

December 14, 2005

City of Grass Valley Planning Division,
Grass Valley City Hall,
125 E. Main Street,
Grass Valley, CA 95945

CITY OF GRASS VALLEY
PLANNING DIVISION

APR 04 2006

Re: Comments to Grass Valley City Council on the Economic Study

Dear Grass Valley City Council and Planning staff:

We are submitting these comments on the Economic and Fiscal Conditions Study (Study) for the City of Grass Valley of September 8, 2005. The study was prepared "because the City would like to better understand its baseline and fiscal conditions." The information was to help the City evaluate the four Special Development Areas (SDAs) identified in the 2020 General Plan as to "the proposed land use mixes relative to the market demand, and the timing of the proposed annexations".

The Study concluded that there was a demand for 3,365 new housing units for the period from 2003 through 2020. 840 units would be supplied from infill in the city limits leaving a need to supply 2,525 more housing units from the Sphere of Influence. The Study then concluded that current zoning of the SDAs is insufficient to meet the demand. It also concluded that the annexation proposals oversupplied the demand, and that perhaps a mixed solution was more appropriate.

We believe that there is insufficient evidence to support this conclusion.

We will show that there is a plentiful supply of potential housing to meet projected demand. Following is our analysis of the housing unit demand based on population, pent-up demand, infill housing unit supply and Sphere of Influence housing unit supply for the City of Grass Valley (City) from 2003 to 2020.

Demand for housing based on new population growth

Table 23 of the Study shows a change of population from 2003-2020 for Grass Valley of **7,100 persons** based on 12,000 persons for 2003 and 19,100 for 2020. It also shows Nevada County with a population of 95,700 for 2003 and 133,200 for 2020.

We believe that these figures should be revised to use the latest projected population figures for 2020 for Nevada County. The new figures for Nevada

County are 96,305 for 2003 and 126,812 persons for 2020.^{1 2} The difference is a gain of 30,507 persons for Nevada County from 2003-2020.

Since the Department of Finance provides no population projections for cities for 2020, we must develop the 2020 projection for Grass Valley. We suggest using the Study's original 2020 projection of 7,100 new persons for Grass Valley and 37,500 for Nevada County to develop a ratio between the two (thus, 18.9% of the county's growth will be in Grass Valley). To develop Grass Valley's 2020 new persons' number, we multiply the latest revised county figure of 30,507 new persons by 18.9% to give a population growth projection for 2020 Grass Valley of **5,766 new persons**.

The Study shows that there will be **2,890** new households by the year 2020, based on the original 7,100 population gain divided by 2.45 members per household. Dividing the new figure of 5,766 new persons by 2.45 per household gives a new figure of **2,353** new housing units that need to be supplied.

The result is that there should be a reduction from 2,890 to 2,353 for new housing unit demand.

Demand for housing based on pent-up housing demand

Based on a survey conducted of 557 Grass Valley area residents and 100 Grass Valley employers, the Study concluded there was a pent-up demand for **475** housing units. For the following reasons, we feel that there is no justification for adding any additional housing units based on a "pent-up" demand.

- At the time of the survey in 2003, the median home price was said to be \$288,000. The latest sales data for 80 homes in October 2005 shows the median selling price of a 3 bedroom home in Grass Valley was \$415,000, with incomes rising at a much slower rate of 3% per year. Though the Survey showed 473 could afford a house over \$265,000 (table 26), only 326 could afford a house over \$318,000. Half the renters dropped out at that level. One can only assume that all renters would drop out, and a significant number of home-owners would also drop out at \$415,000.
- The survey did not consider whether those surveyed had the down payment required to buy a house. Affordability assumptions usually assume a 10% down payment (see page 16 Appendix 1 Nevada County Housing Element). This would be \$41,500 for a \$415,000 home.
- The survey showed that 35% were looking for a smaller home and 56% for a larger home. Thus most of this demand will be met by what amounts to an exchange of homes.

¹ State of California, Department of Finance, Population Projections by Race/Ethnicity, Gender and Age for California and Its Counties 2000-2050, Sacramento, California, May 2004.

² This is consistent with a trend of decreasing population projections – in 1998 Nevada County was projected at 136,200.

- The pent-up demand is also skewed by only including employed persons and no retired or non-working households. By multiplying survey results by the per cent of total population surveyed, it assumes everyone is employed. This overstates those unemployed that could not afford a house, and retired persons who would be less likely to move.
- Many of those desiring a house may not buy because of factors such as schools, safety, convenience to downtown, etc.
- What would be left are those that can afford an expensive house, and are part of the group that is currently buying houses and is not pent-up demand.^{3 4}

For all of these reasons, it is our conclusion is that there is no shown justification for adding any additional housing units based on a “pent-up” demand.

Potential Supply of housing within the City of Grass Valley limits (infill)

Existing Infill

The Study on page vi states “The analysis assumes the accuracy of the City’s Housing Element, which identified the City has a sufficient amount of undeveloped land to absorb 1,191 units, and that commercial properties could be developed for a mix of uses that could absorb another 273 units. Thus, **840 housing units** could be developed on existing infill sites assuming that 70 % of the vacant sites are buildable. The analysis also assumes that 40% of commercially zoned infill properties could actually be developed.”

We will show that 840 housing units seriously under-states the potential City infill housing.

The following is our analysis of the infill number of 840 units.

- Using Table III-1 of the Grass Valley Housing Element as a basis of infill is invalid. As Page III-1 of the Element states, criteria for the land inventory for the Housing Element had to accommodate needs by income group, and had to be appropriately zoned for a variety of housing types to meet state regional affordability requirements. Thus, it excludes much vacant land that does not meet the required affordability ratios.
- Table III-1 shows 1,191 potential likely housing units that includes commercial and M1/M2 lands. Non-commercial land is based on a likely density of 80% of the maximum (except R-1 which is 100%) and

³ A legitimate city concern is whether workers are forced to live beyond the city to have affordable housing. But most surveyed already lived in Grass Valley, and of the rest, it is not known whether they want to live within the city limits.

⁴ A separate concern could be unemployment, but current rates are low compared to statewide and also historical rates, indicating that housing demand is not hurting employment.

commercial is based on 15% of the land used for housing. However, as quoted above, 840 units is based on 70% of the likely housing number, a double subtraction of likely housing. 1,191 units should have been used.

- Table III-1 excludes any land less than one acre. Of 40 proposed developments in the City from 2002-2005, half included parcels of less than one acre, and many of these proposed multiple housing units (see appendix 1 - Project applications on infill less than one acre).

