

Planning & Design Commission

Meeting Time: 03-26-26 17:30

eComments Report

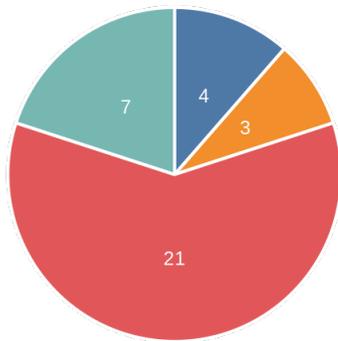
Meetings	Meeting Time	Agenda Items	Comments	Support	Oppose	Neutral
Planning & Design Commission	03-26-26 17:30	18	35	4	3	21

Sentiments for All Meetings

The following graphs display sentiments for comments that have location data. Only locations of users who have commented will be shown.

Overall Sentiment

Support (11%) Oppose (8%) Neutral (60%)
No Response (20%)



Planning & Design Commission

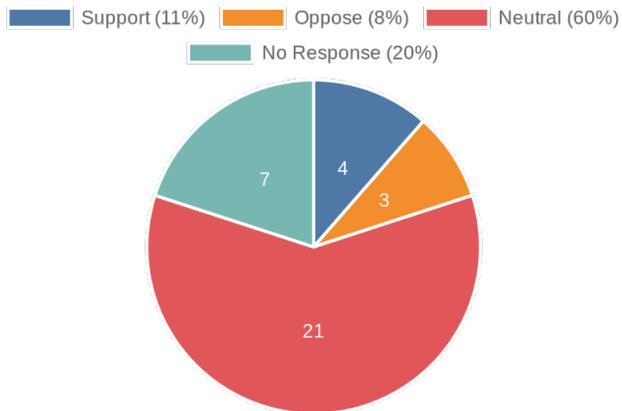
03-26-26 17:30

Agenda Name	Comments	Support	Oppose	Neutral
1. Approval of Planning and Design Commission Minutes File ID: 2026-00142	1	0	0	0
2. Deer Creek Plaza PUD Amendment (P25-020) [Noticed on 03/13/2026; Published 03/13/2026] File ID: 2026-00721	2	0	0	0
3. An Ordinance Amending Various Provisions of Title 17 of the Sacramento City Code Relating to Off-Street Bicycle and Vehicle Parking Requirements (M26-005) [Published 03/06/2026] File ID: 2026-00513	2	0	1	0
4. Workshop: Preliminary Framework for Regulating Cottages on Wheels (LR26-001) File ID: 2026-00399	5	4	0	0
5. 2040 General Plan and Zoning Consistency: Missing Middle Housing (MMH) Standards and Senate Bill (SB) 79 Workshop (LR25-003) File ID: 2026-00672	24	0	2	21
Public Comments-Matters Not on the Agenda	1	0	0	0

Sentiments for All Agenda Items

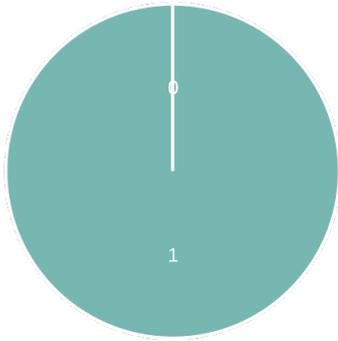
The following graphs display sentiments for comments that have location data. Only locations of users who have commented will be shown.

Overall Sentiment



Overall Sentiment

Support (0%) Oppose (0%) Neutral (0%)
No Response (100%)



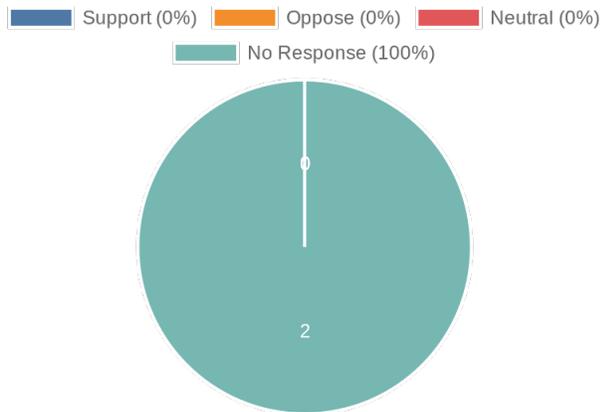
Mark Rodriguez

Location:

Submitted At: 9:14am 03-22-26

Please do not go to Sun Spa, located at 6804 Fruitridge Rd #A Sacramento, CA, 95820, as well as q spa, located at 4215 Norwood avenue, suite #12, sacramento, ca, 95838, They will all claim that they are too busy for you.

Overall Sentiment



Mark Rodriguez

Location:

Submitted At: 9:15am 03-22-26

Please do not go to Sun Spa, located at 6804 Fruitridge Rd #A Sacramento, CA, 95820, as well as q spa, located at 4215 Norwood avenue, suite #12, sacramento, ca, 95838, They will all claim that they are too busy for you.

