

APPENDIX A

SACOG Consistency Determination



December 8, 2014

Scott Johnson, Associate Planner
Department of Community Development
City of Sacramento
300 Richards Boulevard, Third Floor
Sacramento, CA 95811

Dear Mr. Johnson:

You requested SACOG's concurrence that the proposed Sacramento Commons project is consistent with the Metropolitan Transportation Plan/Sustainable Communities Strategy for 2035 (MTP/SCS). SACOG provides a consistency determination at the request of the lead agency, although it is the responsibility of the lead agency to make the final determination on a project's consistency with the MTP/SCS.

In a June 4, 2014 letter to the City, SACOG concurred with the City's determination that the Sacramento Commons project is consistent with the MTP/SCS. In November, you provided us with another consistency worksheet (attached) that reflects some minor changes to the project description. We have reviewed these changes to the project and concur with the City's determination that the revised project is consistent with the MTP/SCS for 2035. The text below is copied from our June letter and has been edited using strikeout and underline to reflect the changes in project description.

Hotel Scenario – Project with Hotel includes ~~1,422~~ 1,374 housing units (approximately ~~1,316,430~~ 1,230,490 residential square feet) of varying density and product type, ~~965,522~~ 864,372 square feet of commercial uses (hotel, neighborhood serving retail and structure parking), and open space areas. The average residential density is ~~140~~ 136 dwelling units per acre. Over 50 percent of the total building square footage of the project consists of residential use (~~1,316,430~~ 1,230,490 residential square feet ÷ ~~2,281,952~~ 2,094,862 total building square feet) and the project FAR is over 0.75 (~~2,281,952~~ 2,094,862 total building square footage ÷ 441,263 total square footage of project parcels).

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

No Hotel Scenario – Project with No Hotel includes ~~1,522~~ 1,470 housing units (approximately ~~1,460,430~~ 1,368,730 residential square feet) of vary density and product type, ~~778,597~~ 56,122 square feet of commercial uses (neighborhood serving retail and structured parking), and open space areas. The average residential density is ~~150~~ 145 dwelling units per acre. Over 50 percent of the total building square footage of the project consists of residential use (~~1,460,430~~ 1,368,730 residential square feet ÷ ~~2,239,027~~ 1,424,852 total building square feet) and the project FAR is over 0.75 (~~2,239,027~~ 1,424,852 total building square footage ÷ ~~441,263~~ 56,142 total square footage of project parcels).

None of the proposed project changes impact the conclusions provided in our original concurrence letter of June 4, 2014. As stated in that prior letter, the MTP/SCS forecasts a range of very low to high density residential, commercial, office and industrial uses within the Central City Center/Corridor Community area, the community designation applicable to the project. The revised project's land uses fall within this range of general uses. Furthermore, the revised project is still considered a Transit Priority project based on its mix of land uses and proximity to transit.

Thank you for inviting SACOG's input as to the consistency of the Sacramento Commons project with the MTP/SCS for 2035. If you have further questions or need further assistance, please don't hesitate to contact me.

Sincerely,



Mike McKeever
Chief Executive Officer

MM:JH:pm

DETERMINATION OF MTP/SCS CONSISTENCY WORKSHEET
For Qualifying Transit Priority Projects and Residential/Mixed-Use
Residential Projects
As of July 31, 2012ⁱ

Background: Pursuant to SB 375, streamlined CEQA review and analysis is available to Transit Priority Projects (TPPs) and residential or mixed-use residential projects that are consistent with the SCS. The SCS was adopted by the Sacramento Area Council of Governments (SACOG) Board as part of the Metropolitan Transportation Plan/Sustainable Communities Strategy for 2035 on April 19, 2012. The California Air Resources Board issued an Acceptance of GHG Quantification Determination for the SACOG SCS on June 12, 2012.

Streamlined CEQA review available to TPPs consists of one of the following: 1) a Sustainable Communities Environmental Assessment (SCEA) pursuant to Public Resources Code (PRC) § 21155.2(b) or 2) an EIR pursuant to PRC § 21155.2(c).ⁱⁱ

Streamlined CEQA review available to residential or mixed-use residential projects consists of an EIR pursuant to PRC § 21159.28(a).

Purpose: The purpose of this worksheet is to provide lead agencies with assistance on three issues:

1. Whether a proposed project qualifies as a TPP;
2. Whether a proposed project qualifies as a residential or mixed-use residential project (at least 75 percent of the total building square footage is residential);
3. Whether the TPP or residential/mixed-use residential project is consistent with the general land use designation, density, intensity and applicable policies of the MTP/SCS for 2035 adopted by the Sacramento Area Council of Governments (SACOG).