We requested a list of all parcels from Nevada County GIS that have an improvement of \$20,000 or less (county criteria for unimproved land). We split the parcels between those in the city limits and those in the Sphere of Influence (SOI).

By applying the city zoning to those parcels within the city limits, and using the city's Housing Element criteria of likely housing, we found there was a likely infill supply of **2,375 housing units**. (See appendix 2 **Grass Valley Potential Infill Housing Units** for a summary of these units by zoning category – a detail parcel list was provided to Joe Heckel 11-23-05).^{5 6}

Projects built on unimproved land since 2003

Additional housing has been provided by new projects since the completion of the 2003 Housing Element. Since these are no longer unimproved land parcels, they are not part of the 2,375 housing units and represent an additional supply of 181 housing units (see appendix 3 **Grass Valley Building Division Annual Report 2004 extract**).

We conclude that the City of grass Valley can fulfill its housing needs by properly utilizing their infill land supply.

Supply of housing within the City of Grass Valley Sphere of Influence.

The Study on page 40 concluded that after subtracting 840 units from 3,365 units (growth demand plus pent-up demand), "Thus, there is still a demand for **2,525 new housing units**, which will, in all probability, not be absorbed within the current city limits. The additional housing demand that cannot be absorbed by infill properties can potentially be absorbed by annexing land within the Sphere on Influence."

Unfortunately, the Study then went on to analyze only the four SDA annexation lands to meet this supply shortage. We feel that this is invalid. **The Study**

⁵ The likely housing criteria was found reasonable by checking the proposed developments for 2002-2005 against the zoning.

⁶ This number slightly understates the infill units, because some of the land has been improved since 2003 and already met some of the housing needs.

completely ignores the potential annexation of land in the Sphere of Influence that does not fall within the four SDAs.

By using the data from the Nevada County GIS for Sphere of Influence lands, applying current County zoning, and using city likely housing criteria, we found there was a likely housing unit supply of 2,325 in the City Sphere of Influence **(See appendix 4 Grass Valley Potential Sphere of Influence Housing for a summary of these units by zoning category - a detail parcel list was provided to Joe Heckel 11-23-05).**⁷⁸

Applying current county zoning is a conservative assumption since, for example, Table 4.11 of the Nevada County Housing Element shows lands that would yield 305 housing units under County zoning, and 1,374 units under city zoning. The City also has policies that allow density bonuses beyond existing zoning.

It is likely these some of these other SOI lands will be annexed, since the City Implementation program for the Housing Element is to "take the initiative by identifying those sites most appropriate for annexation" and "by contacting the property owners and encouraging them to plan land for annexation to the city". The City shall concentrate its annexation efforts on unincorporated sites adjacent to the City, which can be readily served by the City's sewer system and that have the capacity to accommodate development of a mix of low- and moderate income housing." (see Program 1: Adequate Sites for Housing (Section IV D Page 22 of the Grass Valley Housing Element).

LAFCO has already approved additional annexations outside of the 4 SDAs. These include West E, West F, and West G in the Glenbrook basin that were scheduled for 2005 that have a potential for 27 new housing units. **(see appendix 5 Vacant Land - LAFCO approved annexations 2005 – Glenbrook).** Note: Future annexation proposals should meet the requirement of legitimate infill, which is generally defined as properties bordered on three sides by current city limits.

In addition, there are two other SDAs, one of which already is in Nevada County planning (*Winds Aloft*). It is asking for 28 housing units and 10% second units. There will probably be other projects within the Grass Valley Sphere of Influence that will be developed prior to annexation that meet growth demand.

The table on the next page summarizes our findings.

⁷ This includes the SDAs at their current zoning.

⁸ This number slightly understates the likely units because as SOI land is annexed, it could acquire a higher zoning density because of sewer capacity, etc.

Comparison of corrected data versus the Study data.

Category	Corrected data	Study alt 1	Study alt 2	Study alt 3
Demand				
Population growth demand	2353	2890	2890	2890
Pent-up demand	0	475	475	475
Total demand	2353	3325	3325	3325
Infill Supply				
Existing infill supply	2375	840	840	840
2004 occupancy permits	181	0	0	0
Total Infill	2556	840	840	840
SOI annexation need	203-	2525	2525	2525
SOI supply				
Non-IDR lands	1625	0	0	0
2 Other IDR lands	52	0	0	0
4 SDA IDR proposals	648	648	4411	1139
Total SOI supply	2325	648	4411	1139
Unmet demand or over supply	(2528-)	1877	(1886-)	1386

Note 1: all numbers represent housing units

Note 2: a negative number indicates supply exceeds demand

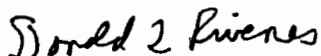
Conclusion

Our calculations show that existing city potential infill can more than meet the City's growth needs until the year 2020 (203 housing unit excess).

Already LAFCO approved annexations for Glenbrook will add further to this supply.

Thus, it should be clear that evaluation of the four annexations should be based on the vision of the community for a future Grass Valley, and not be driven by a unjustified need to satisfy population growth demand and the desires of four developers.

Sincerely,



Donald L Rivenes

Nevada County General Plan Defense Fund

Appendix 1

Proposed infill projects with at least one parcel less than one acre 2001-2005

APN	Acres	City's dev #	Location	Existing zoning	DRC review	Units	Comments
08-310-91	.24	05DRC-01	North Church street	R-3	1/25/05	2	New
29-230-21	.21	04DRC-33	So of Freeman Ln	C-2	10/26/04	4	New
29-161-10	.33	04DRC-35	421 S Auburn	C-1	6/22/04	5	New
09-261-05	.20	04DRC-31	337 Bennett St	R-3	05/25/04	2	Add to existing
08-343-09	.27	DR03-21	619 S Auburn	C-2	09/09/03	12	New apts
08-350-01(I)	.41						
35-320-18	.34	04DRC-07	Catalpa	C-2	8/26/03	39	New affordable housing
35-320-19	.12			R-2A			
35-320-21(I)	.77						
35-320-22(I)	.81						
35-320-49	2.08						
35-320-60	.18						
35-260-18	.69						
29-260-04	2.82	04-DRC-54	Adam Ln	R-2	04/08/03	91	New duplex and apt
29-270-06	1.12			M-1			
29-270-10	1.27						
29-290-03	3.89						
29-280-02	.04						
29-280-03	.23						
29-280-05	.25						
29-280-06	.47						
29-191-13	.70	DRO-43	463 S Auburn	C-1	8/14/01	8	New plus office
29-160-10	.17	05PLN-01	456 S Auburn	C-1	N/A	1	New house
29-190-23	.45	TMO-05	134 1/2 W Empire	R-1	N/A	1	Lot split
29-190-24	.36						