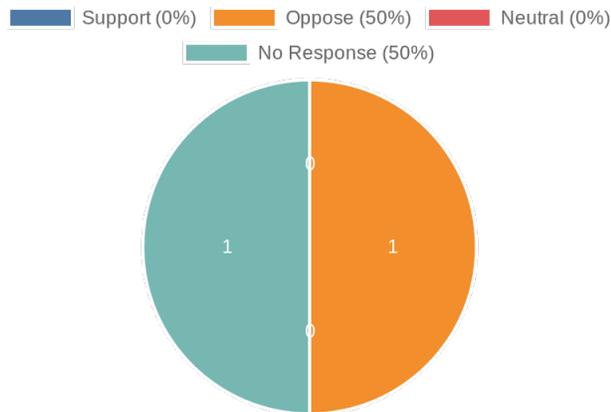
tina hunter

Location:

Submitted At: 10:38pm 03-20-26

What are Multi-unit residentials, is it houses, condo, duplex homes? Is this being considered for low-income or unhoused citizens. Additional residentials will cause more congestion in the Deer Creek home residential area. How many Multi-unit are planning to be built? What is the timeframe of the project from start to finish?

Overall Sentiment



Nae Clemmons

Location:

Submitted At: 3:04am 03-26-26

My name is Nae Clemmons, and I am a resident of SHRA housing at Alder Grove in Sacramento. I am submitting this comment to raise serious concerns about how proposed changes to parking requirements may disproportionately impact low-income residents, particularly those living in public housing.

In my community, parking is not simply a matter of availability. It is a matter of safety. Alder Grove has experienced multiple violent incidents over the years, including shootings in and around the property. Due to these conditions, many residents, including myself, do not feel safe utilizing designated parking areas.

As a result, I rely on street parking in front of my unit for increased visibility and a greater sense of security. However, the implementation of 2-hour parking restrictions has resulted in me receiving three citations within the past year. For low-income residents, these fines create a significant financial hardship.

At the same time, enforcement practices are inconsistent and fail to address the root causes of parking challenges. In another residential community where my mother resides, there are approximately 20 units and 40 parking spaces, yet tenants still struggle to find parking due to long-term inoperable vehicles, unregistered cars, and insufficient enforcement. Issues such as missed garbage collection and overcrowding further limit usable parking space, forcing residents to double park or park wherever space is available out of necessity.

This raises a critical concern: enforcement appears to disproportionately target residents who are attempting to comply and maintain safety, while failing to address systemic misuse of parking resources.

From an equity standpoint, policies that appear neutral on their face can have disparate impacts in practice. Without incorporating safety conditions, enforcement consistency, and the lived realities of public housing residents, this ordinance risks exacerbating existing inequalities.

I urge the City to consider the following before adopting any amendments:
Exemptions or modified parking enforcement for public housing residents
Implementation of residential permit systems tailored to low-income communities
Increased enforcement against abandoned, unregistered, and inoperable vehicles.

A safety assessment of parking areas in communities with documented violence
Coordination between parking enforcement and housing authorities to ensure policies do not penalize residents for unsafe conditions
Parking policy should not be developed in isolation from safety, housing conditions, and equity considerations.
Without these protections, this ordinance risks placing an additional burden on communities that are already disproportionately impacted.

Thank you for your consideration.

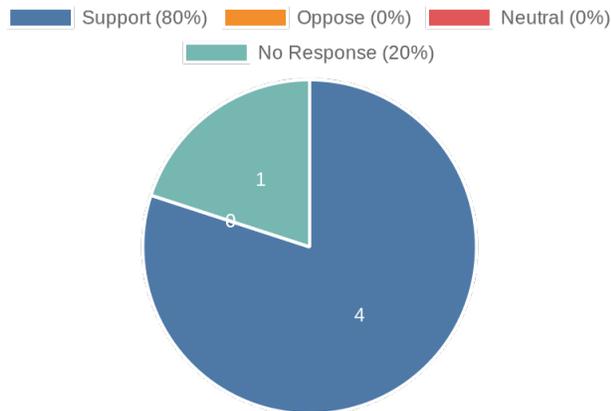
Mark Rodriguez

Location:
Submitted At: 9:16am 03-22-26

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Sacramento, CA, 95820, as well as q spa, located at 4215 Norwood avenue, suite #12, sacramento, ca, 95838,
They will all claim that they are too busy for you.

Agenda Item: eComments for 4. Workshop: Preliminary Framework for Regulating Cottages on Wheels (LR26-001) File ID: 2026-00399

Overall Sentiment



Travis Duckworth

Location:
Submitted At: 5:55pm 03-26-26

I would be happy to answer or comment on our successes, failures, and struggles as well as nuances of what we've done in Nevada County after adopting a similar ordinance last year. -Travis Duckworth (Sol Tiny, Nevada City, 706.202.0449)

Mary Hellwig

Location:

Submitted At: 3:21pm 03-26-26

I love tiny homes and I support House Sacramento's suggestions

Ben Raderstorf

Location:

Submitted At: 8:53pm 03-25-26

My name is Ben Raderstorf, I'm a homeowner in D4. Whenever my family and I stay in vacation rentals, we always look for tiny homes because they're a) so delightful and charming inside and b) tend to be great value (because they're so affordable to build). Almost all of the time, those tiny homes are — in reality — cottages on wheels. All of that would make them great for Sacramento! I strongly support this ordinance as well as House Sacramento's recommendations for how to further strengthen the proposed ordinance.

Varun Arora

Location:

Submitted At: 8:38pm 03-25-26

Please find in this letter House Sacramento's strong support for the preliminary framework for this ordinance, along with a few simple suggestions to make it more effective and help the City meet its housing goals. Thank you!