The lead agency has responsibility to make the final determination on these matters and to determine the applicable and appropriate CEQA streamlining, if any.

Directions: This worksheet should be completed by the lead agency, relying on the project description of the proposed project, MTP/SCS Chapters 3 and 4, and MTP/SCS Appendix E-3. Regardless of whether this worksheet is used, pursuant to PRC § 21155(a) and PRC § 21159.28(a), a project can only be consistent with the MTP/SCS if it is consistent with the general land use designation, density, building intensity, and applicable policies specified for the project area in the adopted SCS. This worksheet only applies to the MTP/SCS for 2035 (adopted April 19, 2012); subsequent MTP/SCS adoptions may require updates to this form.

Lead agencies are welcome to contact SACOG for assistance in completing this worksheet. For assistance, contact Kacey Lizon at klizon@sacog.org or 916-340-6265.

DETERMINATION OF MTP/SCS CONSISTENCY WORKSHEET

As of July 31, 2012

Project Title: Sacramento Commons

Proposed project is located in (city/county name): City of Sacramento

1. Transit Priority Project Designation (PRC § 21155(b))

A project must meet the requirements of items 1.A, 1.B, 1.C, and 1.D, below, to qualify as a Transit Priority Project. For items 1.C and 1.D, the definition of an MTP/SCS Transit Priority Area is: the area within one-half mile of a rail station stop or a high-quality transit corridor included in the MTP/SCS. A high-quality transit corridor has fixed route bus service with service intervals of 15 minutes or less during peak commute hours. See MTP/SCS Chapter 3 for the map of Transit Priority Areas.

1.A. The Project has a minimum net densityⁱⁱⁱ of 20 dwelling units per acre.

Calculation:

Option 1 – Project with Hotel

Total housing units proposed in Project 1,374 ÷ Total Project parcel area (in netⁱⁱ acres)
10.13 = 135.6 (Should be ≥20 du/ac)

Option 2 – Project with No Hotel

Total housing units proposed in Project 1,470 ÷ Total Project parcel area (in netⁱⁱ acres)
10.13 = 145.1 (Should be ≥20 du/ac)

1.B. At least 50 percent of the Project's total building square footage is in residential use, AND,

The total building square footage of the Project has 25 percent or less non-residential use, or, if it has between 26 and 50 percent in non-residential use, has a minimum FAR of 0.75.

Calculations:

PARKING FACILITIES INCLUDED IN TOTAL PROJECT BUILDING SQUARE FOOTAGE

Option 1 – Project with Hotel (Including 659,000 sf of Parking)

Total Project residential square footage 1,230,490 ÷ Total Project building square
footage 2,094,862 = 59% (Should be ≥ 50%)

Total Project building square footage 2,094,862 ÷ Total Project parcel(s) area square
footage 441,263 = 4.7 (Should be ≥ 0.75)

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Option 2 – Project with No Hotel (Including 641,750 sf of Parking)

Total Project residential square footage 1,368,730 ÷ Total Project building square footage 2,066,602 = 66% (Should be ≥ 50%)

Total Project building square footage 2,066,602 ÷ Total Project parcel(s) area square footage 441,263 = 4.7 (Should be ≥ 0.75)

PARKING FACILITIES EXCLUDED FROM TOTAL PROJECT BUILDING SQUARE FOOTAGE

Option 1 – Project with Hotel

Total Project residential square footage 1,230,490 ÷ Total Project building square footage 1,435,862 = 86% (Should be ≥ 50%)

Total Project building square footage 1,435,862 ÷ Total Project parcel(s) area square footage 441,263 = 3.3 (Should be ≥ 0.75)

Option 2 – Project with No Hotel

Total Project residential square footage 1,368,730 ÷ Total Project building square footage 1,424,852 = 96% (Should be ≥ 50%)

Total Project building square footage 1,424,852 ÷ Total Project parcel(s) area square footage 441,263 = 3.2 (Should be ≥ 0.75)

- 1.C. [X] The Project is located within an MTP/SCS Transit Priority Area and the qualifying transit service is *(transit route name/applicable street name/number or light rail stop name as identified in the adopted MTP/SCS)*:

Options 1 and 2

The project is located in the Sacramento Transit Priority Area within ½ mile of the 8th & O Light Rail Station, a split light rail station on the Sacramento Regional Transit District's Blue, Gold, and Green Lines. The station is located at the intersection of 8th and O Streets, with the split platforms located on each side of 8th Street where the line splits into one-way couplets. The project is located within a high-quality transit corridor with fixed-route bus service with service intervals no longer than 15 minutes during peak commute hours. Sacramento Regional Transit bus routes within ½ mile of the project include but are not limited to regular routes 2, 6, 15, 34, 38, 51 and 88 as well as peak-only routes 3, 7, 29, and 109.