(I) = improved parcel

Appendix 2

Grass Valley Potential Infill Housing (within City Limits as of 11-01-2005)

District	Description	Lot size Sq ft	Unit Size Sq ft	Max Houses per acre	% land for housing	Likely Houses per acre	# of parcels	Total Acres	Total Units
RE	Residential Estate District	acre		1	100%	1	0	0	0
R-1	Single-family	10000	25% lot	4	100%	4	236	170.32	681
R-1-X	Single-family			4	100%	4	5	2.89	11
R-2	Two-family	10000	25% lot	4	100%	4	6	6.18	22
R-2A	Medium density	10000	3500	12	100%	9.6	4	4.64	45
R-2AMH7200	Medium density			12	100%	9.6	3	26.74	257
R-3	Multiple family	10000	2000	20	80%	16	40	15.99	256
R-3(3100)	Multiple family			20	80%	16	8	4.33	69
R-3(3500)	Multiple family			20	80%	16	1	2.08	33
OP	Office professional	10000	2000	20	15%	3	10	17.38	53
OS	Open space			20	15%	0	2	4.72	0
C-1	Community Business	No min.	3500	12	15%	1.8	6	2.83	5
C-2	Central Business	No min.	2000	20	15%	3	93	84.23	253
C-2A	Downtown centril business	No min.	2000	20	15%	3	1	.23	1
C-2H	Downtown centril business	No min.	2000	20	15%	3	4	.33	0
C-3	Heavy Commercial	No min(UP)	2000	20	15%	3	5	3.41	10
C-3D	Heavy Commercial	No min(UP)	2000	20	15%	3	1	1.99	6
CBP	Litton Business Park	No min(UP)	2000	8	100%	7.36	11	41.83	308
H	Historical	No min(UP)	2000	-	15%	3	1	.18	0
M-1	Light Industrial	No min(UP)	2000	20	15%	3	39	52.29	157
M-2	General Industrial	No min	2000	20	15%	3	1	.15	0
M-L	Limited manufacturing	10000	3500	12	15%	1.8	0	0	0
SP1-A	Special project			20	15%	3	21	50.26	151
SP1-B	Special project			20	15%	3	4	6.50	20
SP1-C	Special project			20	15%	3	1	6.79	20
SP4-D	Special project			20	15%	3	1	.16	0
SP4-E	Special project			20	15%	3	7	1.90	6
SP4-G	Special project			20	15%	3	15	3.60	11
Total Infill									2375

Note 1: Total infill units includes 15.55 R-1 acres for 62 units where R-1 lot size does not meet minimum lot size requirement.

Note 2: Per cent land for housing is based on criteria used in Table III-1 of Grass Valley Housing Element

Note 3: Litton CBP is based on actual project proposal submitted 8/26/2003 currently withdrawn.

Appendix 3
GRASS VALLEY BUILDING DIVISION
ANNUAL REPORT
2004

- **Finalied New Residential units total one-hundred-eighty-one (181):**
 - **Eighty-five (85) detached single family dwellings**
 - **Three (3) modular single family dwellings were completed**
 - **Multi-family units total ninety-three (93)**

SUMMARY

BUILDING TYPE	ISSUED: UNITS/ PERMITS	ISSUED SQUARE FOOTAGE	FINALED: UNITS/ PERMITS	FINALED: SQUARE FOOTAGE	2004 INSPECTIONS	2004 PLAN CHECKS
NEW RESIDENTIAL UNITS	26 SFD'S on 26 permits	47,963	88 SFD's on 88 Permits	Not available	Not available	26
NEW MULTI-FAMILY UNITS	55 SFD's on 8 Permits/Bldgs	53,007	93 SFD's on 4 Permits/Bldgs	Not available	Not available	8
NEW COMMERCIAL BUILDINGS	9 Comm/Bldg On 9 Permits	90,985	10 Comm Bldgs On 8 permits	35,697	Not available	9
NEW PUBLIC BUILDINGS	0	0	0	0	N A	0
ALL OTHER PERMITS	530 Permits	Not available	439 Permits	Not Available	Not available	155
TOTAL	81 SFD's 9 Comm Bldg 573 Permits	191,955 SqFt	181 SFD's 10 Comm Bldgs 538 Permits	Not available	2007 Inspections	198 Plan Checks

Cc: City oil Grass Valley Department Heads City of Grass Valley City Council
City of Grass Valley Planning Commission City of Grass Valley Community Development Depart
Nevada County Contractors Association Dan Landon, Nevada County Transportation Commission

Appendix 4

Grass Valley Potential Sphere of Influence Housing

GP	Zoning	Description	Minimum Acres	Max Houses per acre	% land for housing	Likely Houses per acre	# of parcels	Total Acres	Total Units
USF	R1	Single family	1.5	4	100%	4	19	3.85	15
RES	R1-1.5	Single-family	1.5	4	100%	4	60	58.90	236
RES	R1-1.5SP	Single-family	1.5	4	100%	4	2	1.00	4
USF	R1-PD-SP	Single-family	1.5	4	100%	4	4	.84	3
USF	R1-X	Single-family	1.5	4	100%	4	1	1.00	4
UMD	R-2	Medium density	1.5	6	100%	6	1	95.43	573
UHD	R-2-PD-1	Medium density	1.5	6	100%	6	5	43.95	264
EST	RA-1.5	Residential agricultural	1.5	1	100%	1	1	5.90	1
RES	RA-1.5	Residential agricultural	1.5	1	100%	1	51	372.96	373
UMD	RA-1.5	Residential agricultural	1.5	1	100%	1	3	12.43	12
EST	RA-3	Residential agricultural	1.5	.33	100%	.33	2	27.68	9
RES	RA-3	Residential agricultural	1.5	.33	100%	.33	1	6.20	2
RUR-5	RA-5	Residential agricultural	1.5	.2	100%	.2	1	4.51	0
BP	BP	Business Park		4	15%	.6	39	203.22	121
NC	C1	Neighborhood		4	15%	.6	3	1.08	1
CC	C2-SP	Community		4	15%	.6	3	.82	0
IND	M1	Light Industrial		0	0	0	57	203.81	0
PUB	M1	Light Industrial		0	0	0	1	2.03	0
IND	M1-PD	Light Industrial		0	0	0	1	5.27	0
IND	M1-SP	Light Industrial		0	0	0	9	69.86	0
RES	M1-SP	Light Industrial		0	0	0	1	1.38	0
OP	OP	Office professional		4	15%	.6	17	10.90	7
OS	OS-SP			0	0	0	1	2.64	0
UHD	P	General Industrial		0	15%	0	1	.38	0
Total	Non-IDR								1625
SDA	IDR	Winds aloft					1	45.36	31
PD	IDR	West F Glenbrook					12	9.44	21
Total	Other IDR								52
SDA	IDR	Loma Rica					11	449.55	185
SDA	IDR	North Star					24	733.10	363
SDA	IDR	Kenney					11	355.35	100
SDA	IDR	South Hill					8	66.03	0
Total	Big-4								648
Total	All								2325

