

ATTACHMENT 6

September 28, 2008

James P. Pachl
Judith Lamare
500 N Street No. 1403
Sacramento, CA 95814
(w) 446-3978
(h) 444-0910

Jim McDonald, Senior Planner
City Planning Department
915 I Street, Third Floor
Sacramento, CA 95814 email:

fax: 808-7185
jmcdonald@cityofsacramento.org

RE: General Plan Update: why City should retain General Plan designation of
"Residential" for existing residential areas within area of proposed "Central
Business District"

Dear Mr. McDonald,

Thank you for taking the time to talk with Jim last week.

We own a condominium at 500 N Street (Bridgeway Tower), which is part of the residential "superblock" bounded by 5th, 7th, N, and P Streets. This area was acquired by eminent domain, redeveloped and dedicated by City over 30 years ago for high-density residential use, consisting of Bridgeway Tower (condominiums), Pioneer Tower (senior housing), Capitol Tower (apartments) and Capital Villas (recently-upgraded 2-story apartments) totaling 739 residential units, and neighborhood retail. This unique and highly successful residential redevelopment area is known for its extensive tree canopy, and landscaped park-like interior which is open to the public. The ground floor retail in Capitol Tower and park-like grounds are used by numerous workers from nearby offices, particularly during the noon hour.

Continued residential use is protected by the current General Plan, which designates the area as "High-Density Residential" and The Central City Community Plan, which designates it as "Multi-Family Residential."

However, the proposed General Plan Update proposes to abolish all existing General Plan Residential designations north of Q Street and west of 15th Street (except for a small area north of downtown), and instead cover all properties in that areas with a very general "Central Business District" designation. This is a radical change which would allow demolition of existing residences and replacement with office/commercial/retail development on any property in the "Central Business District" area, without a General Plan or Community Plan amendment. The Community Plan would be abolished. Long-established residential neighborhoods would be protected only by existing zoning, which can be readily changed.

Specifically, the proposed “Central Business District” designation would authorize either single or mixed use office, retail, or multi-family residential on any parcel. A developer in the CBD who wanted to demolish existing housing and build an office or hotel would need only obtain a change of zoning from City. Experience has shown that in most instances, the City is strongly inclined to approve zoning changes which are consistent with the General Plan.

The City’s abandonment of Residential general plan designations of residential neighborhoods in favor of the proposed “Central Business District” would communicate to commercial-use developers and the public that the City is now willing to replace residential neighborhoods with office and other non-residential development north of Q Street, marking a significant departure from long-established City policy. The General Plan Update says that City wants to increase downtown housing, but if the City were truly serious about downtown housing, the General Plan update would retain at minimum the existing Residential general designations for existing residential neighborhoods.

In addition to the Pioneer, Capitol, and Bridgeway Towers and Capital Villas “superblock”, there are a number of highly successful and long-established multi-family residential neighborhoods north of Q Street, such as Governors Square, that would be affected by the proposed removal of Residential designation. These neighborhoods have succeeded for decades because of quality of life features which would be threatened by rezoning portions of them to office, hotel and non-neighborhood commercial development which is incompatible with neighboring residential use. None of these neighborhoods would qualify as urban decay deserving of urban redevelopment.

Already the City is processing an application (“Capital Villas”) that would replace existing upgraded 2-story apartments with three 35-story office or hotel towers and parking structures between N, P, 7th, and former 6th Street.¹ The City used its power of eminent domain to develop the Capitol Tower/Bridgeway Tower/Pioneer Tower/Capitol Villas superblock specifically to provide housing in the downtown area, and has subsequently rejected more than one proposal for office towers in that area. To now allow the majority of that exclusively residential four block area to be redesignated, demolished, and rebuilt with office and commercial uses would be renegeing on the City’s commitment made to the public when this area was redeveloped. If that area were re-designated as “Central Business District” in the new General Plan, the developer would need only to obtain a change of zoning for a very drastic change of use.

