14,000 daily trips, a number which is acceptable to the neighborhood. This is a more appropriate commercial size because it:

- Generates less out-of-area auto traffic;
- Requires less parking overall and would allow the elimination of the suburban style parking lot;
- Supports Residential-Mixed Use and TOD that require much less overall parking and significantly less green house gas emissions.

B. Re-design the commercial center to conform to the City's definition of Traditional Center, which provides:

- Central public gathering places (such as a plaza or village square);
- Blocks are small and rectangular, allowing for convenient pedestrian access from adjacent areas;
- Lot sizes are relatively small and narrow, providing a fine-grained development pattern;
- Building heights that generally range from 1 to 4 stories (taller heights are acceptable if supported by context and market);
- Buildings and building entrances are sited at or near the sidewalk;
- Rear alleys and secondary streets provide vehicular and service access, thereby reducing the need for driveways and curb cuts on the primary street;
- Building frontages are transparent with pedestrian-scaled articulation and detailing; and typically abut one another. Employ a street grid with reduced, dispersed or rear-oriented parking.

*(General Plan Draft Land Use and Urban Form Workbook, May 2007)*

C. Reinstate a residential component into the commercial center, making it a truly mixed-use village. We are happy to see the "brownstone" housing lining the entrance to the project, but the residential-over retail and live-work units have disappeared from the current plan. We believe there is a particular need and opportunity for more housing near the southern end of the project, given its proximity to City College and the City College light rail station.

- Multi-floor properties would allow flexible uses – upper floors as housing, offices or classrooms, depending on the need at any one moment.
- Apartment suites are ideal for the college population that would likely to walk to school and work, and use transit.

## **II. Housing Dynamics**

In general, the amount of housing in the project has declined. In some cases lot sizes have increased beyond the standards of the existing neighborhood, which means resulting houses will likely be bigger and more costly than current single family homes in the neighborhood.

Curtis Park has a wide variety of rental housing in the form of granny flats, duplexes, triplexes, fourplexes, cottage apartments and small apartment complexes, integrated seamlessly into the single family homes which are the dominant housing type in the neighborhood. We believe the project should offer more housing units and a wider variety of ownership housing types and sizes, including RMX and live-work units.

The affordable senior housing is a great addition to this area. We are pleased with this housing option. In general, however, the project still lacks affordable ownership options integrated throughout. We believe the smaller carriage houses adjacent to the rail yard (a component of an earlier plan) would be excellent candidates for affordable housing, as would the allocation of some of the multi-family rental units.

As currently designed, the non-ownership options include the multi-family complex with 212 units (Mr. Petrovich has indicated that he will maintain ownership) and the senior project of 80 affordable housing units. There are 128 traditional single family lot homes, 34 brownstone townhomes, and 15 additional infill cottage homes on 24<sup>th</sup> St. which we expect will be sold to private home owners, for a total of 177 ownership-potential homes. Of the 469 residential units, 38% are ownership potential and 62% are rental units. We believe this amount of rental housing is too much for CPV and would significantly alter the owner-rental dynamic of the surrounding neighborhoods. While we support appropriate density and the provision of affordable senior housing, we urge a revision of the apartment complex model to a model that offers greater diversity and the ability to provide higher density, owner-occupied housing types.

## **III. Transit-Oriented Development**

A bona fide Transit-Oriented Development (TOD) would feature medium-density housing, reduced number of parking spaces, mixed-use commercial, prioritized pedestrian and bicycle access throughout the project and maximized access to both the light rail stations to the west of the project. Such a configuration represents what this development needs to look like to be viable in 20-50 years due to the impacts of climate change and the rising costs of energy and transportation. The development of a TOD supports the goals of the recently passed SB 375 which requires sustainable land use planning. A recent Urban Land Institute report addressing climate change concluded that, “one of the best ways to reduce vehicle travel is to build places where people can accomplish more with less driving.” (*The Sacramento Bee*, September 23, 2007, page E6.)

A safe, convenient connection to the City College light rail station is a priority for the Curtis Park neighborhood and will be a tremendous benefit for the future residents of CPV. It will equally benefit City College students and college staff who may wish to shop, work or live nearby. Many new residents could join existing residents who travel by transit, lessening the carbon footprint of this project. The combination of land use and light rail connection would epitomize the smart growth goal of “reducing vehicle emissions and improving air quality.” Though a feasibility study for a pedestrian bridge is underway, we urge the City to

take the lead to ensure optimal space allocation in the development and to coordinate multiple funding sources to build a pedestrian connection.