Mark Rodriguez

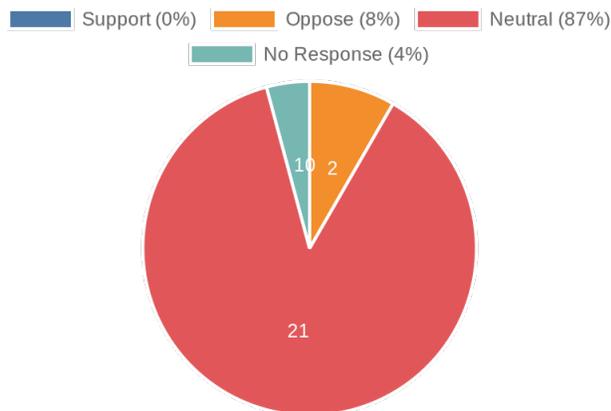
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Agenda Item: eComments for 5. 2040 General Plan and Zoning Consistency: Missing Middle Housing (MMH) Standards and Senate Bill (SB) 79 Workshop (LR25-003) File ID: 2026-00672

Overall Sentiment



Kurt Peng

Location:

Submitted At: 5:23pm 03-26-26

I live in District 4, and I would like more missing middle housing - triplexes, sixplexes, and three-story townhouses - all over Sacramento. These housing typologies can help increase housing supply to reduce rents, enable renting or owning homes at lower cost, and increase density that strengthen the tax base and reduce car dependency, benefiting all Sacramento residents.

To facilitate the production of missing middle housing, I support the elimination of bulk control, which had added 10-20% of the cost of missing middle housing construction, hampering its financial viability. This entails removing existing bulk control rules, and also relaxing the 2.5 story building height limit in the "House Scale Development Standards" to 3 or 4 stories. There is absolutely no reason why we should be unduly restricting the height of our new infill housing during times of a housing shortage that is causing high housing costs and homelessness.

Lastly, I would like for a simplification, or elimination of the four different contexts. I think the "Corridors and Centers" and "Compact and "Connected" contexts can be combined. Even better, we can get rid of the contexts altogether. The entire point of the upzoning was to enable missing middle housing citywide. Let's make that happen.

Troy Wilkinson

Location:

Submitted At: 4:46pm 03-26-26

Legalize simple three-story structures! We can't continue to over complicate and restrict building higher density with our current homelessness and affordability crises!

Mary Hellwig

Location:

Submitted At: 3:20pm 03-26-26

Please legalize simple three-story structures such as three-plexes, six-plexes, and three-story townhomes across the city.

Alex Binck

Location:

Submitted At: 12:44pm 03-26-26

I am a d4 homeowner and I would love to add a story to my house to create an ADU, but the current rules forbid this due to bulk controls. Three stories is a totally reasonable and, frankly, barely noticeable increase in density in a neighborhood that already has many two and even three-story homes. Legalize housing! Ditch bulk controls!

Troy Sankey

Location:

Submitted At: 12:27pm 03-26-26

I appreciate Opticos's work popularizing MMH nationwide, but for Sacramento the proposal is too cautious about 3-story buildings. Stacked triplexes and sixplexes are integral to Sacramento's streetcar suburbs --- hundreds of examples still stand. These are among the most affordable housing types to build. Allowing them again isn't radical.

The good news is that the staff proposal would be much stronger with just some minor tweaks:

1. Raise the "House Scale" height limit from 2.5 to 3.0 stories, matching building types already found throughout Sacramento's older neighborhoods.
2. Simplify the strategies matrix by reducing Context Types from 4 to 3. "Transitional" and "Corridors + Centers" already converge at block-scale FARs but could be merged with minor adjustments at house-scale.
3. Make Context Types additionally sensitive to transit proximity. Low-density areas directly adjacent to current and planned stations should allow a greater degree of change than the same context type elsewhere.

Relaxing bulk controls to enable these smaller, incremental building types is the Strong Towns approach. With

Sacramento facing billions of dollars in deferred infrastructure maintenance, we need neighborhoods that generate enough wealth to sustain themselves.

Wesley Allen

Location:
Submitted At: 11:24am 03-26-26

I am a resident of D2. I oppose "bulk control" rules and to support legalization of simple three-story buildings citywide

Varun Arora

Location:
Submitted At: 10:36am 03-26-26

I am a D3 resident, and homeowner. I read the staff report, and despite all the work put in to making it, I am extremely alarmed, and you should be too. And this is not just about a detail like building form. Let me explain.

CONTEXT TYPES ARE THE NEW REDLINING

Walkability, access to transit, services, and food are fundamental to the quality of living for marginalized people. It is as important as affordable mortgages for wealth building. Once you assume that people living in suburban settings with single family homes love wide lanes and car-dependent living continue to want it that way, like Backstreet Boys suggested, you are ignorantly participating in creating decades more of wealth inequality.

Grocery stores and third spaces open when there is density. Transit routes are created when there is density. Movie theaters, good schools, safer streets, etc. etc. all depend on density. If the goal is to inform building scale on broad stroke context types, you are basically saying "we will limit how dense these areas can be based on how less dense they already are". You might be direct violation of the FHA, and against the underlying intent of the GPU. Building scale is the only way to financially feasibly support density, and support mixed-income living. People on the grid and next to commercial corridors might be from different economic backgrounds, but your proposal keeps them urbansim-rich, while making everyone in "suburbs" urbanism-poor. And that is the new redlining.

You 1000% can meet the *Policy LUP-6.4 Neighborhood Form* goal of neighborhood transitions objectively without needing to segment the entire city crudely in 4 context types. Phasing heights based on abutting structures, and a simple online calculator that determines height you are allowed to go to based on how far you are from transit would do that.