New development in the proposed CBD is expanding exponentially with Richards Blvd Development, the Railyards and the Riverfront. It would be inconsistent with the focus on these new growth areas to permit piecemeal changes in the existing residential neighborhoods north of Q Street. It would allow uses that will compete with rather than complement the development

¹ The latest version of the Capitol Villas proposal calls for demolishing the 204-unit Capitol Villas apartments (2-story) and most of the trees and lawn within the 4-block superblock, subdividing into four parcels, erecting two 25-story apartment towers and three 35-story towers which can be office, hotel, or residential, as decided by the developer prior to construction, and erecting multi-story parking lots on most of the remainder. It is not unlikely that the developer would opt for three office towers, instead of residential, because of the potential for competition and overbuilding posed by the half-dozen or more other large multi-family downtown residential projects which have been approved but not yet built. Capitol, Pioneer and Bridgeway Towers would remain but most of the trees, lawn, and landscaping for which the area is noted would be eliminated.

planned for the new growth areas in the CBD while disrupting residential values and creating incompatible uses in the current successful residential neighborhoods.

The Capitol Villas proposal includes substantial new street-level retail. We are concerned about any new sizable retail development south of N Street (except for small neighborhood stores) that would compete with the healthy recovery of Downtown Plaza as the major shopping and entertainment center in our neighborhood. We have watched Downtown Plaza deteriorate as the City has approved new commercial uses in the downtown area, and we see the potential for further deterioration of Downtown Plaza in the redesignation of our residential neighborhoods for "multi-use" areas, even while there are existing storefronts south of N Street which are empty.

We also note that the Capitol Area Plan was developed to provide for mixed uses in part of this area while planning for growth in state office uses. It assumes that the residential uses designated in it, and those west of the Plan area, will remain residential in a tapestry of mixed use. The General Plan Update designation of this area as Central Business District on its face appears to contradict the Capitol Area Plan. How has the City included the Capitol Area Plan in its general plan update for the Central City?

If the City seriously wants to increase housing north of Q Street and west of 15th Street, it will retain Residential designations in its General Plan for residential uses in that area, and allow conversion to non-residential use only by case-by-case amendment of the General and Community Plans only if there is showing of very strong need, as is presently required. Replacement of Residential designation with the much more permissive CBD designation would only encourage replacement of residential with office/commercial development whenever the market is more favorable for downtown office/commercial development.

Please consider seriously the effect of this GP Update designation for this area on downtown residents and residential property owners. It is common sense that if City wants to substantially increase housing in the affected area, it at minimum must retain Residential designation for residential areas in its General and Community Plans. We urge you to retain the Residential designations for this area as you have in other areas of the Central City.

Very Truly Yours,

James P. Pachi

Judith L. Lamare

Neighbors of Capitol Villas

915 L Street, C-262, Sacramento, CA 95814

October 1, 2008

Planning Commission, City of Sacramento
915 I Street, Third Floor
Sacramento, CA 95814

RE: Proposed new City General Plan

We represent residents of the 4-block residential neighborhood bounded by 5th, 7th, N and P Streets, housing approximately 739 residential units.

- Currently this is the region's highest density large-scale downtown housing area;
- This Redevelopment area is comprised of senior, affordable, high rise, and two-story garden apartments and high-rise condominiums;
- We enjoy downtown residential density PLUS green space: more than 100 trees, grassy lawns, benches, a fountain and pool with wide public access sidewalks, without vehicular traffic, on about 10 acres of land. The park-like grounds are heavily used by the public, particularly at noon hour.
- Our neighborhood, we believe, exemplifies the BEST of the Guidelines you are aiming for with your new General Plan. It is a proven and highly successful model for livable downtown housing.

We urge you to keep the current RESIDENTIAL DESIGNATIONS in the new Central Business District.

We believe ours, and all of the other current residential areas in the new "Central Business District" designation need to:

- Retain a Residential designation on the new City General Plan; AND
- Be set aside EXCLUSIVELY for residential living.

We would like our neighborhood to:

- Maintain the current amount of green space, trees, fountains, park-like setting and public access it currently enjoys.

We cordially invite Commissioners to visit and enjoy a walk through this area.



Jeanie Wilcox, Chair and Neighbors of Capitol Villas¹

doctorswilcox@gmail.com

916-448-1861

¹ Neighbors of Capital Villas was formed to address concerns about the proposed "Capital Villas" project, which seeks to subdivide and demolish the 2 story apartments and most trees and lawn, and build 5 high-rises and parking structures, including three 35-story office and/or hotel towers.



Dear Members,

Capitol Landing Partners, LLC is requesting the 2030 General Plan be changed to better reflect the intent of the Railyard Master Plan with regards to the 7th Street Corridor. We request the western half of the block between E and F and 7th and 8th Streets to be designated as “Urban Corridor High” and the block between D and E and 7th and 8th street to be designated as “Urban Corridor Low”.

