



CITY OF GRASS VALLEY
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Julie Patterson Hunter
Clerk of the Board
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BOS.PublicComment@nevadacountyca.gov

Subject: PLN23-0059, ORD23-1, GPT23-0001 City of Grass Valley Comments on Amendments to the General Plan and LUDC to Reduce Barriers to Housing Production

Dear Mr. Smith and Ms. Patterson Hunter,

Thank you for the opportunity to comment on the updates the county is proposing to its General Plan and Land Use and Development Code (LUDC) for the purpose of reducing barriers to housing production. I apologize that these comments were not submitted before the planning commission's June 22, 2023 meeting, a time when the city was in a planning staff transition. The City of Grass Valley has three comments, the first two of which have the potential to create conflicts within the city's sphere of influence (SOI) if developed and then annexed, as outlined below:

- 1) Table 1.3 shows a proposed increased density in the "Industrial" General Plan designation from four dwelling units (du) per acre to 6 du per acre for projects proposed within community regions, which includes the city's SOI, with a conditional use permit (Table L-II 2.5.D). However, the city's corresponding "Industrial" general plan designation does not permit residential uses.

The city suggests that residential uses within the SOI be reduced to zero when located in an Industrial designation so that the city can maintain the planned service for these areas as outlined in the city's general plan. The county may consider an increase in density for commercial designations, not to exceed the city's corresponding density limit of 15 du per acre, or increases in the Business Park density, not to exceed the city's corresponding designation of 8 du per acre. Keep in mind that this suggestion maintains the City of

Grass Valley's planned service densities, but I do not know how this might affect the corresponding general plan designations of other jurisdictions' SOIs.

If the proposed densities remain as proposed, the city requests that an asterisk notify developers that there is no guarantee the city can serve above the city's corresponding land use densities.

- 2) Section L-II 2.2.1 and Table L-II 2.2.1.B of the LUDC includes a proposed change to allow duplexes, duets, and four-plexes within the Residential Agriculture (RA), and Single-Family (R1) zoning designations. Since the densities will remain at four du per acre and a minimum 1.5 du per acre for R1 and RA zones, respectively, and these designations correspond to the city's Urban Estate and Urban Low Density general plan designations and corresponding single-family zoning designations, the city does not have a concern about the city's ability to serve these types of developments should they occur in the SOI. However, these multi-family uses would be considered legal, non-conforming if annexed, and as such, would have limits on expansion and rebuilding pursuant to the city's municipal code.

The city suggests that the potential for non-conformance be noted with an asterisk for sites located in the city's SOI.

- 3) A final suggestion is that the county begin to require developers within the city's sphere to design streets to be consistent with city street design standards. This is particularly important when land is developed incrementally and is annexed after partial development in a manner that limits street design refinement, which can in turn limit further development potential due to inadequate street design that requires cost prohibitive improvements or right-of-way acquisition.

The City of Grass Valley requests that you make the changes as suggested above where they have the potential to conflict with the planned development of the city's general plan.

Thank you for your consideration in this matter. If you have any questions, please contact me at 530-274-4711.

Sincerely,



Amy Wolfson
City Planner

CC: Tim Kiser, City Manager