



July 31, 2008

Mr. Tom Pace, Long-Range Planning Manager  
City of Sacramento, Planning Department  
915 I Street, 3rd Floor  
Sacramento, CA 95814

RE: **Comments on City of Sacramento Draft General Plan**

Mr. Pace:

On behalf of the North State Building Industry Association and our nearly 1,000 members in the land development and commercial and residential building industries, I wish to offer the following comments.

We appreciate the City's public outreach on this document and look forward to continue to work with you as we move towards final adoption. In an effort to reduce the number of issues that we would highlight, we offer the following contextual comments.

There are a number of policies within this document that have very broad implications depending upon the interpretation used to implement them. In a number of instances, we feel that a common sense approach to balancing the desire as expressed in the policy and the realities of the individual situations or economic impacts will need to be taken into account. It is our suggestion that the Council direct the DOC to carefully monitor the policies paying special attention to how the different policies are implemented.

Given that the part Four of the General Plan has a policy to review the implementation of the General plan on a yearly basis, we are hopeful that the DOC will be an integral part of this review process.

LU 4.5.3

We appreciate the City moderating the "green" building requirement by using the word encourage. We would respectfully request that the reference to a particular standard (LEED-ND) be removed. As an industry, we are supportive of moving forward with planning and building principles that lessen the impacts on the environment. We share your goal of greater environmental stewardship, but also realize that we need to work

with the City to develop these practices from a local perspective, that takes into account the unique nature of the West and the Sacramento Region in particular.

#### LU 4.5.5

We support the intent of the policy but would respectfully request that the word "require" be replaced with "encourage." We believe that setting length of the block within the General plan reduces the needed flexibility to address unique site issues. It is clear that the City intends to move forward with a traditional grid block pattern and support the implementation with a needed degree of flexibility.

#### LU 4.5.6

We support the intent of the policy, but would respectfully request that the word "require" would be replaced with "encourage." Having a transit stop within one half-mile of every structure without knowing if there are sufficient transit operations revenue to support that level of transit services may result in the infrastructure being in place without the ability to provide the transit service. As an industry, our goal is to develop communities that support true transit choice, but our concern is that an adjustment to the requirement may be needed as development happens.

#### LU 10.1.3

Many of the policy goals of this section are laudable. What we have concerns with are in the following areas:

The language of "shall require" again removes flexibility to adjust based upon the unique aspects of a particular project or annexation. We would suggest that "shall require" be replaced with "shall encourage."

In regards to transportation, placing a requirement that any new project or annexation makes up for past deficiencies in the entire community places an unreasonable burden on new projects.

In regards to infrastructure and community facilities, in trying to understand this section it appears that the draft document will not look at the financing of the infrastructure in its totality. In addition to what may be potentially included as a financial contribution by new development, there also needs to be an acknowledgment that property, sales, TOT and utility taxes are all part of the financial sources to cover this requirement.

#### LU 10.1.5

We would request that this section be modified to allow for Special Study Areas to still move forward.

#### M 3.1.15/16

We are supportive of contributing to transit infrastructure, but have concerns with dedicated bus lanes. In reviewing this policy, we again raise the concern that the ability to fully fund the operations of the transit system will not keep pace with the investment of the infrastructure.

#### M 6.1.4

In pursuing the laudable goal of reducing the land needed for vehicular parking, we would caution the City against the use of structured parking in the General Plan policy. Structured parking is very expensive. We support and encourage the use of shared parking to achieve that laudable goal. We would respectfully request that the reference to structured parking be removed.

#### ERC 2.2.3

This section sets the service level goals for the parks and recreation. We would respectfully request that the City revisit these goals in light of the following comments.

Table ERC 1 lays out a standard of at least 13 acres per thousand for parks and .5 linear miles of parkways, trails/bikeways and linear parks. While the current General Plan of the City has these same standards, we would respectfully submit that there is a strong possibility that this is in violation of the Quimby Act.

While there is an ability for a local jurisdiction to go above the three acre per one thousand limit established in Quimby, it does not allow for the standard to exceed five acres per thousand. The combination of all standards exceeds the five-acre per thousand standard. We would respectfully request that the City amend this section to comply with state law.

This section also seeks to put in place a standard for community and recreations facilities. These standards may or may not be an increase to the level of service that exists today. The City's current General Plan does not go into the level of specificity that the proposed General plan does. It is our belief that the specificity in the proposed General Plan may run counter to current state mitigation fee act requirements.

The standards as outlined in proposed General Plan may be an increase in standards relative to the existing built environment. If the City is proposing to increase the standard, new development can only be held to the standard that exists today, not the increased standard. If the City chooses to go to a different standard, then a different source of funding would need to be identified.

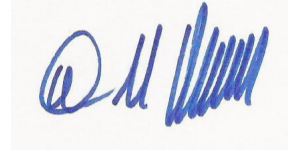
It is our suggestion that Table ERC1 be modified to remove the excess dedication requirements and all of the standards for community and recreation facilities. The standards for community and recreation facilities need to have a degree of flexibility afforded them as acknowledged in your current General Plan last updated in 2004.

"Park standards or Service Level Goals are utilized as a guiding tool to determine appropriate acreage and evaluate the adequacy of service to Community Planning Areas, neighborhoods and the City as a whole. The park Service Level Goals are considered to be goals and not minimum standards. Their application should allow for flexibility as areas change or the needs of residents change..."

We would respectfully suggest that the language of ERC 2.2.3 be modified to include the language from above to create the needed flexibility.

We are grateful for the opportunity to comment and look forward to working with you on adoption of a new General Plan. Please contact me if you have any questions.

Regards,

A handwritten signature in blue ink, appearing to read "Dennis M. Rogers", is displayed on a light gray rectangular background.

Dennis M. Rogers  
Senior Vice President  
Governmental and Public Affairs