As owners of the two parcels of land at 717 & 719 F Street, we support the idea of a transition from the “Urban Center High” designation in the Railyards project on the west side of 7th street to the “Traditional Neighborhood Medium Density” designation in the Alkali neighborhood east of 8th Street.

We believe that 7th street connecting to the exciting revitalization projects in the Richards blvd area is an Urban Corridor worthy of an appropriate land use designation. Previous versions of the Railyard Master plan and the Alkali Edge Development Regulations specifically called for a transition from 7th to 8th street with heights going from 105’ along 7th down to 35’ feet along 8th street and densities of 75 to 150 units per acre along 7th street down to a density of 15 to 30 units per acre along 8th street. With those regulations anticipated, the mixed-use retail, office and residential Stanford Lofts project was entitled along 8th street between E and F. That project supports the idea of a transition zone as it steps up in height from 35’ along 8th street to nearly 60’ as it moves towards 7th street.

Restricting the remaining parcels in this area to the proposed designation “Traditional Neighborhood Medium” would prevent the important transition zone that had the support from the community, city staff and Railyard developers. It would also prevent the LPA designed Capitol Landing project on our parcels that was met with support and positive reviews.

I am happy to meet with any interested party to better explain this request.

Bryan DeBlonk
Managing Partner
Capitol Landing Partners, LLC

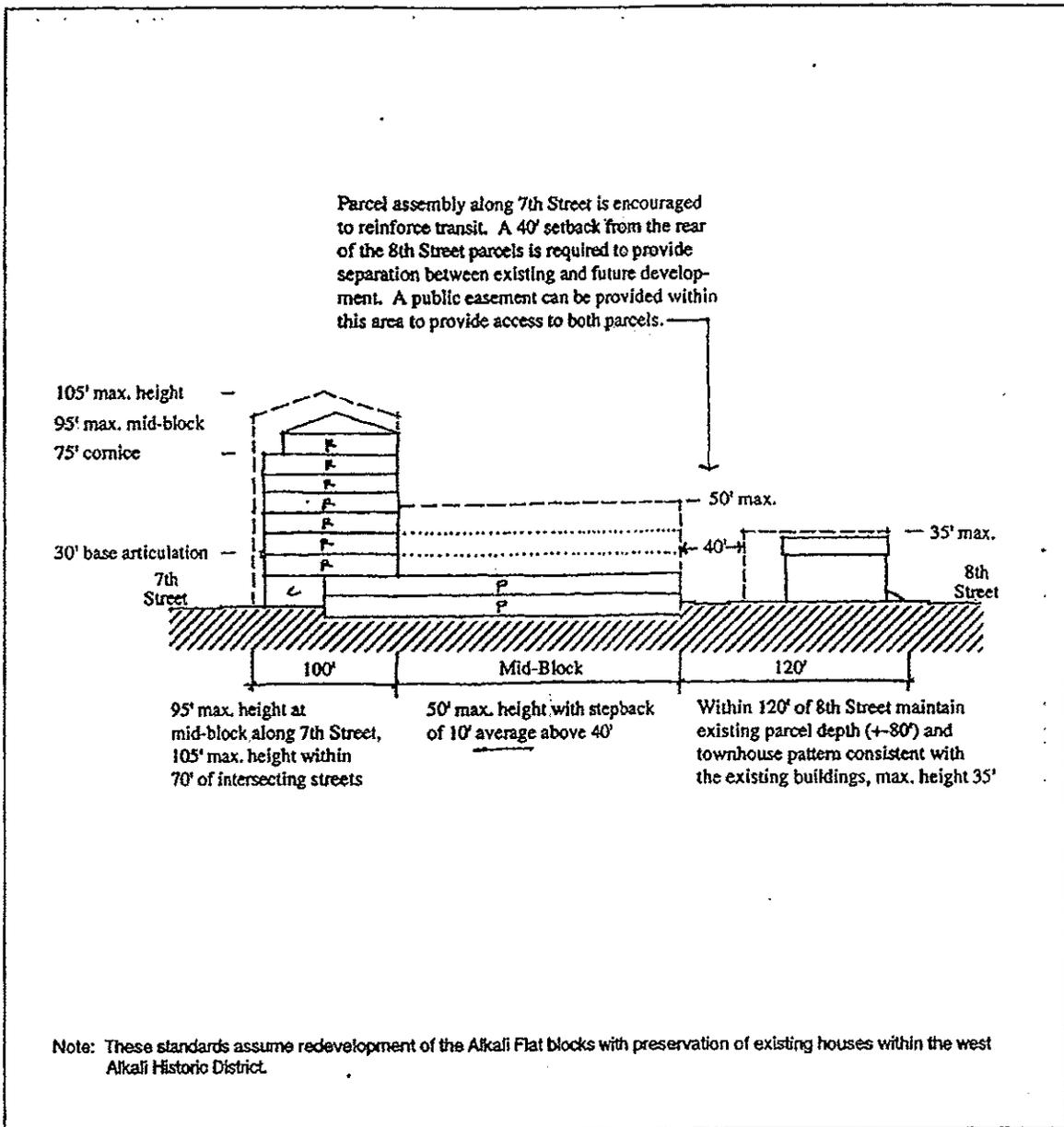


Figure 8-12

Residential Mixed Use District
Alkali Edge Development Regulations

10 AM WED

**Exhibit 6
HEIGHT AND MASSING REQUIREMENTS
FOR THE RMX ZONE**

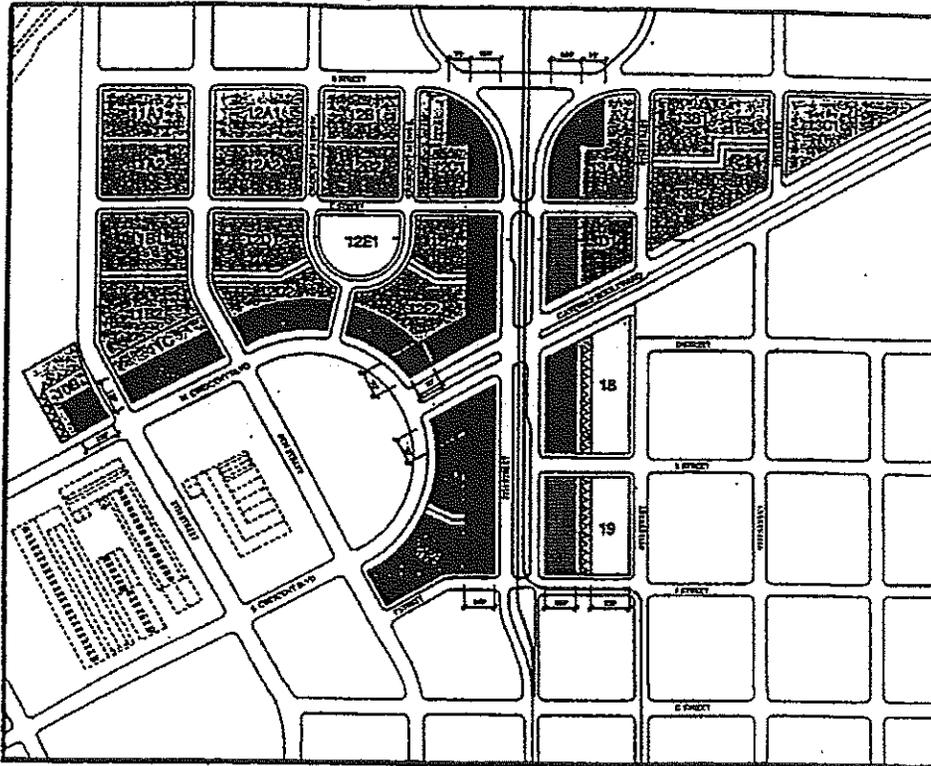


Figure 4-6

**Residential Mixed Use District
Height Limits**

	MINIMUM HEIGHT	MAXIMUM HEIGHT
Landmark Towers	160'	250'
7th Street Corridor	75'	105'
Crescent Boulevard	65'	85'
Medium Density Residential	N/A	50'
8th Street	N/A	35'
Common Space	N/A	25'
Height and Bulk Transition Requirements		