It is also very sad that this Berkeley firm doesn't really understand Sac. Areas identified as "Low-Scale Residential" and "Transitional" are much more diverse and resilient to handle density than they have given any credit to. Such diverse socioeconomic neighborhoods with such different price points developed at such different times all clumped into one big context ("Low-Scale Residential"). FYI, simple objective standards don't require overly simplified analysis. Your recommendation for Block-scale have nuances that House-scale is sorely lacking, and it seems like staff is proposing "Low-Scale Residential" and "Transitional" stick to House-scale.

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Here is a 1 minute video about Sacramento and these context types that will help you arrive at this conclusion:
https://drive.google.com/file/d/1weUzLq3Psksm_7ZMrIEbi-kLa_pfC31u/view

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Were you looking for particular suggestions in my comment? I have so many based on building scale (don't kill 3 stories), penciling developments (don't make small developers' lives impossible by telling them how wide and deep their buildings and "wings" need to be, setbacks are fine), SB 79's influence (apply the heights phasing sentiment across non SB 79 areas too), but I can't even begin to give any here when the basis for the entire analysis is extremely shaky, if not completely broken.

Autumn W

Location:

Submitted At: 10:35am 03-26-26

Overall this looks good, but I do agree that we should not have any form of bulk control. In the short run it may appease some people but in the long run its just going to limit housing and I think a lot of people just are not use to seeing denser housing in their neighborhood and might not realize it actually can have a lot of benefits especially with small scale neighborhood commercial coming. Small business do a lot better when there are more people who live next to it, transit, the only way to improve traffic and parking issues in the long run, becomes more viable, infrastructure can be improved faster because there are more people paying taxes per sqft of infrastructure, less need to destroy farm/wild life lands outside the city for housing.

Aaron Pickett

Location:

Submitted At: 10:18am 03-26-26

Further support for simplifying the design process, don't replace bulk control with bulk control 2.0. Just make housing legal.

Michael Turgeon

Location:

Submitted At: 11:02pm 03-25-26

Please see the attached comment letter from House Sacramento, advocating for simple height and design standards that incentivize the production of Missing Middle housing in all neighborhoods.

Michelle de Sobrino

Location:

Submitted At: 4:26pm 03-25-26

Hi, first time doing something like this. I live in a R-1 zone, in a 47. yr old home, in an established older neighborhood--

Chuckwagon Park sits in the middle of our neighborhood. The small lot/field in question, sits next to it. "TRUSD Workforce

Housing project, has proposed a QSEUDO ,LOW INCOME/SUBSIDZED RENT DEVELPMENT., IN OUR BACKYARDS

Consisting of 10, 3 STORY APT. BUILDINGS, along with other 2 story dwellings, in the MIDDLE OF THE OF OUR NEIGHBORHOOD!! SMACK IN THE MIDDLE!!!! This will impact our daily lives, parking, traffic, which already an issue. PRIVACY.

The infrastructures are 48 yrs, old. Sewer lines/gas lines, roads. 3 story Apt. buildings behind MY HOUSE/BACKYARD will BLOCK SUNLIGHT from Nov. to late Feb/early March due to how low it rises. 3.5 MONTHS OF NO DIRECT SUN TO MY HOUSE/YARD. That is a HUGE INVORMETAL ISSUE, FOR ALL THE HOUSES BEHIND AND NEXT TO THE FIELD.

The neighborhood was also never informed or notified, about this entire project, NEVER!!!! Yet, it's going to IMPACT us the most.

It's a horrible idea, poorly planned, poorly placed. DOES NOT BELONG. **the sunset pic.is a current view from my backyard**

Jeffrey Lu

Location:

Submitted At: 4:01pm 03-25-26

Appreciate city staff's efforts to re-examine our use of bulk controls. Bulk controls are confusing, increase cost, and restrict new and much needed housing. We should move beyond bulk control to clear and simple criteria that allow, at minimum, 3 story buildings anywhere in the city.

Melissa Mourkas

Location:

Submitted At: 1:55pm 03-25-26

I think it will be critical to include the Preservation Commission in this process as it moves forward. If you overlay a map of the city's historic districts on the Draft Map of Parcels affected by SB 79 (p. 32 of the Staff Powerpoint) , you will see a strong correlation to historic resources. The negative impacts to historic resources and districts

could be significant. This must be considered as part of this process and I see no mention of historic resources or districts in any of the staff materials provided.

Brandon Mettler

Location:

Submitted At: 6:53pm 03-24-26

I am a Land Park resident and we need more apartments in my neighborhood. I echo the sentiments of most on here. Please just get rid of bulk control and do not replace it with bulk control 2.0. I support legalizing simple three-story buildings in my neighborhood and every neighborhood.

Steven Rosen

Location:

Submitted At: 6:48pm 03-24-26

I agree with the House Sacramento position.

Apartments are nice. We need more apartments in our neighborhoods. It is good when apartments look like apartments and silly to make them wear single-unit disguises.

To force apartment buildings to wear a disguise is to tell the families who are living in them that they are shameful and should be hidden away to suit the preferences of monoplex snobs. I disagree.

Laws that prevent people from building apartments are why we have a housing shortage. The last 18 months showed that rules like bulk control and this new imitation bulk control prevent people from building apartments.

Our unhistoric old houses are falling apart. They are starting to cost more to repair than they are worth. Whether or not it pencils to build an apartment building will decide whether these old houses will be replaced with the beautiful apartment buildings we need or unaffordable luxury single-unit dwellings.

