

Davidson, John

From: Carrie Jensen [carriejanejensen@gmail.com]
Sent: Sunday, August 14, 2011 9:27 PM
To: Davidson, John
Cc: Oliverio, Pierluigi; Hart, Jared
Subject: Envision 2040 General Plan EIR Comments

Dear Mr. Davidson and City Planning Staff,

First off, I would like to commend you on the Envision 2040 General Plan. This revision makes a dramatic shift toward sustainable land-use policy, and I believe it will create a city that citizens will be proud to call home. I am particularly happy to see the overarching changes in transportation policy that shift from car-centric systems to ones that equally support motorists, pedestrians, cyclists, and public transit. I am also happy about the more stringent riparian setback guidelines and the urban growth boundary. Overall you have developed an ambitious and truly impressive vision for our city; however, I do have a few comments regarding stormwater management.

I am generally concerned that the environmental impacts of stormwater runoff are not being sufficiently mitigated. I understand that the City is required to comply with the NDPEs Municipal Regional Stormwater Permit (MRP), and that the EIR Appendix G, Hydrology and Water Quality Report states that the City's compliance with the provisions of this permit mitigate stormwater impacts. However, I feel that the City could do more to mitigate stormwater runoff and have the following comments and suggested revisions to the plan:

MRP provision C.3.A.I(8) states, "Revise, as necessary, General Plans to integrate water quality and watershed protection with water supply, flood control, habitat protection, groundwater recharge, and other sustainable development principles and policies (e.g., referencing the Bay-Friendly Landscape Guidelines)." Although Appendix G does mention San Jose's Green Building Policies, which include installation of water efficient fixtures and landscaping, minimization of hardscape, and use of drought tolerant native species, the Bay-Friendly Landscape Guidelines are more detailed and include many additional strategies that reduce stormwater pollution impacts, such as integrated pest management. I suggest that the General Plan be revised to include the Bay-Friendly Landscape Guidelines or that the Green Building Policy be revised to include them.

"Greenstreet" stormwater management strategies should be considered for incorporation whenever streets are redeveloped. For examples of these concepts see Portland's website: <http://www.portlandonline.com/bes/index.cfm?c=34598> and San Mateo County Design Guidelines: http://www.flowstobay.org/ms_sustainable_streets.php. I realize that the City may be disinclined to include these in the general plan because of unknown cost factors; however, this is the time to develop the vision for our future. A sustainable city should include a robust plan for incorporating stormwater back into our urban watershed. This is an important part of improving our water quality and reconnecting the urban population with the hydrologic cycle.

I suggest revising Goal MS-3 - Water Conservation and Quality as follows:

- Policy: Promote the use of integrated pest management.
- Action: Update the Green Building Ordinance to include Bay-Friendly Landscaping Guidelines.
- Action: Develop programs to educate the community on stormwater pollution prevention landscaping strategies (i.e. Low Impact Development strategies), such as green roofs, landscape-based treatment measures, pervious hardscape materials, and other stormwater management practices to reduce water pollution.

I suggest revising Goal MS-3 - Water Conservation and Quality as follows:

- Policy: Encourage residents to incorporate Low Impact Development strategies into their landscapes.
- Action: Develop programs that encourage individuals or businesses to complete low impact development retrofits for their properties through community outreach programs and incentives such as tax credits, financing opportunities or other means. (This is similar to Green Building Policy MS-1.9. For examples of

rebate programs, see Palo Alto's Stormwater Rebate Program:
http://www.cityofpaloalto.org/depts/pwd/flood_storm/stormwater_rebates/default.asp).

I suggest revising Goal TR - 9 Tier I Reduction of Vehicle Miles Traveled as follows:

- TR - 1.13: "Reduce vehicle capacity on streets with projected excess capacity by reducing either the number of travel lanes or the roadway width, and use remaining public right-of-way to provide wider sidewalks, bicycle lanes, transit amenities and/or landscaping **integrated with stormwater management systems**. Establish criteria to identify roadways for capacity reduction (i.e. road diets) and conduct engineering studies to determine implementation feasibility and develop implementation strategies.

Once again I commend you on the Envision 2040 General Plan, and I thank you for considering my comments.

Sincerely,
Carrie Jensen