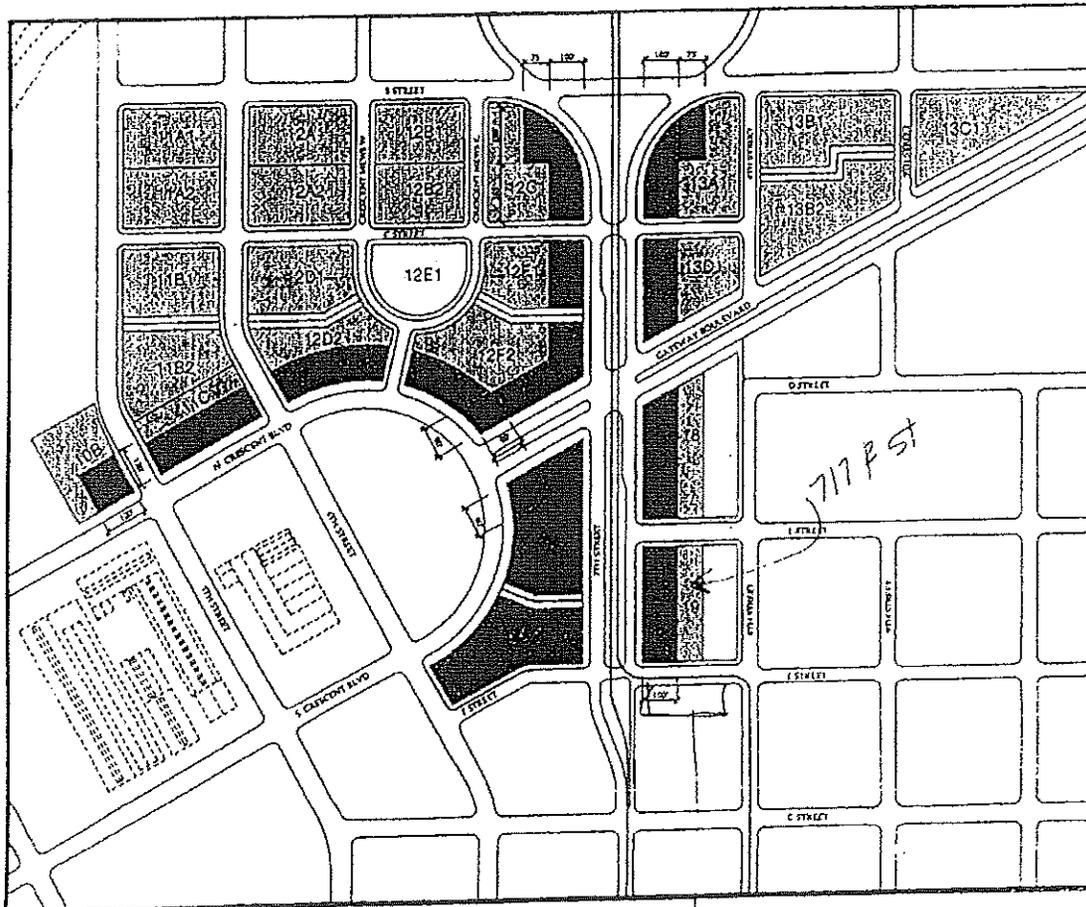


Figure 4-8

Residential Mixed Use District Distribution of Density / Building Types

	UNITS PER ACRE	
	MINIMUM	MAXIMUM
 Towers	75	150
 Mid-Rise Streetwall	75	150
 Low-Rise Streetwall / Courtyard	45	90
 Townhouse / Stacked Flats	15	30

Note. This map is illustrative, describing the range of building types that could be produced within the program parameters described in this plan.



980 Ninth Street, Suite 1900
Sacramento, California 95814
main 916.447.0700
fax 916.447.4781
www.stoel.com

August 20, 2008

CRAIG M. WILSON
Direct (916) 319-4748
cmwilson@stoel.com

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.



Tom Pace
August 20, 2008
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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



POWER INN ALLIANCE

Sponsors

A. Telchert & Son, Inc.
City of Sacramento
Depot Park
Granite Park Partners
Panattoni Development
Stonebridge Properties
World of Good Tastes

Mr. Tom Pace
Director, Long Range Planning
City of Sacramento
915 "I" St.
New City Hall, 3rd Flr.
Sacramento, CA 95814

September 8, 2008

Friends

A&A Concrete Supply, Inc.
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Buzz Oates Companies
California State University
County of Sacramento
Golden 1 Credit Union
Jackson Properties
L and D Landfill
Lawnman, Inc.
Sacramento Recycling
Team Power Forklifts
Waste Management

Re: Zanker request to Modify General Plan

Dear Mr. Pace,

It has come to our attention that the owners and/or operators of the Florin-Perkins Public Disposal Site, through their attorneys Stoel Rives, LLP, have requested the Sacramento Long Range Planning Department to significantly modify the City's current draft 2030 General Plan. We trust this request will be met with the skepticism and rejection it deserves.

