



PATRICK GAGE
PRESIDENT

JOE CHAVEZ
VICE PRESIDENT

RIAN TROTH
TREASURER

VALERIE ROBERTS
SECRETARY

April 21, 2008

Re: C Street Business Park (PO7-138)

Chairperson Woo and Members of the Planning Commission:

This is not the first instance where the McKinley East Sacramento Neighborhood Association (MENA) has commented on the inadequacy of a traffic analysis for a new project. Each new project as it goes through the City's environmental review process is considered to be less than significant because it does not excessively impact intersection levels of service. Meanwhile, the livability of our streets in East Sacramento continues to be degraded. Many of us chose to live in East Sacramento because of its livable, walkable, bikeable and safe streets. The qualities we so desire are being eroded by the City's lack of an adequate threshold of significance for traffic impacts.

The Traffic Study utilizes the City's level of service (LOS) categories to determine whether increased traffic will have a significant impact. Under this limited approach, an impact would be significant if:

1. *The traffic generated by a project degrades peak period level of service from A,B or C (without project) to D, E or F (with project); or*
2. *The LOS (without project) is D,E or F and the project generated traffic increases the peak period average vehicle delay by five seconds or more.*

While this analysis is a necessary step in determining significance, it does not go far enough. CEQA requires that impacts be analyzed even if an impact meets an adopted standard, if circumstances indicate the project may nonetheless have a significant impact.¹ The City cannot rely on the LOS guidelines in a manner that precludes consideration of other evidence that the impact might be significant.² The City's Draft General Plan espouses sustainability and livability, yet the City's existing outdated Traffic Impact Guidelines do not foster sustainability and livability, they do just the opposite.

"C" Street west of the project site already carries 4700 vehicles per day (per Figure 1 of the Traffic Study). The project would add an additional 450 vehicles to that street every day (Figure 5). This street is classified as a local street, and these levels of traffic are inconsistent with the City's existing City's General Plan, which states that:

"Local streets are not intended to move through traffic. Volumes on residential local streets will typically be 2,000 or fewer vehicles per day but could be as high as 4,000 vehicles per day."

Even the 4000 level set in the Plan is too high. Donald Appleyard, in his seminal research work on residential street livability, concluded in *Livable Streets*³ that the maximum livability capacity for residential streets is 3000 vehicles per day and that

¹ *Berkeley Keep Jets Over the Bay Committee v. Board of Port Commissioners* (2001) 91 Cal.App.4th 1344, 1380-1382 (project that meet FCC noise standards could still have a significant effect if it caused a substantial increase in the ambient noise levels for adjoining areas); *Protect the Historic Amador Waterways v. Amador Water Agency* (2004) 116 Cal.App. 4th 1099, 1109-1111 (project meeting hydrology significance thresholds could still have a potentially significant impact because thresholds did not address all hydrology and water impacts of the project).

² *Mejia v. City of Los Angeles* (2005 130 Cal.App.4th 322, 342 (agencies can not apply standards or thresholds "in a way that forecloses the consideration of any other substantial evidence showing that there may be a significant effect)).

³ Appleyard, D. S., Gerson, S., and Lintell, M., *Livable Streets*, University of California Press, Berkeley, 1981.

2000 vehicles per day was the threshold above which residential livability was significantly impaired. Exiting driveways have become extremely hazardous and pedestrian and bicycle travel has become more dangerous. "C" Street west of the project site, a local street, has seen the livability of the street for residents significantly impaired. While higher traffic volumes than 2,000 to 3,000 vehicles per day may be appropriate in areas with higher density residential development and mixed uses, it is not appropriate in areas that are primarily single family residential in character.

In addition, the City's emphasis on traffic circulation ignores the fact that beyond simply moving traffic, urban streets often function as public spaces where people walk, ride bikes, meet and socialize with others. By considering traffic circulation alone, only one function of a street is being considered and the livability of the street for residents of this community is completely ignored.

Numerous cities across the Country have updated their traffic impact guidelines to address livability on local streets. The City of Portland has a significance threshold of no project related increase more than 400 vehicles per day and an absolute maximum of 3,000 vehicles per day on any local street. The City of Menlo Park's Transportation Impact Analysis Guidelines indicate that on local streets, a traffic impact may be considered potentially significant if the existing daily traffic volume is greater than 1,350, and there is a net increase of 25 trips or more due to project related traffic. Considering the impact of traffic on residents of local streets is not a new or unique concept, but it is one the City of Sacramento has chosen to ignore.

MENA generally supports infill development. However, infill development must occur in a way that does not degrade or destroy existing established neighborhoods. MENA believes that this is just the first of several projects that can be anticipated for the Cannery property. Future projects will not be appropriate unless the City adequately addresses the impact of increased traffic on neighborhood livability and develops mitigation programs to ensure that established residential neighborhoods, like the neighborhood along C Street remain viable.

MENA recommends that the Planning Commission direct staff to immediately initiate the process of updating the City's Traffic Impact Guidelines to address neighborhood livability and return to the Planning Commission within six months with a draft for your consideration.

MENA also recommends the Condition B9 be revised to read:

The applicant has agreed to contribute a sum not to exceed \$10,000 for neighborhood traffic calming measures that will include speed humps, a new crosswalk or other improvements deemed appropriate by the Department of Transportation in consultation with neighborhood groups.

Thank you for the opportunity to comment on this project.

Respectfully submitted,

A handwritten signature in cursive script, reading "Patrick Gage", is displayed on a light-colored, textured rectangular background.

Patrick Gage

President, McKinley East Sacramento Neighborhood Association

cc: Steve Cohn, Councilmember