

SENT VIA EMAIL TO Jschenirer@cityofsacramento.org

February 25, 2015

Councilmember Jay Schenirer and Members of the City Council
City of Sacramento
915 I Street, City Hall
Sacramento, Ca 95814

RE: General Plan Amendments 2035, Mobility Section, Goal M 1.2.2

Opposition to the Expansion of Level of Service (LOS) F and Designation of Additional City Streets as LOS E and LOS F, as Proposed in the General Plan Amendment 2035.

Dear Mayor Johnson and Members of the City Council:

The following comments are submitted in response to the City of Sacramento's (the "City") proposed Amendment to the General Plan (the "Amendment"). We believe that designating streets as LOS E and LOS F without adopting appropriate mitigation measures or a statement of overriding considerations frustrates the purpose and effectiveness of the California Environmental Quality Act (CEQA). The LOS E and LOS F designation contained in the Amendment would eliminate CEQA's requirement to mitigate significant traffic congestion impacts for future projects in these designated areas.

We agree that simply widening or modifying congested streets to accommodate increased traffic volume, speed, and risk is not desirable. However, reducing acceptable LOS standards goes well beyond accomplishing this goal. Because a CEQA lead agency can only legally impose mitigation for significant traffic impacts, lowering the standards to LOS E and F effectively prevents the City from imposing any forms of mitigation other than street widening (e.g. alternative transportation options, pedestrian crossings, public transit enhancements, etc.)

We are aware of City staff's public representations that, notwithstanding the LOS E and LOS F designation, the City still will evaluate the traffic impacts of some new projects. But these informal assurances can change over time and cannot substitute for the rights guaranteed to the public by CEQA. What is more, the value of such traffic studies is highly questionable in the absence of any authority to actually impose mitigation for such impacts. Thus, it appears to SCNA and other neighborhood organizations that Mobility Goal M 1.2.2 is a giveaway to developers cloaked as a progressive land use policy.

As a result of this proposed action, the entire Land Park and Curtis Park residential areas would become encircled by LOS E and LOS F roadways (Broadway, Freeport and Sutterville) and not require mitigation. In addition, accepting LOS E within 1/2 walking mile of a Light Rail station would prohibit traffic mitigation that, in turn, would heavily increase traffic on residential streets.

Mayor Johnson
February 25, 2015
Page 2 of 2

In Curtis Park and Land Park, this would include all streets near the following Light Rail Stations: Broadway and 19th St; Freeport and 4th Ave; and Sacramento City College, negatively impacting residential streets in the interior of Curtis Park and Land Park.

Negative traffic impacts would not be confined to streets designated as LOS E and F. If traffic flow at one intersection or street segment deteriorates, drivers will look for alternative routes. For example, poor traffic flow on Broadway, Freeport or Sutterville will spill over on to adjacent residential streets, including 5th St, Muir Way, Riverside Blvd, Land Park Drive, 11th Avenue, Vallejo Way, etc. Thus, LOS F conflicts with the City's General Plan policy to protect residential streets and neighborhoods from traffic.

In summary, we urge the City Council to take the following action:

- 1) **Do not expand** the City's Core Area with LOS F acceptance to include Alhambra Blvd and Broadway;
- 2) **Do not add** LOS E and LOS F for any roadways other than those already approved in the existing 2030 General Plan.
- 3) **Work with residents**, neighborhood associations and business groups near the streets anticipated to have traffic impacts to develop comprehensive solutions to alleviate congestion on streets neither deigned nor intended to carry the high volumes of LOS E and LOS F traffic.

Thank you for your consideration of our request to protect the City's unique urban neighborhoods.

Sincerely,

**SIERRA CURTIS
NEIGHBORHOOD ASSOCIATION**

By: 

Eric A. Johnson, President

Cc: City Councilmembers



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