As you know, the Power Inn Alliance has long been involved in development of the 2030 General Plan. We have held briefings, attended conferences and made many contributions that have been incorporated into the current draft. Most recently, we have been working closely with Alan Porter on the "65th St. University Village Opportunity Area" which impacts the Florin-Perkins site.

We believe the current plan is a good one and meets the needs of the City and this area for the future. We do not believe it needs to be modified, nor should it be modified, in the manner requested because doing so would undermine a number of important City policies. For example, the owner/operator's "specific request" number 2(a), to modify the Utilities (Solid Waste) section of the draft 2030 General Plan to state merely that, "to the extent feasible" the City shall ensure that "new" solid waste and recycling facilities are distributed equitably throughout the City is a blatant attempt to circumvent the policies of the City's Solid Waste Restricted (SWR) Overlay Zone.

Likewise, the owner/operator's "specific request" that "Expansion of existing facilities should be given preference to development of new facilities" would further countermand the policies behind the SWR Overlay Zone, which were formulated through extensive efforts by council members from this area going back to Senator Darrell Steinberg.

"Specific request" number 2(b), suggesting that "green waste" be incorporated into the city's Food Waste Recycling program, is an unveiled threat that this site intends soon enough to become a green waste composting facility with all the attendant odiferous and noxious air impacts. Imagine how pleasant that will be to the new home owners anticipated along the Jackson Highway corridor on a hot day when a southwest wind is blowing.

Notably, in support of this request, the owner/operator represents in its "rationale" that 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)."

Directors Emeritus
Dain Domich
Senator Darrell Steinberg
Trong Nguyen

Executive Director
Jerry Vorpahl

We confirmed in a personal conversation with Marty Straus that the Florin-Perkins owner/operator's representation is false. Mr. Strauss stated that this site has never been so identified; the City has had only one meeting with the operator, has had no negotiations and made no agreements. Mr. Strauss stated that "while we need major composting sites, Florin-Perkins HAS NOT been identified as one."

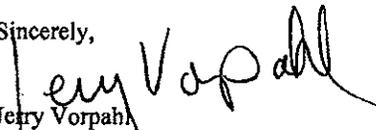
"Specific request" number 2(c) attempts to isolate the benefits of solid waste recycling as a means to reduce greenhouse gas emissions and ignores the cumulative detrimental effects of the Florin-Perkins owner/operator's proposed General Plan modifications. The City's long-range vision for the area, including the currently proposed land use designations, supports the City's smart growth and sustainability policies. These policies would be substantially undermined by the Florin-Perkins owner/operator's requested modifications, which ignore the relationship of appropriate siting of solid waste recycling and transfer facilities to cumulative noise, air, water quality, traffic and other impacts. The increase in vehicle miles traveled ("VMT") caused by limited disposal options and an over-concentration of facilities in one area of the City has direct adverse effects on the environment.

Similarly, the Florin-Perkins owner/operator's requested modifications substantially interfere with the City's land use policies, particularly those designed to achieve more sustainable jobs/housing patterns. Research has shown that co-location of jobs and housing is one of the best ways to reduce VMT. Nothing in the rationale for the requested modifications supports the notion that the benefits of recycling at this particular site outweigh the harm it would do to the City's vision for this community and for the City as a whole.

To advance and promote the City's policies concerning smart growth and sustainability, zoning of the Florin-Perkins site *should not* continue to be "Industrial Use," and the currently proposed General Plan designation of the area as an "Employment Center – Low Rise Industrial Use" should stand. This not only meets the needs of future housing development along the corridor, but has the full approval of the Power Inn Alliance, the College Glen Neighborhood Association and local developers who have invested heavily in the area.

If anything, the Long Range Planning Department, Department of Utilities, Solid Waste Division and City Council should incorporate restrictions and conditions into the General Plan that will protect the existing SWR Overlay Zone and promote the most effective land use policies in this area. Clearly, the continued use of the Florin-Perkins site as a Public Disposal Site and Transfer Station is not compatible with such use, and this attempt to modify the 2030 General Plan should be rejected out of hand.