Note 1: Zoning is based on Nevada County General Plan. No "likely" factor applied. GV may change zoning when annexed.

Note 2: R1-3, RA lands were not reduced because of 1.5 acre limit, assuming sewer connections when annexed

Appendix 5

Glenbrook Sphere Of Influence 2005 Annexations including Vacant Land Total Likely New Units (based on annexation city prezoning) = 27

West E – 39 improved parcels (est. 29 acres, est. 19 existing units)

0 likely new units

Vacant Parcel #	Impr.	Acres	General Plan	County Zoning	City Zoning	Max Units	Likely Units

West F – 12 improved parcels (est. 29 acres, est. 0 existing units)

22 likely new units

Vacant Parcel #	Impr.	Acres	General Plan	County Zoning	City Zoning	Max Units	Likely Units
35-221-11		1.04	PD	IDR	CBP	3	2
35-221-74		.05	PD	IDR	C-2	0	0
35-221-79		2.77	PD	IDR	CBP	8	6
35-600-01		.26	CC	C2-SP	C-2	.6	0
35-600-03	Road	.73	PD	IDR	CBP	0	0
35-600-04		3.14	PD	IDR	CBP	9	7
35-600-05	6449	.19	CC	C2-SP	C-2	.6	0
35-600-07		.37	CC	C2-SP	C-2	.6	0
35-610-01		.25	PD	IDR	C-2	1	1
35-610-08	1778	.55	PD	IDR	C-2	1	1
35-610-09	732	.24	PD	IDR	C-2	1	1
35-610-10	1243	.20	PD	IDR	C-2	1	1
35-610-11	2106	.16	PD	IDR	C-2	1	1
35-610-12		.06	PD	IDR	C-2	0	0
35-610-15		.25	PD	IDR	CBP	1	1
Total		10.26					21

West G – 13 improved parcels (est. 15 acres, est. 13 existing units)

5 likely new units

Vacant Parcel #	Impr.	Acres	General Plan	County Zoning	City Zoning	Max Units	Likely Units
35-200-53	Road	.15	RA-1.5	ULD-4		0	0
35-221-16	10000	.67	R1-1.5	ULD-4		3	2
35-221-19	817	.42	OP	OP-20		1	1
35-221-62		.16	R1-1.5	ULD-4		0	0
35-221-69		.29	R1-1.5	ULD-4		1	1
35-280-14		.06	R1-PD	OP-20		0	0
35-610-04		1.03	OP	OP-20		3	2
35-610-06	0,0	.29	OP	OP-20		0	0
Total		3.07					6

APR 04 2006



December 12, 2005

Mr. Joe Heckel
Community Development Director
City of Grass Valley
125 East Main Street
Grass Valley, CA 95945

Clerk of the City Council
City of Grass Valley
125 East Main Street
Grass Valley, CA 95945

Subject: Economic and Fiscal Conditions Study, September 8, 2005

Greetings:

The Rural Quality Foundation wishes to submit our comments on the SDA Economic Study, after review by our concerned volunteers. This is, of course, the beginning of a careful process of informing and being informed on the consequences of major, and hopefully, good decisions by the City. We hope that this input can help to bring about such outcomes.

Our detailed comments are provided in the attachment entitled **RQF Comments on SDA Economic and Fiscal Conditions Study, December 13, 2005**. We look forward to the City's responses on these and all of the community's inputs to this Study.

Sincerely yours,

Paul Jorgensen
President

1. Previous Points Needing Response

1.1 The Rural Quality Coalition provided the Council with comments on the Phase I Baseline Report in a letter dated July 28, 2004. Key unanswered points from that letter are repeated below.

1.1.1 (The Study) Fails to consider the implications on population, jobs, and housing of the fact that nearly a third of Nevada County's population is retired, retiring, or self-employed. This has to make a difference in the projected population and in the type and numbers of projected housing, as well as jobs and public services needed.

1.1.2 (The Study) Fails to demonstrate the basis for its assertion that the projected population will grow at an annual rate of 1.2 percent. It further fails to explore what ranges of growth above and below 1.2 percent would mean for the City, in terms of population, housing, and jobs.

1.1.3 (The Study) Fails to explore adequately the implications of the two-thirds of Nevada County population which lives outside the incorporated areas, but which uses the cities for its services, jobs, and commerce.

1.1.4 (The Study) Inappropriately applies the Jobs/Housing Balance ratio, a flawed indicator at best, without considering that the County's large numbers of retired persons have no jobs and do not intend to obtain one.

2. The Two Projection Numbers: Flawed Evaluation

2.1 The Study derived projected figures for 2020 population and employment separately, from two different State agencies, accepted those numbers without evaluation, and based the entire study calculations on them.

2.1.1 What other indications, such as local County birth and death rates, or local migration estimates, or new-business and employment indicators, support the derived State projections?

2.1.2 What are the economic and fiscal impacts if the projected population change were substantially greater than, or less than, the 2020 projected population?

2.1.2.1 a) 1.5 times the projected population change?

2.1.2.2 b) one-half the projected population change?

2.1.3 What are the economic and fiscal impacts if the projected employment change were substantially greater than, or less than, the 2020 projected employment?

2.1.3.1 a) 1.5 times the projected employment change?

2.1.3.2 b) one-half the projected employment change?