Remove the silly apartment disguise rule so we can have some more apartments in our neighborhoods, please.

Our families need places to live, and Sacramentans will walk taller when we have and live in small apartment buildings that are proud to look like what they are.

John Hodgson

Location:

Submitted At: 2:20pm 03-24-26

Planning & Design Commission Members,

I am concerned that some of the additional regulations being proposed for Missing Middle Housing may be counterproductive. Small-scale infill projects such as duplexes, triplexes, fourplexes, and cottage housing are typically built by small developers and property owners, and these projects are very sensitive to cost, time, and regulatory complexity.

As several housing policy experts have noted, the biggest barrier to housing production is often not zoning density, but approval process, uncertainty, and cost. If projects become more complicated, take longer to approve, or require additional discretionary review or design requirements, many of these small projects simply will not be built.

If the goal is to encourage missing middle housing, the City should focus on making these projects simpler, more predictable, and easier to approve, rather than adding additional regulations. I would encourage the City to meet with those who are actually trying to build missing middle housing and get their input. It could be very enlightening.

Thank you for your consideration.

John Hodgson

Brian Schmitt

Location:

Submitted At: 12:56pm 03-24-26

My name is Brian Schmitt. I'm a D4 resident, father, and homeowner. I participated in most of the Small Developer Incubator events hosted by the city's planning team, including the recent boot camp with the Incremental Development Alliance. As a result, I've invested many hours studying the Missing Middle Interim Ordinance and trying to make a variety of projects pencil. The setbacks and bulk control of the Interim Ordinance are already quite complicated. I reviewed the suggestions from Opticos regarding House-scale and Upper MMH and find these to be even more complicated and restrictive. I advocate for simple 3-story buildings to allowed across the city. Right now, there is a real disconnect between the housing goals of the city and what can actually pencil and get built.

Nolan Gray

Location:

Submitted At: 11:24am 03-24-26

My name is Nolan Gray. I'm an AICP planner, D4 resident, and renter. Sacramento made history by legalizing "missing middle" citywide, but we have unfortunately fumbled this progress by imposing unworkable bulk standards. Please just get rid of bulk control and do not replace it with bulk control 2.0. Polling data consistently finds that the cost of living is the number one issue facing Sacramento residents. Planners and policymakers should be relentlessly focused on expanding the range of housing options in our city, and not allow progress on kitchen table issues to be undermined the arcane massing mandates or fears over hypothetical projects that offend the aesthetic sensibilities of a noisy, privileged minority. Sacramento remains California's most affordable major city in part because of past efforts by planners and policymakers to simplify permitting processes, liberalize zoning, and allow for a range of housing types in all neighborhoods. Let's keep the California Dream alive, continue this tradition, and get the most out of our missing middle ordinance. Thank you.

Connor Finney

Location:

Submitted At: 10:44am 03-24-26

My name is Connor Finney. I am a D4 resident and a renter. Though I am supportive of the Missing Middle Ordinance in concept the proposed revisions are too complicated, arbitrary and will add to costs of projects for no real benefit. Please eliminate bulk control requirements citywide, eliminate expensive open space and setback requirements, and treat all neighborhoods the same.

We tried bespoke development standards already when the interim ordinance was implemented and the result has been few developments have been built. We should learn from this experience and ensure that the missing middle zoning ordinance is simple and focuses on outcomes as opposed to abstract, confusing design preferences.

Don Gibson

Location:

Submitted At: 10:13am 03-24-26

Hi, I am Don Gibson, a homeowner and resident of district 3. Sacramento faces a critical housing crisis and I do believe we need to continue to include bulk controls new homes and apartments. They prevent more homes from being built.

Simple is better and we should not over complicate building new homes. Please don't include any bulk controls or similar restrictions.

Jenny Mital

Location:

Submitted At: 9:50am 03-24-26

Please just get rid of bulk control and do not replace it with bulk control 2.0. I support legalizing simple three-story buildings in my neighborhood and every neighborhood.

Ansel Lundberg

Location:

Submitted At: 9:27pm 03-23-26

My name is Ansel Lundberg. I am a House Sacramento member, homeowner, and father in District 7 (in Curtis Park in the proposed designated “compact + connected” part of the city). I bike or ride SacRT blue line light rail with my son to get him to childcare in downtown Sac. I am a House Sac member. I think the draft SB 79 local implementation ordinance as proposed looks great. It is in the spirit of state law.

Regarding the zoning code changes to comply with the 2040 general plan outside of SB 79 areas (MMH): it is too complicated. The key to the 2040 GP since the beginning has been to simplify land use regulations to make it easier to meet or exceed our state and city housing goals. The production numbers post-2024 MMH implementation ordinance don’t lie: bulk control is too restrictive. There is no way to paper over this with complex schema and designations: we decided in the 2040 GP to transform our city for the better in order to end homelessness. Please simplify and ensure three full stories are allowed across the city.

Ben Raderstorf

Location:

Submitted At: 9:12am 03-23-26

Please just get rid of bulk control and do not replace it with bulk control 2.0. I support legalizing simple three-story buildings in my neighborhood and every neighborhood.