Sincerely,



Jerry Vorpahl
Executive Director

cc: Alliance Board of Directors
Mayor Heather Fargo
Councilman Kevin McCarty
Bob Tokunada
Tom Buford
Edison Hicks
Marty Strauss
Dennis Green
Lisa Todd
Andrea Matarazzo
Osha Meserve
Jim Wiley

College/Glen Neighborhood Association

September 14, 2008

To : Tom Pace
Long Range Planning Manager
City of Sacramento
915 I Street
New City Hall Third Floor
Sacramento, CA 95814

From: Annette Deglow, President
College-Glen Neighborhood Association
8424 Olivet Court • Sacramento, CA 95826
Home: 383-6621 • Fax: 383-9196 • Cell: 806-3138

Reference: Letter to Pace from Wilson at Stoel Rives LLP dated August 20, 2008 requesting changes to the draft 2030 General Plan.

The College Glen Neighborhood Association, on behalf of the 3000 households in the College Greens and Glenbrook neighborhoods, takes strong exception to the rationale presented in the subject letter and requests that you reject the recommendation and specific requests presented.

We believe the requested changes to the draft General Plan are inconsistent with the vision developed by community representatives at the numerous workshops held in this area and throughout the city during the past three years. The requests, in our opinion, are self-serving and are not in the best interests of those who live or work in the area adjacent to the Florin Perkins Landfill or the City of Sacramento at large.

We strongly support the zoning changes to Employment Center-Low Rise, which reflects recent development in the area as well as proposed development along the Highway 16 Jackson Road corridor.

We do not support the additional verbiage to the first sentence in section U.5.1.3. *To the extent feasible* which in our opinion, are weasel words that only weaken the intent of the paragraph. We strongly object to the added sentence *Expansion of existing facilities should be given preference to development of new facilities*. This sentence is totally contrary to the intent of the paragraph. It will create a cartel of current operators, limit competition, and result in higher prices for services.

The proposed additions to U.5.1.10 and proposed addition of U.1.18 are an apparent attempt to provide the means for processing green waste at the Florin Perkins facility.

The College-Glen Neighborhood Association strongly opposes any green waste processing at the Florin Perkins facility. The College Greens and Glenbrook Neighborhoods are already adversely impacted by the odors from the green waste processing facility on Ramona Avenue which is three times as far from our neighborhoods as the Florin Perkins site. The City does not need a green waste facility at Florin Perkins and our neighborhood is adamantly opposed to more processing of green waste in our area.

College/Glen Neighborhood Association

Tom Pace
September 14, 2008
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We believe the rationale offered for the changes is seriously flawed.

1. The permit for the Florin Perkins Transfer Station has been challenged by the College Glen Neighborhood Association and the Power Inn Alliance which represents businesses in the Power Inn corridor, and Council District 6. The matter is under litigation.
2. The site has a long history of questionable operations, code violations, and fires. It is not in our opinion, an asset to the community.
3. We are not aware of any documentation to support a claim that the city is not meeting its recycling goals.
4. We are not aware of any documentation to support a claim that additional facilities are needed to accommodate the solid waste imports to District 6.
5. The City's Department of Utilities, Solid Waste Division, has acknowledged that there is an over concentration of solid waste facilities in District 6 and that the over concentration is exacerbating the adverse environmental impacts on the community and causing an additional expense for the processing of the city's solid waste. The City needs to reduce the percents of solid waste processing in our area not increase the current volume.
6. The referenced "slight change" is not a "slight change" and it would have a adverse impact on the community. It would not improve the quality of life in our area or contribute to the Mayor's goal of making Sacramento the most livable city in America.
7. We are not aware of any documentation to support a claim that the existing facilities will be unable to handle the future solid waste needs of the City including those resulting from development along the Jackson Highway corridor.

Thank you for considering our concerns. If you wish further information, please contact me at (916) 383-6621.

fc/ec:	Mayor Heather Fargo	264-7680
	Councilmember McCarty	264-7680
	Jerry Vorpal,	453-8880
	Osha Meserve	244-7300

Neighborhood Land Use and Transportation Collaborative

Sacramento General Plan Issues and Concerns

We the undersigned Neighborhood Associations agree that “Complete Streets” is a good and laudable concept. However, streets are not complete without consideration of all the factors bearing on livability of neighborhoods those streets pass through. The following are some of the specific issues of concern and we ask the City to address them before approving the 2030 General Plan.

