

To: City of Sacramento Long Range and Preservation Planning staff

From: Jon Marshack, Preservation Chair, Boulevard Park Neighborhood Association

Re: 2040 General Plan Update: Comments on December 15, 2020 Meeting on Draft Land Use and Floor Area Ratio (FAR) Maps

Thank you for providing the opportunity meet with you on December 15 to discuss proposed land use and FAR maps and their potential impacts on Sacramento's historic resources. You presented information regarding a number of changes that you have made to lessen those impacts and I am grateful for your willingness to address preservation community issues. I understand from our meeting that in January, the City Council will be asked to endorse the proposed Land Use and FAR "framework," but that parcel-specific changes can still be made up to adoption of the 2040 General Plan at the end of 2021.

Below are my comments based on the information that you shared with us and the two maps sent later in the day via email.

- 1) I realize that in addition to the General Plan, development on historic parcels is limited by zoning, the Planning and Development Code, the Secretary of the Interior's Standards, and the Historic District Plans. However, when General Plan land uses and FARs are inconsistent with what is permissible under those other documents, developers are given unrealistic expectations and are encouraged to push back against the more specific and more restrictive limitations. As a result, developers expect more flexible interpretations and are more apt to apply for deviations, which circumvent the standards and guidelines. Some current property owners will view the inconsistencies as justification to cease maintaining their historic properties, allowing them to fall into the cycle of demolition-by-neglect with the hope of more profitable future development projects once the historic resource has deteriorated past the ability to be rehabilitated. Wouldn't our irreplaceable historic resources be better protected by reducing or eliminating the inconsistencies in the first place?
- 2) The focus so far has been on historic districts. Similar concerns exist with individually listed Landmarks that are outside of Historic Districts, where the Historic District Plans are not applicable. Please take the time to survey those resources to ensure that proposed land uses and FAR designations are sufficiently consistent with existing uses, such that development pressures will not place those resources at risk.
- 3) Land uses that favor retention of existing housing and creation of new housing would be consistent with Sacramento's need to address the current housing shortage, especially the shortage of affordable housing. Older housing stock will nearly always be more affordable than newly constructed housing; so, preservation of existing housing stock should be a high priority. Designating existing housing parcels as Residential Mixed Use (RMU) would

encourage displacing units of housing with office, commercial, or service-related commercial uses. The city should be encouraging historic structures that were originally built as housing but later converted into office or other uses to be converted back into housing; RMU land use designation works in the opposite direction.

- 4) Once the 2040 General Plan has been adopted, I understand that zoning of parcels will need to be adjusted to be consistent with the new land uses and FAR designations. Current zoning includes transitional height limitations between higher-density urban corridor uses and R-1 or R-3 residential uses. Transitional height limitations between “Neighborhood” and RMU and between disparate FAR designations similarly will be needed.
- 5) Below are specific parcel designation issues in the area served by the Boulevard Park Neighborhood Association, based on Land Use and FAR maps dated 12/15/2020:
 - a) Grant Park, bounded by B, C, 21st, and 22nd Streets, is one of the original “Public Squares” designated in the Official Map of the City of Sacramento adopted by resolution of December 4, 1854. But it is shown as “Neighborhood” with a FAR of 2.0 on the recent 2040 General Plan Update land use maps. This park, a character defining feature of both the National Register and the City of Sacramento’s Boulevard Park Historic Districts, should be designated “Parks and Recreation” with “No FAR” so that the park use is retained.
 - b) Within the Boulevard Park Historic Districts, parcels between Blues Alley and C Street are shown with an FAR of 4.0, which is inconsistent with existing one-story single-family homes, several of which are contributors to the districts.
 - i) 222 21st Street
 - ii) 226 21st Street
 - iii) 230 21st Street
 - iv) 2015 C Street
 - v) 2019 C Street
 - vi) 2205 C Street
 - vii) 2215 C Street
 - viii) 217 22nd Street, Landmark
 - ix) 225 22nd StreetI recommend a FAR of 2.0 to lessen inappropriate development pressure on these parcels.
 - c) 2301 F Street is an individually listed single-story Landmark former gas station, which is inconsistent with the FAR of 4.0. Recommend a FAR of 1.0 or at most 2.0.

- d) 2001 I Street is a two-story Landmark Italianate residential structure, now used as office, which is inconsistent with the FAR of 6.0. Recommend a FAR of 2.0.
- e) 2011 I Street is a recently rehabilitated 2-story Landmark Queen Anne residential structure which is inconsistent with the FAR of 6.0. Recommend a FAR of 2.0.
- f) 2100 I Street is a three-story Landmark Neoclassic multi-family residential structure which is inconsistent with the RMU land use and a FAR of 6.0. Recommend "Neighborhood" land use and a FAR of 3.0.
- g) 2030 H Street contains two structures, a two-story residential over commercial structure at the corner of H and 21st Streets and the brick one-story Weatherstone Coffee at 812 21st Street. The parcel is designated as a Landmark. Both structures are inconsistent with the FAR of 6.0. Recommend a FAR of 2.0.
- h) Three parcels within the New Washington School Historic District are shown with a FAR of 6.0.
 - i) 517 19th Street
 - ii) 1911 F Street
 - iii) 1912 F Street

A FAR of 6.0 is in conflict with height limitations in the Historic District Plans, as these parcels are immediately adjacent to single- and two-story residential contributors, one of which is a Landmark. A FAR of 2.0 would be more appropriate.
- i) 1827 H St is a two-story Landmark Italianate residence designated RMU. "Neighborhood" would be more appropriate to preserving this historic structure.
- j) The Union Pacific Railroad right of way between 19th and 20th Streets should be designated as Open Space with "No FAR," as construction on these parcels is impractical.