3. Capital Costs: Ignored

- 3.1 There is no treatment of capital projects and capital costs implied by the SDA's.
 - 3.1.1 What capital projects would be needed to support the SDA's
 - 3.1.1.1 School classrooms?
 - 3.1.1.2 Fire Station?
 - 3.1.1.3 Street Improvements?
 - 3.1.1.4 Water Treatment Capacity?
 - 3.1.1.5 Sewage Treatment Capacity?
 - 3.1.1.6 Recreation and Parks Facilities?
 - 3.1.2 What capital expenditures would be required for each?
 - 3.1.2.1 How much?
 - 3.1.2.2 Who would pay for them?
 - 3.1.2.3 Are the City's development fees commensurate with those costs?

4. Infill and Annexation: Limited Analysis

- 4.1 The study applied the demand beyond the infill capacity of the city to the four SDA areas. More properly, any excess demand should be applied to the entire Sphere of Influence.
 - 4.1.1 What is the housing potential in the entire Sphere of Influence under existing zoning?
 - 4.1.2 What is the buildable land and housing potential in the Sphere of Influence areas that will be annexed between now and 2020?
 - 4.1.3 What share of this potential should be applied to the four SDA's?

5. Other Agencies in Western Nevada County: Ignored

- 5.1 The Study did not address the economic and fiscal impacts of the proposed SDA's on the operating and fiscal conditions of other public agencies in Western Nevada County.
 - 5.1.1 What are the economic impacts of the SDA's on other agencies in Western Nevada County?
 - 5.1.1.1 Economic impacts?
 - 5.1.1.2 Operating Costs?
 - 5.1.1.3 Capital Costs?

6. Cumulative Impacts

- 6.1 Section 11. Recommendations for Project Specific Impact Analysis, addresses only the individual SDA projects. However appropriate, these recommendations miss the largest point of concern. Taken separately, the incremental impacts of any one SDA ignore the impacts, fiscal and otherwise, of all four projects taken together. Together they involve a substantial, cumulative impact on the community. Serial treatment ignores cumulative effects. The City's largest decision is about the combined effect of all four SDA's. Where are the comprehensive impacts of all SDA's identified?

7. Other Detailed Comments

7.1 Rural Quality Foundation urges the Council to give full and serious consideration to the detailed land and housing issues raised in their letters by the General Plan Defense Fund, and the circulation issues raised by the Citizens Concerned About Traffic.

Presentation to the Grass Valley City Council
by the
Loma Rica Ranch Preservation Committee
October 20, 2005

The Loma Rica Ranch Preservation Committee is committed to preserving approximately 200 acres of the ranch, including the horse ranch, as a regional park. In addition, we are opposed to any increase to the original 180 homes allowed on the ranch property by both the Grass Valley and Nevada County General Plans unless the increase in houses is accompanied by clustering off of the 200 acre proposed park site.

Unfortunately, the economic study is pointing to a dramatic increase in the ultimate buildout number on the ranch and the annexations... in excess of General Plan levels.

On Loma Rica, this would result in significant impacts, most dramatically - traffic impacts. The Loma Rica developer is proposing 1000 additional houses over those permitted by the General Plan on the property. This housing increase alone would add 7000 vehicle trips per day to the Brunswick Basin. With the proposed commercial and industrial, 32,000 vehicle trips per day would be added - 4 times what the current General Plan designations would allow. You can see that the impacts go beyond the economic!

The rationale behind the study's conclusion on housing supply is flawed. The study must be revised. The study did not inventory the existing vacant residential zoning areas in the rest of the Grass Valley Sphere of Influence. This creates a supply of potential housing that makes increasing the permitted buildout on Loma Rica Ranch and the other annexation sites unnecessary. I am sure the landowners in the Grass Valley Sphere of Influence would be surprised to hear that they are not expected to build on their properties!

We encourage you to set up a public participation process on all of the issues surrounding the annexations before you accept the SDA applications.

Thank you.

CITY OF GRASS VALLEY
PLANNING DIVISION

APR 04 2006

CCAT MEMO
from
Citizens
Concerned
About Traffic



Concerns about Western Nevada County
contact: info@ccatnc.org or
P.O. Box 1771, Nevada City, CA 95959-1771

To: Bobbi Poznik-Coover, City Clerk
Subject: Comments Re: *Economic and Fiscal Conditions Study for the City of Grass Valley, September 8, 2005*
Date: December 1, 2005

POINT #1 – POPULATION PROJECTIONS FOR NEVADA COUNTY

This projection is important - - because it drives the entire Study. The Study's 2020 population of 134,000 (Study, page 22, Section 3.1) is over 7,000 or 5.5% greater than the State of Department of Finance's estimate of 126,912 (*Population Projections by Race/Ethnicity, Gender and Age Report 03, P-3, May 2004 – see Attachment 1*). This is a major discrepancy - - the Study says growth of 2.3% average annual growth, but the State says 1.8%. Although the Study Consultants indicated California Department of Finance estimates were used extensively for population analyses, for some reason the State's projections were not used for the 2020 Nevada County population.

- Another population problem is that of projecting Grass Valley's population based on history - - between January 1, 2000, the base year of the Report and 2003 the last year for the Report's data point, the City has consummated 23 annexations accounting for over 411 acres - - and many of these acres had population which was new to Grass Valley, but not new population for purposes of projecting growth (see Attachment 2).
- New growth only comes from 2 functions
 - 1) internal growth – more births than deaths
 - 2) migration – more moving in than moving out

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NOT growth from changing boundaries - - example: if the unincorporated County has 200 people and GV has 100, City annexes 100, the City doubled, but this does not represent 100 new people to the area.

POINT # 2 – TRAFFIC IMPROVEMENTS – CAPITAL REQUIREMENTS

- CCAT maintains that if the Report is to be a fiscal study, it should have addressed the capital requirements for traffic improvements and the carrying costs of such improvements. Public comments by the City's Consultant during the October 27, 2005 SDA Study Public Workshop indicated the Report specifically excluded such analysis. Why?