- The City’s Traffic Impact Analysis Guidelines¹ only address the impact of increased traffic from new development on motorists, e.g., street segment and intersection level of service. The City should, like other progressive cities (Portland, San Mateo), also address the impact of increased traffic on degrading the livability of existing residential neighborhoods. The City lacks a mechanism to gauge the impact of traffic on our neighborhoods, thus the City should develop methods to balance livability, transit and moving people rather than focusing mostly on the automobile.

- The current Draft General Plan assumes that per capita vehicle miles travelled will be reduced due to smart growth and improved transit.² This assumption is only valid if adequate and secure transit funding has been allocated. The General Plan should lay out the effects of ongoing cuts in transit funding on vehicle miles traveled. The General Plan should contain an advocacy plan to obtain adequate transit funds to mitigate increased development. There needs to be a clear commitment to restoration of transit funding cuts and expanded transit funding.

¹ Traffic Impact Analysis Guidelines, City of Sacramento, 1996. Section G. Off-site Roadways.

² Draft Master Environmental Impact Report, Page 6.12-59. *The daily vehicle miles traveled (VMT) per capita in the City of Sacramento decreases by 13.2 percent with the 2030 General Plan.*

- Traffic studies conducted and prepared for new development are often incomprehensible. Traffic Studies should be clearly understandable, timely, and complete, so that there can be active neighborhood participation. All of the assumptions that are entered into traffic study models, e.g., in the calculation of daily and peak hour trip generation estimates and the SACMET 2027 travel demand model, should be listed and explained. When models are used there should be a basic explanation of how the model works.

We the undersigned Neighborhood Associations request that the Planning Commission and/or the City Council direct staff to work with the Neighborhood Associations, joined together as the Neighborhood Land Use and Transportation Collaborative, to address the above General Plan issues and concerns prior to adoption of the General Plan.

REMY, THOMAS, MOOSE and MANLEY, LLP
ATTORNEYS AT LAW

MICHAEL H. REMY
1944 - 2003

TINA A. THOMAS
OF COUNSEL

JAMES G. MOOSE
WHITMAN F. MANLEY
ANDREA K. LEISY
TIFFANY K. WRIGHT
SABRINA V. TELLER
ASHLE T. CROCKER

455 CAPITOL MALL, SUITE 210
SACRAMENTO, CALIFORNIA 95814

Telephone: (916) 443-2745
Facsimile: (916) 443-9017
E-mail: info@rtmmlaw.com
<http://www.rtmmlaw.com>

JENNIFER S. HOLMAN
MICHELE A. TONG
AMY R. HIGUERA
HOWARD F. WILKINS III
AMANDA R. BERLIN
JASON W. HOLDER
LAURA M. HARRIS
KATHRYN C. COTTER
CHRISTOPHER J. BUTCHER

BRIAN J. PLANT
OF COUNSEL

October 23, 2008

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

Dear Mr. Pace:

We are writing on behalf of our client, Alleghany Properties LLC, the developer of the Natomas Crossing Planned Unit Development, to request the 2030 General Plan land use and urban design designation for the proposed 108.6 acre Natomas Crossing site (Quads B, C, and D of Area 3 of the Natomas Crossing PUD (see attached)) be changed to Planned Development.

The Natomas Crossing project has been in the in the development review process since March 2004, and more recently updated in June, 2006. We believe the Planned Development designation would provide the degree of flexibility needed to allow the City to go forward with its General Plan while the City and Alleghany Properties continue to work through the details of the Natomas Crossing project. The Planned Development Designation would ensure that any development of the project site is consistent with the 2030 General Plan's Vision and Guiding Principles, while allowing the City and the applicant time to determine which 2030 General Plan land use and urban design designation(s) are most appropriate for the project area, which are currently proposed to include: 600,000 SF of Hospital; 600,000 SF of Medical Office; 455,000 SF of Office; 769,000 SF of Regional Retail; 130,000 SF of Hotel; 470 units of residential housing; and 1.5 acre urban park.

In addition, the requested Planned Development designation appears to be consistent with the Draft North Natomas Community Plan, which identifies the Natomas Crossing project site as an "opportunity area" for which information remains to be