



November 11, 2020

Members of the Planning and Design Commission
City of Sacramento

PLANNING AND DESIGN COMMISSION MEETING OF NOVEMBER 12, 2020,
AGENDA ITEM 9: 2040 GENERAL PLAN UPDATE - DRAFT LAND USE MAP

The draft Land Use Map that you will discuss this Thursday would establish land use categories for properties throughout the City of Sacramento, including for Contributing Resources within our Historic Districts and for Landmarks. For some historic properties, the proposed land use categories are inconsistent with existing uses, encouraging inappropriate future uses of historic structures. Changes in land use often lead to physical changes in those historic structures, which can result in the loss of character-defining features, thereby jeopardizing historic integrity. Retention of existing use is the best way to preserve historic character.

The foundation of Sacramento's preservation program is the Secretary of the Interior's Standards for Treatment of Historic Properties, especially the Standards for Rehabilitation. Rehabilitation Standard #1 states, "A property will be used as it was historically or be given a new use that requires minimal change to its distinctive materials, features, spaces and spatial relationships."

Less than one year ago, the city concluded a multi-year, multi-stakeholder effort culminating updates to the Sacramento Register of Historic and Cultural Resources and adoption of the *Historic District Plans*. These products were intended to strengthen Historic District integrity through the documentation of Contributing Structures, character-defining features, periods of significance, and statements of historic context, and to guide future development within our Historic Districts. This project has won both state and national awards in historic preservation. Future changes to Sacramento's General Plan should recognize this substantial effort and not jeopardize its success through adoption of inappropriate land uses.

The Boulevard Park Neighborhood Association urges you to modify the draft Land Use Map so that proposed land uses are consistent with existing uses for all parcels within Historic Districts that contain Contributing Resources and for individually listed Landmark parcels.

By way of example, let us look at land use within the block from 21st to ~~21st~~ 22nd Street and G to H Street within the city's Boulevard Park Historic District and the historic district of the same

name on the National Register of Historic Places. This block contains some of the most stately two-story historic homes within these districts, including the Aden Hart Mansion, the only structure listed as “Essential” on the city’s original Boulevard Park survey. All of the historic properties on this block are used exclusively as single- and multi-family residences. At its center, this block also contains one of the three “pocket parks” that were key components of the original Boulevard Park development plan and are character-defining features in these Historic Districts. The existing pattern of uses within this block is consistent with the proposed “Neighborhood” land use designation.

In contrast, the draft Land Use Map proposes to designate land use for this entire block as “Residential Mixed Use.” In addition to residential, this proposed use designation would encourage “retail, employment, entertainment, cultural, and personal service uses, such as restaurants, apparel stores, specialty shops, theaters, bookstores, hotels and motels, research and development, and other similar uses serving a community-wide market, as well as banks, financial institutions, childcare centers, medical and professional offices, and other general offices and community institutional uses” and is “envisioned as having the highest building intensities within Sacramento.” This is totally inappropriate for one of the most prominent blocks of historic homes within Boulevard Park. Attached please find a portion of the draft Land Use Map with the boundaries of the Boulevard Park local and national Historic Districts in blue and red, respectively.

This is merely one example of many inappropriate land use designations in the 2040 General Plan Update draft Land Use Map that would jeopardize our valuable historic resources. To preserve historic integrity, all of the proposed land use designations for properties containing Contributing Resources to Historic Districts and individually listed Landmark structures should be consistent with existing patterns of use.

Sincerely,

Dr. Jon B. Marshack

Preservation Committee Chair, Boulevard Park Neighborhood Association
Former Chair of the Preservation Commission

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