*CCAT's objective is to have development in Western Nevada County take place in a measured way,
by having potential traffic problems solved before they arise.
New traffic problems should not be allowed until current problems are fixed.*

Letter 4

POPULATION PROJECTIONS BY RACE/ETHNICITY, GENDER AND AGE REPORT 03 P-3

AGE	NEVADA TOTAL JULY 1, 2020			NEVADA WHITE JULY 1, 2020			NEVADA HISPANIC JULY 1, 2020			NEVADA ASIAN JULY 1, 2020		
	MALE	FEMALE	TOTAL	MALE	FEMALE	TOTAL	MALE	FEMALE	TOTAL	MALE	FEMALE	TOTAL
ALL	60,602	66,310	126,912	51,552	57,140	108,692	9,448	4,563	14,011	2,262	987	3,249
0-4	3,977	3,661	7,638	3,443	3,184	6,627	536	282	818	138	76	214
5-9	3,559	3,447	7,006	3,009	2,945	5,954	537	284	821	172	93	265
10-14	3,425	3,343	6,768	2,823	2,779	5,602	594	312	906	202	108	310
15-19	3,564	3,397	6,961	2,857	2,760	5,617	695	364	1,059	196	105	301
20-24	4,020	3,635	7,655	3,289	3,007	6,296	695	373	1,068	166	83	249
25-29	5,165	4,764	9,929	4,501	4,149	8,650	610	328	938	145	77	222
30-34	5,602	5,599	11,201	4,967	4,995	9,962	542	286	828	128	58	186
35-39	4,985	5,323	10,308	4,349	4,735	9,084	600	328	928	125	43	168
40-44	3,396	4,100	7,496	2,826	3,502	6,328	640	352	992	138	47	185
45-49	2,863	3,811	6,674	2,262	3,125	5,387	733	378	1,111	165	47	212
50-54	2,943	3,815	6,758	2,351	3,157	5,502	740	393	1,133	149	40	189
55-59	3,267	4,164	7,431	2,713	3,519	6,232	702	348	1,050	125	40	165
60-64	3,560	4,442	8,002	3,083	3,872	6,955	560	280	840	98	35	133
65-69	3,473	4,335	7,808	3,091	3,835	6,926	477	219	696	95	32	127
70-74	3,114	3,441	6,555	2,814	3,068	5,882	351	164	515	71	29	100
75-79	1,838	2,210	4,048	1,617	1,991	3,608	201	94	295	49	27	76
80-84	1,038	1,375	2,413	914	1,257	2,171	112	47	159	27	15	42
85+	813	1,448	2,261	633	1,260	1,893	123	53	176	73	31	104
NEVADA AMERICAN INDIAN JULY 1, 2020												
ALL	38	41	79	417	474	891	3,316	1,626	4,942	1,117	1,105	2,222
0-4	0	0	0	7	7	14	150	79	229	173	90	263
5-9	0	0	0	5	5	10	184	90	274	149	78	222
10-14	0	0	0	11	10	21	222	104	326	127	66	193
15-19	0	0	0	35	29	64	233	122	355	156	81	237
20-24	2	2	4	50	37	87	251	137	388	156	86	242
25-29	0	0	0	65	65	130	221	118	339	173	76	249
30-34	1	1	2	68	78	146	223	127	350	198	95	293
35-39	10	5	15	63	66	129	191	107	298	164	85	249
40-44	4	5	9	29	60	89	198	93	291	94	45	139
45-49	7	5	12	7	36	43	234	104	338	100	58	158
50-54	3	0	3	11	21	32	238	105	343	88	40	128
55-59	3	2	5	11	23	34	251	115	366	84	39	123
60-64	8	6	14	8	13	21	242	107	349	108	55	163
65-69	4	3	7	12	4	16	171	72	243	119	46	165
70-74	9	5	14	7	9	16	125	48	173	101	48	151
75-79	7	4	11	7	5	12	90	46	136	81	44	125
80-84	1	1	2	11	1	12	42	21	63	48	30	78
85+	2	2	4	10	5	15	52	31	83	103	55	158
NEVADA MULTIRACE JULY 1, 2020												
ALL	38	41	79	417	474	891	3,316	1,626	4,942	1,117	1,105	2,222
0-4	0	0	0	7	7	14	150	79	229	173	90	263
5-9	0	0	0	5	5	10	184	90	274	149	78	222
10-14	0	0	0	11	10	21	222	104	326	127	66	193
15-19	0	0	0	35	29	64	233	122	355	156	81	237
20-24	2	2	4	50	37	87	251	137	388	156	86	242
25-29	0	0	0	65	65	130	221	118	339	173	76	249
30-34	1	1	2	68	78	146	223	127	350	198	95	293
35-39	10	5	15	63	66	129	191	107	298	164	85	249
40-44	4	5	9	29	60	89	198	93	291	94	45	139
45-49	7	5	12	7	36	43	234	104	338	100	58	158
50-54	3	0	3	11	21	32	238	105	343	88	40	128
55-59	3	2	5	11	23	34	251	115	366	84	39	123
60-64	8	6	14	8	13	21	242	107	349	108	55	163
65-69	4	3	7	12	4	16	171	72	243	119	46	165
70-74	9	5	14	7	9	16	125	48	173	101	48	151
75-79	7	4	11	7	5	12	90	46	136	81	44	125
80-84	1	1	2	11	1	12	42	21	63	48	30	78
85+	2	2	4	10	5	15	52	31	83	103	55	158

Attachment 1

ANNEXATIONS TO CITY OF GRASS VALLEY

Source: LAFCo

Date	Resolution	Description	Acres	Pop	Comments
1/18/1990	90-01	Robertson	1.00	?	
5/24/1990	90-05	Carriage House	36.40	no	
5/16/1991	91-03	Townsend	0.28	?	
11/21/1991	91-07	Fitzgerald	1.84	?	
1/17/1992	92-01	Holderbein	1.49	?	
1/17/1992	92-02	Baird/Hughes	22.66	?	
11/8/1992	92-10	Scotia Pines	19.00	no	
11/18/1993	93-13	Sierra Nevada Mem Hospital	17.38	no	
4/28/1994	94-05	Catherine Lane	9.47	yes	
6/16/1994	94-04	Aiello	15.27	yes	
3/21/1996	96-02	Leasure	0.46	yes	1 DU
11/21/1996	96-10	Robertson	0.18	?	
8/21/1997	97-05	Doris Dr	25.00	yes	
11/24/1997	97-09	Brunswick Inn	10.32	yes	
2/26/1998	98-01	NID Administrative Offices	18.42	no	
11/19/1998	98-11	Canon	11.84	yes	1 DU
1/18/1999	99-01	Slate Creek	99.15	yes	
5/20/1999	99-05	Novo-Coleman/Richardson-Cooley + Olympia Glade	15.48	yes	25.80 less #97-09
10/21/1999	99-08	Rogers	26.51	?	
5/18/2000	00-07	Hess (Record Connection)	5.43	no	
12/20/2001	01-09	Olympia Plaza II + Add'l	42.94	no	
12/20/2001	01-10	Glenwood Pines + Add'l	29.18	yes	
12/18/2003	03-14	Jordan Property	2.33	yes	
TOTAL BETWEEN JANUARY 1, 2000 and DECEMBER 31, 2003			411.81		

23 annexations; 6 without population; 10 with identified/known population and 7 with no specific references to whether there residents of the areas

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Comments to Grass Valley City Council on the Economic Study
From: Sierra Foothills Audubon Society
Date: December 14, 2005

I am writing on behalf of the 166 members of the Sierra Foothills Audubon Society that live in the Grass Valley city limits and the Sphere of Influence of the City of Grass Valley as well as for the other 325 members that live in western Nevada County, all of whom will be impacted by the 4 annexations proposals.