Mark Rodriguez

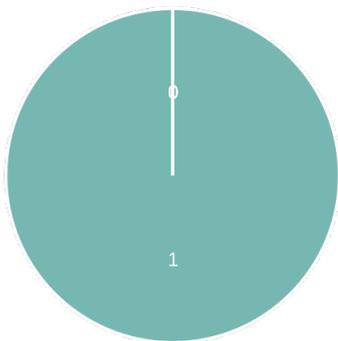
Location:

Submitted At: 9:17am 03-22-26

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Agenda Item: eComments for Public Comments-Matters Not on the Agenda

Overall Sentiment



Mark Rodriguez

Location:

Submitted At: 9:18am 03-22-26

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Sacramento, CA, 95820, as well as q spa, located at 4215 Norwood avenue, suite #12, sacramento, ca, 95838,

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March 25, 2026

City of Sacramento Planning and Design Commission
915 I Street
Sacramento, CA 95814

RE: Workshop: Preliminary Framework for Regulating Cottages on Wheels (LR26-001), File ID: 2026-00399

Dear Chair and Members of the Planning and Design Commission,

House Sacramento writes in strong support of the City's proposed framework for regulating Cottages on Wheels (COWs). We commend City staff for advancing Housing Element Program H23 and for developing a thoughtful preliminary ordinance that will expand housing options for Sacramento residents. This initiative is a natural complement to the City's landmark Missing Middle Housing Ordinance and continues Sacramento's leadership as a national model for bold, inclusive housing policy.

COWs represent an affordable, flexible, and low-impact housing type that can help the City meet its Regional Housing Needs Allocation, advance fair housing goals, and provide attainable housing options for seniors, young adults, family members, and others who need smaller-scale living arrangements. The proposed framework is well-grounded in the 2040 General Plan's vision for a variety of housing types (Goal LUP-6) and the Housing Element's commitment to expanding housing choices throughout the city.

While we are enthusiastic about this initiative and support the general direction of the draft framework, we respectfully offer the following feedback to strengthen the ordinance and maximize its impact:

1. Allow More Than One COW Per Lot. The draft framework proposes a limit of one COW per lot. We believe this restriction is unnecessarily conservative and will limit the ordinance's ability to meaningfully contribute to housing production. Many residential lots in Sacramento—particularly larger lots in the R-1 and R-2 zones—can accommodate more than one small accessory dwelling without adverse impacts on neighborhood character or infrastructure. We encourage the City to consider allowing at least two COWs per lot, or tying the number of permitted COWs to lot size, similar to how the MMH Ordinance scales allowable floor area. Peer jurisdictions like Placer

County already allow community-scale configurations of up to 12 units. A more flexible approach would better serve the City's housing production goals.

2. Streamline Permitting Through Ministerial Approval. The proposed Site Plan and Design Review (SPDR) process adds unnecessary time, cost, and uncertainty to what should be a straightforward housing type. COWs are factory-built, third-party certified units that arrive on-site already meeting ANSI 119.5 and NFPA 1192 standards. Requiring discretionary review—including the potential for a noticed public hearing for deviations—is disproportionate to the scale and impact of these small dwelling units. We strongly recommend a ministerial, over-the-counter permitting pathway for COWs that meet the ordinance's objective standards, with building permits required only for utility connections. This approach would be consistent with the streamlined permitting the City has embraced for ADUs and would reduce barriers to adoption, particularly for lower-income homeowners who stand to benefit most from this housing type.

3. Reconsider Overly Restrictive Appearance and Design Standards. We appreciate the goal of ensuring COWs are compatible with residential neighborhoods, but the current design requirements risk being overly prescriptive in ways that increase costs and discourage adoption. Requiring that COWs "must resemble a house," include specific roof pitches, and use "commonly used materials found in the neighborhood" introduces subjective criteria that can be difficult for applicants to satisfy and for staff to administer consistently. These standards could also inadvertently exclude well-designed, high-quality manufactured tiny homes that use modern or non-traditional materials. We recommend that the City adopt clear, objective design standards focused on health, safety, and basic neighborhood compatibility—such as screening wheels and mechanical equipment—without imposing aesthetic preferences that drive up costs or create barriers to entry. The requirement to screen wheels and equipment is reasonable, but standards beyond that should be minimal and objective.

4. Implement a Pre-Approval and Re-Approval Program for Manufacturer Designs. To further enhance predictability and efficiency, the City should develop a catalogue of pre-approved COW designs from manufacturers whose products meet the ordinance's technical and safety specifications. Similar to the City's successful "Shelf-Ready" ADU program, units utilizing these pre-verified designs should be eligible to bypass the Site Plan and Design Review process. Furthermore, for new products that the City has reviewed in the past, a "re-approval" status should be established to streamline the experience for subsequent applicants. This approach significantly reduces the time and cost for homeowners while eliminating the opportunity for inequitable, subjective decisions during the application process.

5. Permit COWs on Vacant Lots as Primary Dwellings. The current requirement that a COW be placed only on lots already developed with one or more dwellings creates an unnecessary hurdle for those seeking attainable homeownership. By allowing COWs on small lots (e.g., 1,200 sq. ft.) as primary dwellings, the City can leverage the opportunities created by SB 684 and SB 1123 to provide "starter home" pathways for residents. This will also help reduce vacancy on empty lots because it is much easier to make a COW-as-a-primary-dwelling pencil as a housing development, and consequently this will lower the pressure on the City staff for vacancy monitoring and

enforcement. To address infrastructure and utility costs, the City may consider charging impact fees for these standalone units that are proportional to the modest scale of the COW, ensuring they contribute fairly to the city's growth without making the projects financially infeasible.

