



February 15, 2021

Chair Jacqueline Whitlam and
Members of the City of Sacramento Preservation Commission

Sent via Email

PRESERVATION COMMISSION MEETING OF FEBRUARY 17, 2017, AGENDA ITEM 7:
BPNA COMMENTS ON DRAFT LAND USE MAP FOR THE 2040 GENERAL PLAN

The Board of Directors of the Boulevard Park Neighborhood Association (BPNA) has reviewed the proposed land use and development intensity/floor area ratio (FAR) maps and key strategies for their potential impacts on Sacramento's historic resources and residential neighborhoods. We appreciate earlier opportunities to comment on prior versions of these maps and the willingness of city planning staff to make changes to lessen those impacts. We understand from our December 15 meeting with planning staff that on January 19, the City Council was to endorse the proposed Land Use and FAR "framework," but that parcel-specific changes could still be made up to adoption of the 2040 General Plan toward the end of 2021. Due to the complexity of these issues and the sensitivity and irreplaceability of Sacramento's historic resources, it will take some time to ensure their protection.

Below are our comments and concerns. These are virtually the same as those presented to the City Council for their January 19, 2021 meeting, as the maps in your February 17 agenda packet are the same as those provided to the City Council in January.

- 1) We support the proposals to reduce the number of land uses, to substitute regulation of Floor Area Ratios for the current system of dwelling unit densities, and to allow construction of duplexes, triplexes and fourplexes throughout Sacramento's neighborhoods. These measures would simplify our current complex zoning and would allow higher density while managing overall building sizes. Together, these changes would move Sacramento in the direction of "form-based codes," in which the appearance of buildings drives construction. Interestingly, Sacramento's Central City neighborhoods were originally built in this way, with single family homes interspersed with outwardly similar multi-family structures and structures with housing units above neighborhood-serving business.
- 2) Historic resources are best protected by planning and zoning requirements that are consistent with existing conditions. We realize that in addition to the General Plan, development on historic parcels is limited by zoning, the Planning and Development Code, the Historic District Plans, and the Secretary of the Interior's Standards for Treatment of Historic Properties. 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 are led to expect more flexible interpretations and are more apt to apply for deviations, which tend to 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?

- 3) The focus so far of planning staff responses to preservation concerns has been on Historic Districts. However, similar concerns exist with individually listed Landmarks that are outside of Historic Districts, where Sacramento's Historic District Plans are not applicable. We urge the city to 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 and speculation will not place those resources at risk.
- 4) Land uses that favor (1) retention of existing housing and (2) 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 conversion of some residential units to office, commercial, or service-related uses, thereby reducing housing stock. Additionally, 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. Any proposed conversion of existing housing stock to RMU designation should be carefully evaluated and generally discouraged.
- 5) Once the 2040 General Plan has been adopted, we understand that zoning of parcels will need to be adjusted to be consistent with the new land uses and FAR designations. Current requirements of the 2018 Central City Specific Plan include transitional height limitations between higher-density urban corridor commercial parcels and those parcels designated for R-1 or R-3 residential uses. Similar transitional height limitations between "Neighborhood" and RMU and between disparate FAR designations similarly will be needed to prevent larger structures from overshadowing smaller residential structures.
- 6) Current development regulations, including the 2018 Central City Specific Plan, permit the granting of deviations from development standards and guidelines for building height based on the yet-undefined "significant community benefit." The current unlimited system of granting deviations is ripe for abuse and leads to land speculation and the construction of new structures that dominate their neighbors. We recommend a 20 percent cap be imposed on the size of deviations that may be granted with regard to building height and setbacks.
- 7) Below are specific parcel designation issues in the area served by the Boulevard Park Neighborhood Association, based on Land Use and FAR maps included in the staff report. Attached are excerpts of the Land Use and FAR maps for our neighborhood as well as the Boulevard Park and New Washington School Historic District boundaries. While we focused on our neighborhood, we believe that similar issues exist in other Central City neighborhoods, which deserve reconsideration. A careful staff survey is warranted.

- 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 with a FAR of 2.0 on the draft 2040 General Plan Update development intensity map. This park, a character defining feature of both the National Register and the City of Sacramento’s Boulevard Park Historic Districts, should be designated with “No FAR” so that the park use is retained and no buildings are constructed.
- b) Directly east of the Boulevard Park Historic Districts, parcels between Blues Alley and C Street are shown with an RMU land use and FAR of 4.0. Many of these parcels contain existing one-story single-family homes which should be retained. We recommend a “Neighborhood” land use designation and FAR of 2.0 to lessen inappropriate development pressure on these residential parcels.
- c) 1905 I Street is a two-story individually listed Landmark Neoclassic residential structure, currently used for offices, which is inconsistent with the proposed FAR of 6.0. We recommend a FAR of no more than 2.0.
- d) 2100 I Street is a three-story Landmark Neoclassic six-unit residential structure within the Boulevard Park Historic District, which is inconsistent with the proposed RMU land use and a FAR of 6.0. We recommend “Neighborhood” land use and a FAR of no more than 4.0.
- e) Two parcels within the New Washington School Historic District, 1911 and 1912 F Street, are shown with a FAR of 6.0. 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. The Historic District Plans limit building heights in this district to no more than 150% of the height of neighboring Contributing structures. A FAR of 2.0 or 3.0 would be more appropriate for these parcels.
- f) 1827 H Street is a two-story individually listed Landmark Italianate residence proposed to be designated RMU. “Neighborhood” would be more appropriate to preserving this historic structure.
- g) 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.

Sincerely,



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cc: Board of Directors, Boulevard Park Neighborhood Association
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