**SIERRA
FOOTHILLS
AUDUBON
SOCIETY**

**P. O. BOX 1937
GRASS VALLEY, CA
95945-1937
Voice mail:
530-272-0981**

MISSION STATEMENT:

**IT IS THE MISSION OF
THE
SIERRA FOOTHILLS
AUDUBON
SOCIETY
TO
EDUCATE
OURSELVES
AND OTHERS
TO
THE VARIETY
AND THE
BEAUTY OF
OUR
NATURAL
ENVIRONMENT
AND TO
PROTECT OUR
WILDLIFE
AND
NATURAL PLACES**

We are concerned that the Economic Study does not take into consideration all of the fiscal costs associated with increasing the housing densities for the 4 annexations. It is well recognized that the price of housing depends directly on the location of the housing. The boom in prices in our area is associated with our beautiful foothill location, our access to wonderful cultural opportunities, and our close proximity to environmental amenities such as the Yuba River, the Tahoe National Forest, and local trails,

But these amenities we take for granted can be offset by increasingly poor air quality causing health problems such as asthma, additional traffic tie-ups, sewer and well failures, crowded recreation sites, loss of wildlife and increased threat of wildfires. This not only impacts the quality of life, but our community economic health could be affected if tourism is lost.

By using inflated demand data as shown in the Study, we actually facilitate growth beyond what local demand would require. As we become less rural, families that moved here earlier for its rural quality will be forced to move to even more remote areas migrating sprawl to those areas.

We are already having significant unavoidable impacts. These will only increase as build-out continues. We must take a long, hard look at any project that calls for increasing densities that will only exacerbate these impacts. Even though the General Plan allows 648 houses in these 4 annexations, there is no legal requirement to allow these densities if community impacts are too great. Mitigation costs and cumulative impacts must be assessed in the Economic Study.

We are concerned about the cumulative impacts that major development in the SDAs will have on our lives - traffic, air quality, noise, public services, sprawl, and our small town quality of life. These issues have major economic impacts. Can we afford them?

If and/or when the economic study is accepted, another series of community meetings should be held to discuss all of the SDA issues including air and water quality traffic, natural resources, open space protection, etc. so that the City can determine how to proceed. This must be done before the SDA applications are accepted!

Sincerely,
Christina Sherr, President



SIERRA NEVADA GROUP

MOTHER LODE CHAPTER

SIERRA CLUB

December 12, 2005

CITY OF GRASS VALLEY
PLANNING DIVISION

APR 04 2006

Grass Valley City Council
Grass Valley City Hall
125 E. Main Street
Grass Valley, CA 95945

Re: Economic Study on the proposed SDAs

Dear Members of the Council:

I would like to applaud your willingness to invite public comment and dialogue at this very important juncture in Grass Valley's historical and future development. And I hope that any new information and perspective that arises from the comments of the concerned and dedicated groups will be seriously considered.

The Sierra Nevada Group of the Sierra Club has been an active participant in the Caucus of Community Groups since its inception and agrees with their guiding principles (attached). I believe they were submitted in previous testimony before you from the seven groups.

In previous oral comments before the Council I enumerated a number of the environmental concerns that the Sierra Nevada Group has regarding the scale of development posed by the four SDAs which were the subject of the Economic Study. We still consider those comments as valid and are also attached for the record.

The Economic Study was not designed to look at impacts other than whether or not the SDAs satisfied housing demand and possibly retail/commercial. It is a fault of the study design that the externalities (environmental costs) of reducing clean air and water, rural quality, recreational opportunity and open space among others were not considered. Even a cursory examination of those impacts could help to refine the Council's thinking on the scale and timing of the four SDAs.

Letter 6

Regional conservation planning bodies of the Sierra Club in California have been developing guidelines to aid in determining how Sierra Club can promote healthy communities by fostering growth which minimize negative effects on the natural environment, agriculture and human health. We can be positive about projects which encompass responsible growth; perhaps a subset of the highly visible "smart growth" guidelines, but not embracing all aspects in all settings. The guidelines are not fully developed at this writing, but will include such items as,

Is the project: located within infill, served by public transit and will ensure that it will actually be used, minimize vehicle miles traveled to, aid in reducing air pollution, pedestrian and bicycle friendly, zoned for inclusionary zoning for affordable housing, high density residential, mixed-use, neighborhood retail and fully funded for all infrastructure costs.

We would like to respectfully associate ourselves with comments developed by other members of the Caucus and thank you for consideration of our individual comments.

Sincerely,



Barbara Rivenes, Chair
Sierra Nevada Group, Sierra Club

Comments to Grass Valley City Council on the Economic Study
From Sierra Nevada Group/Sierra Club
Date: October 27, 2005

I am speaking tonight on behalf of the 316 members of the Sierra Club that live in the sphere of influence of Grass Valley as well as the other 812 members that live in western Nevada County, all of whom will be impacted by the 4 annexations proposals.

It has already been recognized by the Nevada County General Plan that countywide there are significant unmitigated impacts such as open space and farmland conversion, state and cities/town roadways operating at unacceptable levels, increased noise levels along roadways, increased demand for surface water and groundwater, increased wastewater flows and wastewater facilities, lack of school facility capacity, and increased exposure to wildland fire.

Each of the Economic Study alternatives, even the one that adheres to the current General Plan, will have fiscal and societal impacts beyond the ones that this study deals with. These include:

- 1) Existing traffic problems will only be increased as infill occurs
- 2) Air quality currently does not meet standards and can only worsen
- 3) Recreational demand will increase as infill continues (Yuba river use, national forests, etc.)
- 4) Infrastructure costs will escalate with time due to aging, oil price rises, and federal/state debt that reduces share to local communities
- 5) Potential impacts on water supply due to global warming and competing interests
- 6) Wildlife impacts as corridors get pinched
- 7) Cumulative impacts from county and neighboring county development

But increasing density for SDA housing will cause additional impacts:

- 1) Pressure to expand highway 49
- 2) New localized traffic problems
- 3) Additional air quality impacts
- 4) Inadequate low-cost housing in proposals
- 5) Infrastructure needs passed on to public entities
- 6) Infrastructure not being completed within the SDAs
- 7) Loss of rural quality causing people to move from the county
- 8) Ground water impacts
- 9) Reduction of open space

These issues have major economic impacts. Is this level of development what our community really wants? Can we afford it?