6. Formally Classify Cottages on Wheels as “Movable ADUs.” We recommend that the City explicitly define COWs as “Movable ADUs” within the ordinance and eventually in the Title 17 code. This classification is vital for protecting homeowners in developments governed by Homeowners’ Associations (HOAs). By defining a Cottage on Wheels as a specific type of ADU, the City triggers the protections of California’s state ADU laws, which prohibit HOAs from banning such units through restrictive CC&Rs. Without this clear legal classification, HOA prohibitions on “structures on wheels” or “temporary dwellings” could effectively prevent many Sacramento residents from utilizing this important new housing option.

We also encourage the City to consider the following as the ordinance is refined: exploring allowances for COWs in additional zones beyond R-1 through R-2, particularly in multi-unit and mixed-use zones where density is already anticipated; ensuring the ordinance does not count COWs against a property’s ADU allowance under state law, preserving the ability of homeowners to build both; and establishing a clear, affordable fee structure that reflects the modest scale of these units.

Sacramento has an opportunity to once again lead the state by creating a practical, accessible pathway for Cottages on Wheels. We urge the Commission and staff to adopt a framework that prioritizes simplicity, affordability, and housing production—consistent with the bold vision that has defined Sacramento’s recent housing policy achievements.

Thank you for your consideration and for your continued commitment to expanding housing opportunity in Sacramento. We look forward to continued engagement as this ordinance moves forward through the Housing Policy Working Group and adoption hearings.

Sincerely,

Varun Arora
Board Member
House Sacramento
www.housesac.org



March 26, 2026

Planning and Design Commission
City of Sacramento
915 I Street Sacramento, CA 95814
Sent via eComment and email

RE: 2040 General Plan & Zoning Consistency: Missing Middle Housing (MMH) Standards and Senate Bill (SB) 79 Workshop

Dear Planning and Design Commissioners,

On behalf of the 300+ members of House Sacramento — an all-volunteer, grassroots organization dedicated to ending our housing crisis — I am writing with, on one hand, enthusiasm, and on the other, significant concerns about the staff report with concepts and recommendations for turning the Missing Middle Interim Ordinance into permanent zoning code.

First, **we strongly support making the Missing Middle Interim Ordinance permanent** and applaud staff for the work that has gone into this process. Sacramento made history as the first city in the country to move entirely to a form-based code and legalize multifamily everywhere. We are proud of this city's leadership and want to see it succeed.

However, **the data in the staff report makes clear that the current ordinance is not delivering the housing production the City hoped for.** Just 19 projects have been approved under the interim ordinance, averaging only 3 units each. At this rate, this program would take approximately 350 years to meet our 2030 RHNA targets. Further, these projects have been concentrated on the Grid and in Oak Park, neighborhoods that already had small multifamily housing. The interim ordinance has not yet opened up the rest of the city to the benefits of more housing types.

The lesson here is clear: **instead of going backwards and adding complexity, we should keep simplifying and remove the complications in the existing law that are preventing projects from getting built.**

To that end, we are pleased to see that staff is proposing to remove the existing Bulk Control Standards, which House Sacramento has consistently identified as the single greatest obstacle to Missing Middle production. We have heard directly from prospective developers that bulk control adds 10–20% to project costs and makes it impossible to build simple stacked three-plexes, six-plexes, and three-story townhomes — the workhorses of Missing Middle housing.

At the same time, **we are deeply concerned that the proposed “House Scale Development Standards” are simply bulk control by another name, and we ask the Commission not to adopt them.**

These new standards would limit Missing Middle projects to 2.5 stories, with a third story permitted only as an “attic story” with dormers. In practice, this means Missing Middle housing

will remain *de facto* limited to two stories, not three. While the new standard is at least simpler than the old bulk control envelope, it could actually be more harmful on larger lots, like those in Northgate or South Sacramento, where the original bulk control was less of an obstacle.

Our concerns with these “House Scale Development Standards” echo those we raised about bulk control in September 2024 and remain as urgent today:

1. **This will continue to make projects more expensive, which will increase housing costs and decrease housing supply.** The most efficient and lowest-cost way to build small multifamily is simple frame buildings with standardized, stackable unit floor plans. Requiring dormered attic stories instead of simple third floors means many potential projects will only pencil-out at two stories. Market-rate projects like 1221 C Street in Mansion Flats (outside the reach of the current bulk control standard) reaches three full stories while demonstrating the power of simplicity: 22 infill apartments across two former single-family lots, currently renting at just \$1,408/month — roughly affordable at 65% of AMI — and even accepting SHRA housing choice vouchers. These homes are affordable precisely because their physical structure is simple: stacks of identical floor plans, not bespoke units carved out of a Craftsman simulacrum.
2. **Three story buildings are cost-effective solutions to the housing crisis.** Because the State Building Code mandates a second stairway after a project reaches four floors, three story buildings are often the sweet spot in terms of cost per unit. Limiting viability for that third floor mechanically limits the range of Missing Middle projects that will pencil out on FAR 1.0 or 2.0 lots, which means (almost definitionally) that we will see fewer units built, and that the units we do get will be offered at higher rents than 1221 C. Adopting the House Scale standard would directly detract from affordability, and the City should recognize that doing so is deliberately raising rents in service of some other priority.
3. **The rationale for the House Scale standard is still purely aesthetic and rooted in regressive “neighborhood character” concerns, which is not worth the tradeoffs.** Like the original bulk control, the House Scale standard is designed to ensure that apartment buildings don’t look like apartment buildings. We are in a housing and climate crisis, with very ambitious housing production and VMT reduction goals that we are far from meeting. Consequential policies must have a stronger rationale than appearance alone, or vague concerns about privacy and impacts on the surrounding neighborhood. There are neighborhoods in Sacramento where three story buildings have been built next to shorter single-family homes, and we all manage to coexist peacefully. Three story buildings do not cause problems, and the City will not reach its goals without easing restrictions on an incremental increase in height and density in established neighborhoods.
4. **The fear of backlash is overblown.** Sacramento’s electorate is militantly pro-housing. The Planning and Design Commission gave unanimous approval to a six-story, 332-unit apartment building across from single-family homes in East Sacramento just last month, and the project hearing and comment docket drew far more supporters than detractors (including the East Sacramento Community Association). If a 332-unit building in one of our wealthiest neighborhoods is politically palatable, then surely simple three-story six-plexes would also meet the mark. More importantly, no changes we could contemplate in this zoning code update would release a torrent of development or “transform” the city anytime soon. The economics of building housing are challenging, and neighborhood change is always more incremental than planners fear.

