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August 20, 2008

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Tom Pace
Long Range Planning Manager
City of Sacramento
915 I St.
New City Hall, Third Floor
Sacramento, CA 95814

Re: Request for Modification to Draft 2030 General Plan

Dear Mr. Pace:

INTRODUCTION

The Florin Perkins Public Disposal Site Material Recovery Facility and Large Volume Transfer Station (Florin-Perkins Transfer Station) is currently permitted by the City of Sacramento, the County of Sacramento, and the State Integrated Waste Management Board. The facility is located east of Florin-Perkins Road and north of Fruitridge Road (see attached map). Recycling and transfer operations will take place on 10 acres, with a 2.5 acre pad for transfer and processing. The 10-acre site is surrounded by a larger parcel which was the location of earlier solid waste handling and disposal activities.

The Florin-Perkins Transfer site is in an area designated for Industrial Use in the current General Plan. It is located within the current Florin-Perkins Industrial Area, the largest such area in the City.

The Draft 2030 General Plan proposes a changed land use designation for the Florin-Perkins site. The new proposed land use designation is Employment Center – Low Rise. Industrial Use designations are retained in areas just south and east of the site.

RECOMMENDATION

The Florin-Perkins site should continue to be located in an Industrial Use designation. The Draft 2030 General Plan land use map and Florin-Broadway maps should be modified to retain the current land use designations for the Florin Recovery Station. Related changes should also be made to the Utilities Section, located in Part 2 of the Draft 2030 General Plan.



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RATIONALE

1. The Florin-Perkins Transfer Station is currently permitted by the City and others.
2. The site has a longstanding history of use for disposal, transfer, and recycling of inert wastes.
3. Operation of the site will enable the City to meet important recycling goals.
4. Operation of the site provides a major asset to the community, enabling the recycling of construction and demolition debris, inert debris and incidental waste.
5. The City's Department of Utilities, Solid Waste Division, has identified the site for potential use as a major green waste composting center (contact: Marty Strauss).
6. The Draft 2030 General Plan designated areas just south and east of the site as Industrial Use. A slight change to maps would include the site.
7. The permitted Transfer Station will operate on a small portion of the overall Florin-Perkins site.
8. A Construction and Demolition (C&D) Transfer/Recycling Center in this area will provide necessary compatible support to proposed development along the Jackson Road corridor to the north (see Goal U.5.1.12).

SPECIFIC REQUESTS

1. Modify the General and Fruitridge-Broadway maps to place the Florin-Perkins Transfer site within the Industrial Use designation.
2. Modify the Utilities (Solid Waste) section of the Draft 2030 General Plan as follows:
 - a) U.5.1.3. Equitably Distributed and Compatible Facilities. To the extent feasible the City shall ensure that new solid waste and recycling facilities are distributed equitably throughout the city, avoiding over-concentration in areas that are well-served, and shall ensure that facility location and design are compatible with surrounding land uses (e.g., by incorporating adequate buffers,



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siting facilities appropriately to maintain the integrity of surrounding development. Expansion of existing facilities should be given preference to development of new facilities. (MPSP)

- b) U.5.1.10. Green Waste/Food Waste Recycling. The City shall develop a green waste/food waste recycling programs. (PSR/SO)
- c) U.5.1.18. Greenhouse Gas (GHG) Reduction Benefits of Recycling. The City shall promote recycling of solid waste as a means to reduce GHG emissions and support the granting of GHG reduction credits to recyclers for use in trading programs.

Thank you for considering these comments. Representatives of the operator and myself would like to meet with you and/or appropriate City staff members to discuss these recommendations. Please contact me at (916) 447-0700.

Very truly yours,

Craig M. Wilson

CMW:ms

Enclosure

cc: Abel Pereira, Zanker Road Resource Management, Ltd.
Lisa Todd, City of Sacramento