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Community Development  
Permit Center/Building Division

November 8, 2018

City of Stockton Planning Commission  
City of Stockton  
425 North El Dorado Street, City Hall  
Stockton, CA 95202

Re: Envision Stockton 2040 General Plan Update

Dear Honorable Members of the Stockton Planning Commission:

Thank you for the opportunity to participate in the Envision Stockton 2040 General Plan Update. This has been an informative and important process and I applaud the City for pursuing a plan and policies that champion job and educational growth for its residents. As the Update now winds its way to a conclusion, I felt it important to correct the record as it relates to our Eight Mile Road property.

One, it has been reported that "Spanos" owns "3,800 acres of prime ag land" north of Eight Mile Road. Factually, this is wrong. Spanos - more correctly Trinity Capital LLC and Spanos Corporation - owns approximately 900 acres north of Eight Mile Road. Notably, this land has been earmarked for development since 2004.

Two, it has also been reported that as many as 26,710 housing units are planned for the "Spanos land". Again, factually this is wrong. After carefully listening to feedback from the community, our local legislator, and city staff, we recalibrated its development plans and crafted a plan for our Eight Mile Road properties that focuses on job creation rather than housing. For instance, we have set aside land for a 4-year university, a separate innovation campus, a jobs training and employment center, and a community hospital and health care center. In addition, after meeting with potential tenants we learned that nearby housing positively influences locational decisions. Thus, we acknowledge that new housing must complement job centers. We also recognize the type of housing to be built will be guided primarily by city policies and secondarily by market conditions. This approach is consistent with the City Council's goals for the property north of Eight Mile Road.

Three, the land north of Eight Mile Road has been earmarked for development since the late 1990s and was specifically included in the Sphere of Influence ("SOI") in 2004. (A sphere of influence represents a decision that land is planned to be annexed and developed within the City of Stockton.) Significantly, after the Sierra Club challenged this designation, they entered into a negotiated settlement and agreed

to dismiss their lawsuits "with prejudice". Therefore, as a party to the negotiated settlement, the Sierra Club is prevented from challenging the validity of the Sphere of Influence.

Four, the development projections and assumptions used to evaluate the impacts of developing north of Eight Mile Road are significantly flawed. The draft Environmental Impact Report ("DEIR"), table 3-3, 2040 Development by Study Area, proposes that development north of Eight Mile Road will be largely residential. This is wholly inconsistent with the land-use designation of an Employment and Education Enterprise Zone and fails to be responsive to the Council's expressed vision for this study area. As a side note, we were not consulted on our proposed development plans for our Eight Mile Road property and this omission may have contributed to the inaccuracies presented in the table and analysis.

Our vision for the Eight Mile Road properties is transformative in terms of economic development and employment opportunities. We envision a project that would marry together economic, environmental, and social sustainability. It is a project that strikes a balance between jobs, education and housing, transforming the city from a car-centric commuter community to a hub of economic and educational opportunities.

The General Plan Update is an important next step in Stockton's economic recovery. We believe a General Plan that defines policies encouraging job growth, job diversity and prosperity, and expanded educational opportunities will send a clear signal that Stockton is the right location and has the right vision for the State's next 4-year university and a city which is strongly supportive of growing companies that create family wage jobs and widespread economic opportunities.

Thank you for your consideration of our comments.

Sincerely,



David Nelson  
AG Spanos Companies

Cc: Kurt Wilson  
David Kwong  
John Leubberke