- 1.D. [X] No more than 25 percent of the area of the Project parcels are farther than one-half mile from the TPA transit stop/corridor and no more than 10 percent of the residential units or 100

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units, whichever is less, in the project are farther than one-half mile from the TPA transit stop/corridor.

Calculations:

Option 1 – Project with Hotel

Project area outside of ½ mile TPA 0% ÷ Total Project area 10.13 acres
= 0% (Should be ≤ 25%)

Project residential units outside of ½ mile TPA 0% ÷ Total Project units 1,374 = 0%
(Should be ≤ 10% or less than 100 units)

Option 2 – Project with no Hotel

Project area outside of ½ mile TPA 0% ÷ Total Project area 10.13 acres
= 0% (Should be ≤ 25%)

Project residential units outside of ½ mile TPA 0% ÷ Total Project units 1,470 = 0%
(Should be ≤ 10% or less than 100 units)

SECTION 1 CONCLUSION:

- [X] The proposed project meets the requirements of 1.A, 1.B, 1.C, and 1.D and therefore qualifies as a Transit Priority Project.
- [] The proposed project does not meet all the requirements of 1.A, 1.B, 1.C, and 1.D and therefore does not qualify as a Transit Priority Project.

2. Residential or Mixed-Use Residential Project Designation for Projects Located Outside of an MTP/SCS TPA 21159.28(a)

A residential or mixed-use residential project using the streamlined CEQA review to complete an EIR pursuant to PRC § 21159.28(a) must meet the following requirement:

- 2.A. [] At least 75 percent of the total building square footage of the project consists of residential use.

Calculation:

Total Project residential square footage ____ ÷ Total Project building square footage ____
= _____ (Should be ≥ 75%)

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SECTION 2 CONCLUSION:

- The proposed project meets the requirements of 2.A and therefore qualifies as a residential or mixed-use residential project.
- The proposed project does not meet the requirements of 2.A and therefore does not qualify as a residential or mixed-use residential project.

IF A PROJECT DOES NOT QUALIFY AS EITHER A TRANSIT PRIORITY PROJECT (UNDER SECTION 1) OR A RESIDENTIAL OR MIXED-USE RESIDENTIAL PROJECT (UNDER SECTION 2), THE PROJECT DOES NOT QUALIFY FOR SB 375 CEQA STREAMLINING. DO NOT PROCEED TO SECTION 3.

3. Required Consistency with the SCS: General Use Designation, Density and Intensity, and Applicable MTP/SCS Policies (PRC § 21155(a) and PRC § 21159.28(a))

3.A. Applicable MTP/SCS Policies. For the purposes of determining SCS consistency, the policies of the MTP/SCS are embedded in the metrics and growth forecast assumptions of the MTP/SCS. Projects consistent with the growth forecast assumptions of the MTP/SCS, as determined by application of items 3.B. and 3.C, are consistent with the MTP/SCS and its policies.

3.B. Applicable Community Type. The MTP/SCS land use forecast is illustrated using Community Types. In order to determine the general use designation, density and intensity of the Project area within the MTP/SCS, the Project must be located within a Community Type designated in the MTP/SCS. The MTP/SCS defines density/building intensity in terms of the amount of growth (residential and non-residential) forecasted and the amount of build out potential within each Community Type area. SACOG monitors development activity on an annual basis to check that the amount of development is consistent with the growth forecast of the MTP/SCS.

For the purposes of the lead agency's determination of SCS consistency, use MTP/SCS Appendix E-3 to identify the Community Type for the Project and fill in the applicable information, below for 3.B.1 and 3.B.2.

3.B.1. The Project is located in the following Community Type:

- Center and Corridor Community
- Established Community
- Developing Community (*list the specific name of the Developing Community as identified in the jurisdiction narrative in Appendix E-3*): _____

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Rural Residential Community

3.B.2 Development from the project when added to other entitled projects will not exceed the MTP/SCS build out assumptions for the area within this Community Type, which is 11,617 new housing units and 14,306 new employees.^{iv}

3.C. General Use Designation, Density and Building Intensity. The foundation of the land use designations for the MTP/SCS is adopted and proposed local general plans, community plans, specific plans and other local policies and regulations. A project is consistent with the MTP/SCS if its uses are identified in the applicable MTP/SCS Community Type and its uses meet the general density and building intensity assumptions for the Community Type. The proposed project does not have to include all allowed uses in the MTP/SCS.