At the recent Sustainability Conference, more than one speaker said that we have to start putting an economic value on our area's ecological services – clean water, clean air, soils and the sequestration of carbon in our forests – they could have market value in the future. In addition, we need to value economically the rural quality of life that we all experience.

To ensure this happens, the community needs a participation process to be established on the annexations, so that we can agree on a community vision for Grass Valley. As a first step, the City should direct the economic consultants to respond to the community's comments on the study in writing and at a follow-up meeting. If/when the economic study is accepted, another series of community meetings should be held to discuss all of the SDA issues including those mentioned earlier, so that the City can determine how to proceed. This must be done before the SDA applications are accepted!

Adopted Principles for Good Growth in Western Nevada County

Sierra Foothills Audubon Society
Citizens Concerned About Traffic
General Plan Defense Fund
Grass Valley Neighbors
Loma Rica Ranch Preservation Committee
Rural Quality Coalition
Sierra Nevada Group of the Sierra Club

August 19, 2005

Background

1. Western Nevada County faces a potential of four annexation applications to the City of Grass Valley, each of which has requested far more housing units than allowed under either the County or City General Plans.
2. Both General Plans already permit substantial growth of at least 60,000 more people and would need to be amended to allow the additional growth proposed by the developers.
3. As population increases, there is increased pressure on public assets, such as parks, open spaces, trails, creeks and wetlands, wildlife habitat and wildlife corridors.
4. Neighboring counties are growing at high rates, which, if they were to extend to Nevada County, could not be supported without significant loss of history, culture and environmental quality.
5. Neighboring counties are growing in sprawl, a type of growth that wastes natural resources and erodes community values. This rate and type of growth will spill into Nevada County, unless our decision makers take responsible action.
6. Nevada County currently experiences some of the worst air quality in the state, as well as problems with sewage disposal, ground water supply and quality and inequitable distribution of water by the Nevada Irrigation District. Increased rates of growth will exacerbate these existing problems.
7. The natural topography of Nevada County imposes a limit on growth. For example, growth must be well planned to minimize the potential destruction from catastrophic wildfire.
8. Current residents value the small town character and rural life-style of Nevada County. This can be protected only by thorough analysis of cumulative impacts of the proposed increases in planned development and of the development already permitted, but not yet built, under the Grass Valley and Nevada County General Plans.
9. Amendments to the General Plans that greatly increase the number of housing units will invalidate the environmental impact analysis done for the County's 1995 General Plan, which was based on a build out population of 150,000 residents. In order that amendments to the General Plan not undermine it's overall housing unit goals, any increases in housing units permitted should be offset by decreases elsewhere in the City or western Nevada County.

Planning Principles

A. TOTAL ALLOWABLE HOUSING BUILDOUT

- Housing units permitted in the annexations and other proposed developments should not exceed the total housing units permitted in the existing City and County General Plans.
- Increases in planned density should only be permitted when offset by actions that would reduce development in other locations within the City or western Nevada County.
- Annexations and developments should not be approved that would stimulate an increase in the historic countywide growth rates.

B. ENVIRONMENTAL IMPACTS:

- New development must not result in significant, unmitigated environmental impacts.

C. PUBLIC PARKS AND OPEN SPACE:

- Annexations and other substantial development must contribute to public parks, open space and trails.
- Contributions of public parks and open spaces must be accompanied by a sustainable maintenance-funding plan.
- Any open space offered should be accessible to the public without fee. Such open space must be offered for recreation or qualify as significant wildlife habitat.

D. PHASING OF ANNEXATIONS AND LARGE PROJECTS:

- Phasing is necessary to ensure that the following public benefits are protected:
 - Historic growth rates are not exceeded.
 - Jobs-to-housing balance goals are met.
 - Public facilities, infrastructure and services are provided at the time of project construction.

E. TRAFFIC:

- Traffic impacts of individual projects must include cumulative impact analysis, including expected build-out under the City and County General Plans.
- Projects must not deteriorate traffic below Level of Service D.
- Projects must not be allowed to degrade the quality of life in existing neighborhoods.
- Needed circulation improvements must be paid for on a fair share basis by each project developer and must be provided concurrent with project construction.
- Additional at-grade intersections on Highway 49 within the Grass Valley sphere of influence are dangerous and must not be allowed.

F. PUBLIC FACILITIES AND SERVICES:

- New development must not cause a reduction in the levels of service of public facilities and services (such as water, sewer, government services, and schools). New development must pay its own way for needed public facilities and services concurrent with project construction.

- Construction of package sewage treatment plants encourages sprawl development outside the community regions of the county, and should not be allowed except to address existing impacts to ground water quality.
- Construction of regional sewage treatment plants encourages sprawl development outside the community regions of the county. The County should not participate in regional sewage treatment planning that would extend sewage infrastructure beyond existing community regions.
- Analysis of water supplies, including both NID and groundwater availability, must be based on drought conditions.

G. HOUSING:

- Cities should approve only the amount of residential development through annexation that will meet the housing need requirements not met by infill development. Residential development beyond this level results in sprawl and does not encourage infill.
- Affordable housing should be provided in individual projects based on City and County Housing Element requirements. A mechanism must be developed to retain permanent affordable housing prior to approving the development.

H. ECONOMY:

- Projects in the annexation areas should not include shopping centers that serve more than the neighborhood demand created by the new housing. This would detract from our existing downtowns and retail centers.
- Phasing of development should ensure that jobs and housing are provided concurrently with the need.

I. SMART GROWTH:

- A project out of scale with the community will not integrate into our small towns and communities regardless of proposed amenities.
- Projects must promote public transportation.
- Development along the Highway 49 corridor south of Grass Valley should be discouraged, since it promotes sprawl into rural areas.
- We support the provision of performance and recreational activity venues; art, theater and music centers; retreats, etc. These types of uses will fulfill an unmet economic need in our community.
- We support provisions for use of alternative energy sources, green building materials, and other measures to ensure energy efficiency.