5. **It is not clear whether the House Scale standard would apply in SB 79 zones.** SB 79 explicitly allows heights of up to 55-85 feet depending on distance from an eligible transit stop, while the House Scale concept envisions heights of “typically 2.5 stories max; 24’ max. to top of highest eave.” This is an explicit, rather than *de facto*, limit on building height in Missing Middle zones that overlap with SB 79 eligibility, and thus appears inconsistent with a plain reading of the legislative text. Clarifying this interaction in the actual zoning code text, or in City guidance, is critical to provide the certainty needed for developers to proceed with the heights they are entitled to under SB 79.
6. **The overall proposal is far too complicated.** Sacramento became the first city in the country to adopt a form-based code in the name of simplification. Streamline Sacramento is a signature initiative championed by the Mayor to simplify the development process and demonstrate that the lofty vision put forth in the General Plan wasn’t all talk. Yet the staff report proposes a byzantine matrix of four different “context” maps, three Missing Middle “typologies,” and three different “degrees of change,” nested within multiple “development outcomes” and FAR targets. This complexity is antithetical to supporting housing production. Every layer of complication is another reason a small developer decides to do something else with their time and limited capital.

If the Commission feels it must gesture toward development patterns of the past and hedge against concern over three-story buildings, there are far less damaging alternatives than blanket House Scale standards in Missing Middle zones. For example: exclude the standard from FAR 2.0 zones; raise the “highest eaves” height to approximately 28–30 feet, which would still allow the shortest possible code-compliant three-story buildings but not at the full 35 feet; waive the House Scale standard for lots adjacent to existing two- or three-story buildings; or, limit the standard to lots below a certain size. Any of these would be preferable to a blanket restriction that effectively bans the most affordable form of Missing Middle housing.

We also want to highlight several elements of the staff report that we support:

Width and depth standards instead of setbacks, open space, and lot coverage. Simpler is better. Width and depth is simpler than the current combination of setbacks, open space, and lot coverage. We support this change.

A “Block Scale” Missing Middle category for 4–5 story buildings. This is a great idea, and could be what’s needed to unlock Missing Middle projects in higher-land-cost areas. However, everything depends on where the City applies these more generous standards.

We urge the Commission to apply Block Scale standards broadly — to both “Compact + Connected” and “Transitional” zones at a minimum. Together these two maps include all seven council districts, a strong combination of higher- and lower-resource neighborhoods, and all of the transit- and amenity-rich areas where Missing Middle is most likely to actually get built. If the city applies Block Scale *only* to “Compact + Connected” neighborhoods — places like the Grid, Oak Park, Old North Sacramento, Northgate, and Del Paso Heights — it will risk perpetuating the exclusionary planning decisions of the past. These neighborhoods are only “Compact + Connected” because past generations of planners deliberately concentrated higher-density housing there while shielding places like Land Park and the Fab 40s from people seen as undesirable. We should not repeat this pattern. Rather, the Missing Middle ordinance should be designed to open up new housing opportunities and build more inclusive communities.

Finally, incorporating SB 79 height limits directly into the local zoning code. This is exactly right. Incorporating State height limits into the local code means that small, inexperienced

developers without seasoned attorneys don't have to wade through legislation and case law to know what they're allowed to build. It should be a point of pride in Sacramento that no one ever needs to invoke state law to preempt local rules.

Again, we remain deeply impressed and supportive of the City's bold vision and steadfast commitment to eliminating exclusionary zoning and ending our housing crisis, which was exacerbated by decades of inaction and fear of change. And despite our best efforts thus far, we remain in a deep housing shortage and far too many of our neighbors lack safe and stable housing of any kind. We simply ask that the Commission look past residual aesthetic anxieties that prevent this landmark ordinance from actually producing the Missing Middle housing that we so desperately need.

Please do not just replace bulk control with the House Scale standard. We support legalizing simple three-story buildings in every neighborhood and wish to engage with the City on finding a workable path to that vision.

In gratitude for your leadership,

Michael Turgeon
President
House Sacramento
www.housesac.org

Twin Rivers Unified School District Proposed Workforce Housing Project – Chuckwagon
(low income / subsidized rents)



Proposed

Existing Neighbors

The TRUSD proposal is for 10 three-story structures similar to the picture on the left and 8 two-story structures of similar design. These structures of a different design than existing neighbors will be significantly taller than the existing structures in the neighborhood. It appears the property being developed has a higher elevation than surrounding neighbors, which makes the situation worse. Some of the three-story structures are only a few feet from single and two-story houses located on Old West and Stampede. The homes on Old West and Stampede will have a significant loss of privacy.