3.C.1. Determine consistency of the Project using one of the methods below:

Option A:

The Project is located in a **Center and Corridor Community or an Established Community** and the Project uses are consistent with the allowed uses of the applicable adopted local land use plan as it existed in 2012 and are at least 80 percent of the allowed density or intensity of the allowed uses. Therefore, the Project is consistent with the MTP/SCS.^v

OR

Option B:

The Project is located in a **Center and Corridor Community or an Established Community** and the Project uses have been reviewed in the context of, and are found to be consistent with, the general land use, density, and intensity information provided for this Community Type in Appendix E-3 of the MTP/SCS. Therefore, the Project is consistent with the MTP/SCS.

OR

Option C:

The Project is located in a **Rural Residential Community** and the Project residential density does not exceed the maximum density of one unit per acre as specified in the MTP/SCS, and employment development in the Project is at least 80 percent of the allowed intensity of the land use designations of the adopted general plan. Therefore, the Project is consistent with the MTP/SCS.

OR

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Option D:

[] The Project is located in a **Developing Community** and the Project's average net density meets or exceed the average net density described for this specific Developing Community (as referenced by name of applicable specific plan, master plan, or special plan in MTP/SCS Appendix E-3) and employment development in the Project is consistent with the general employment land uses described for this specific Developing Community.^{vi} Therefore, the Project is consistent with the MTP/SCS.

SECTION 3 CONCLUSION:

The proposed project is consistent with the General Use Designation, Density and Intensity, and Applicable MTP/SCS Policies for the following reasons (*summarize findings on use designation, density and intensity for the Project evaluation completed in Section 3*):

The project is located in a Center and Corridor Community in the City of Sacramento. Development of the project when added to other entitled projects will not exceed the MTP/SCS build out assumptions for construction of housing units (14,306 units) and creation of new jobs (11,617 jobs) by 2020 in the Center and Corridor Community type in the City of Sacramento. The project's uses, which include residential uses (including live/work units), retail and support uses, and a potential hotel are allowed uses set forth in the City's 2030 General Plan as implemented through the City's Zoning Code as those plans existed in 2012.

Additionally, within the Central City Center and Corridor Community, the MTP/SCS forecasts a range of very low to high density residential, commercial, office and industrial uses (see Appendix E-3, pp. 34-35 for definitions of these uses). Similarly, the City's General Plan contemplates densities between 61.0 dwelling units per acre (du/acre) and maximum density of 450.0 du/acre for residential uses on the project site. The City's Zoning Code further limits maximum density to 175 du/acre. The project's land uses fall within the range of general uses and densities contemplated by the MTP/SCS, the City's General Plan, and the City's Zoning Code.

MTP/SCS policies are embedded in the metrics and growth forecast assumptions of the MTP/SCS. For the purposes of determining SCS consistency, projects consistent with the growth forecast assumptions of the MTP/SCS are consistent with these policies. The revised project is consistent with the growth forecast assumptions of the MTP/SCS and will make a significant contribution towards achieving SACOG's forecast of developing 14,306 units and creating 11,617 new jobs in the City's Center and Corridor Community type by 2020.

For these reasons, the project is consistent with the MTP/SCS pursuant to Option B above.

ⁱ This document may be updated as users provide feedback on its utility.

ⁱⁱ If a TPP complies with an additional series of requirements set forth in PRC § 21155.1, it qualifies as a Sustainable Communities Project and becomes eligible for a complete exemption from CEQA. This worksheet does not address Sustainable Communities Projects.

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ⁱⁱⁱ *Net density* is not defined in PRC §2115(b). In the MTP/SCS, net density is defined as follows: Housing units divided by the acres on which housing is built, exclusive of public rights-of-ways, parks, schools and public areas (MTP/SCS Appendix E-3, pg. 34).

^{iv} The MTP/SCS build out for each Community Type assumes development that is entitled as of January 1, 2008. SACOG monitors housing permits on an annual basis and will ensure that housing and employment projects relying on the SB 375 CEQA benefits will not exceed the capacity assumed in the MTP/SCS.

^v The MTP/SCS general land use, density and intensity in Center and Corridor Communities and Established Communities is based on 80 percent of the allowed density or intensity of the land use designations in adopted general plans as they existed in 2012, unless otherwise noted in Appendix E-3.

^{vi} The MTP/SCS land use forecast in Developing Communities was modeled according to adopted and proposed specific plans, master plans, and special plans as they existed in 2012, and is based on the housing and employment totals and the average net density of these plans, as outlined in Appendix E-3.