Further, the neighborhood recognizes the value of obtaining good pedestrian access to the 4<sup>th</sup> Ave/ Wayne Hultgren Station. We desire that safe, easy pedestrian access to this station be developed as part of whatever road configuration is selected at the 21st Street access point to the proposed CPV.

In the current plan, the large parking lots and unclear access to the light rail bridge discourage pedestrian and bicycle users. On-street bike lanes that are clear and easily accessible should be identified and comfortable to navigate between the existing neighborhoods and the new residential and commercial CPV development, including bike routes and walking paths. We advocate for the use of narrow streets (no overly wide collectors), separated sidewalks, and as many connections as possible between the existing neighborhood and the new development. This would also include linked alleys. After review by several bike and pedestrian advocacy groups, SCNA will supply more detailed comments regarding bike and pedestrian amenities for CPV.

#### **IV. Mitigation of toxic contamination at the site**

SCNA recognizes that significant uncertainty exists regarding the extent of the toxic contamination and requirements of the California Department of Toxic Services and Control. We will continue to advocate for land use decisions that comply with the City of Sacramento's existing land use designations, its Smart Growth Implementation Strategy and its Sustainability Master Plan. While we recognize that the economics of the toxic clean-up process are challenging, the neighborhood should not be asked to accept a project configuration that is dictated by the demands of a toxic-cleanup plan. A large, suburban-style parking lot is not acceptable simply because it offers a convenient place to "entomb" toxic dirt from elsewhere on the site. We look forward to continued dialog with the City of Sacramento and the State of California with regard to this issue.

#### **V. Design Guidelines**

The Design Guidelines submitted with the project application lack sufficient detail. The developer should create thorough design guidelines that ensure that CPV develops in a style and scale that is complimentary and compatible with the existing traditional neighborhood. Because of the importance of Design Guidelines to establish the quality and character of the future CPV, we are undertaking a professional review of the Design Guidelines. The findings will be submitted under separate cover.

Provisions need to be in place for future of the PUD when the development occurs. We do not believe that Petrovich Development Co. can serve as the decision maker regarding the adherence to and approval of projects with in the PUD. A design review board, whose members should balance the rights of the property owner and the interests of the neighborhood, should be mandated to review special permits and housing designs.

#### **VI. Transportation and Circulation**

A. Please provide the plans for the Sutterville and Road A intersection, including the reconfiguration of the South of Sutterville neighborhood. If reasonable traffic and circulation (i.e. heavy truck traffic) is dependent upon this intersection, the approval of CPV should include a parallel timeline for completion.

B. Please provide a large-scale tentative subdivision map. The maps attached to the application are unreadable. It appears that the road around the green (Donner main extension) is one-way. Roads E should cut through the “green” and connect with Road I as it did on earlier plans, so traffic can easily enter and exit via 21<sup>st</sup> St. The developer should indicate which roads in the PUD correspond to the road diagrams on the tentative map. Street diagram “C,” a local residential street with on street sidewalks, should not exist in CPV. Are street sections “E” (minor collector), “F” (4-lane arterial) and “G” (2-lane arterial) proposed to be in the project?

C. Connections should be maximized, specifically; 21<sup>st</sup> St. and 10<sup>th</sup> Ave. should provide auto ingress and egress in order to bear some of the traffic burden that will occur at Road A/24<sup>th</sup> St., 5<sup>th</sup> Avenue and Donner Way.

D. We wish to see alleys established for all the single family homes. This conveniently provides two curb cuts (one at each end of the block) for autos rather than curb cuts at each house for a driveway. As a design issue in a traditional neighborhood, autos should not be parked where the front lawn should be.

## **VII. Other comments**

A. What is the park space required for this 76 acre project? The city’s sewer upgrade of the Donner Main, designated as open space on the plan, should not be counted as part of the required open space. Additional open space should be allocated to a public plaza in the commercial area and pocket parks throughout the development.

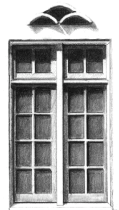
SCNA is in the process of reviewing the Draft Environmental Impact Report for Curtis Park Village that was released last week. We will forward additional comments related to the DEIR process under separate cover.

Thank you for the opportunity to open a dialogue regarding the CPV development.

Sincerely,

Rosanna Herber, President  
Sierra Curtis Neighborhood Association

Cc: City Councilmember Lauren Hammond  
Petrovich Development  
Mayor and City Council members



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