



May 26, 2010

Mr. David Bryant
Project Planner
Tulare County Resource Management Agency
5961 South Mooney Boulevard
Visalia, CA 93277

Re: Tulare County General Plan Update and
Recirculated Draft Environmental Impact Report

Dear Mr. Bryant:

Please accept and consider these comments from American Farmland Trust (AFT) on the revised Tulare County General Plan Update (GPU) and Recirculated Draft Environmental Impact Report (RDEIR).

Background information on AFT and its interest in the Tulare GPU can be found in our previous comments submitted to the County on February 14, 2007. Rather than repeat those comments, we attach them and incorporate them by reference in this document. We would add the following points for amplification.

The main shortcoming of the updated GPU remains that it would tolerate, if not encourage, widely scattered development at what appears to be very low densities, thus wasting farmland, other resources and tax dollars. This is the antithesis of the kind of smart, efficient planning for growth that communities around California and the United States are embracing as the key to economic opportunity, environmental sustainability and the protection of the resource on which America's food supply depends.

The GPU would permit development in 41 separately identified places around the county, as well as in ill-defined transportation corridors and unspecified new towns. As much as a quarter of new development would be welcomed outside existing cities. The rationale for this seems to be a desire to create economic opportunity for every community within the county.

While we wholeheartedly support this goal, we question whether widely dispersing development would achieve it. It could actually dilute the economic impact of new growth in the County and reduce the opportunity of any given community to capitalize on it. Further, the higher costs associated with creating widely-spread demand for

public services¹ could render communities less able to afford them and make them less attractive to new business.

The GPU would also permit and encourage development at very low densities. Neither document explicitly quantifies the build-out density implied by the GPU. But we calculate that the average build-out density under the GPU would be only 5.3 people per acre, lower than the current development trend in Tulare County of 5.7 people per acre, which in turn is only 70% of the San Joaquin Valley average of 8.1 people per acre.² If we assume that roughly three-quarters of the build-out area will be residential,³ the net housing density would be 6.9 people per acre, which at 3 people per household translates into roughly 2.3 dwellings per acre. In other words, housing lots would average just under a half-acre – over the entire county.

This astonishing conclusion raises a question about whether, in fact, Tulare County needs more than 59,000 acres of farmland to accommodate anticipated growth out to the year 2030. If the average residential density were increased to the San Joaquin Valley average of 8.1 people per acre, 6,715 acres or 15% of the farmland that would be lost to urbanization could be conserved. If average residential density were increased to 12 people per acre – the prevailing trend in Stanislaus County, which has the highest development efficiency in the San Joaquin Valley – 19,300 acres or 42% of the farmland that the RDEIR assumes will be lost could be saved.⁴ Almost three-quarters of this land would be prime farmland. (GPU, Table 3.10-9) In view of this, consideration should, thus be given to reducing the size of many of the CACUDB, HDB and CACUABs.

The GPU proposes a series of new mitigation measures to reduce the impact of planned development on farmland. They include agricultural conservation easements (AG-1.6, AG-1.18, Ag Element Implementation Measure (AEIM) #15), a comprehensive mitigation program (AEIM #1), a review of agricultural land preservation programs (AEIM #2) and, most significantly, a cooperative effort by TCAG and LAFCO to monitor farmland conversion and development efficiency

¹ See, e.g., *Alternatives for Future Urban Growth in California's Central Valley: The Bottom Line for Agriculture and Taxpayers* (American Farmland Trust, 1995), finding that the higher public service costs associated with low density development (3.5 DU per acre) would result in a collective budget deficit for cities in the region.

² The RDEIR assumes that the designated growth areas, totaling 59,435 acres, will be fully built out by the 2030 planning horizon of the GPU. (GPU, Table 3.10-9). The projected population increase that will be accommodated within them is 313,970. (RDEIR, 2-24). Dividing the population by acreage yields an average of 5.3 people per acre. The current trend (2000-2008) is derived from the following figures: The population of Tulare County grew 53,715 from 368,628 to 422,343 (U.S. Census estimate), while the area of urban and built-up land grew by 9,448 acres during the same period (CA Dept of Conservation, Farmland Mapping & Monitoring Program), yielding an average of 5.7 people per acre. Comparable figures for the San Joaquin Valley were derived from the same sources.

³ The preferred growth scenario submitted by TCAG to the San Joaquin Blueprint assumed 76 percent residential.

⁴ Another way to look at this is that it would extend the capacity of the existing 59,435 acres within designated growth areas out to the year 2057, without any change in commercial FARs that could achieve further savings. It also bears noting that, even at the Stanislaus density, housing lots would average one quarter acre – hardly a “high rise” growth scenario.

(density) and to produce a report that documents the number of people per developed acre in each designated growth area (AEIM #7).⁵

These mitigation measures are praiseworthy. AFT not only supports them, but would be glad to work with County officials and other stakeholders to implement them. However, as we document above, none of them would mitigate farmland loss as effectively as simply reducing the average size of residential lots contemplated by the GPU. Thus, we disagree with the conclusion of the GPU that there are “no additional technologically or economically feasible mitigation measures are currently available to reduce this impact [on farmland] to a less than significant level.” (GPU 3.0-16)

Indeed, Alternative 5, the so-called “confined growth” option,⁶ “would require greater land use efficiency standards for development on important farmlands and promote increased densities and mixed use areas within developed areas.” (RDEIR, 3.10-15, 16) The RDEIR concludes that this is the “environmentally superior alternative.” As suggested above, we submit that it is also likely to be the economically superior alternative as well as the one that best serves the county’s agriculture industry. AFT supports the adoption of this alternative or, at a minimum, the incorporation of development efficiency standards into whatever GPU option is selected.

In conclusion, we would like to point out that Tulare County’s neighbors – Fresno, Kings and Kern Counties – all seem to have embraced the idea of smarter, more efficient growth, judging from their preferred Blueprint scenarios and the land use-related greenhouse gas reduction targets recently submitted under SB 375. They apparently believe that true economic opportunity rests upon conserving, rather than wasting both resources and taxpayer dollars. If Tulare hopes to compete with them for new businesses that will help diversify the local economy, can it alone afford to adopt a GPU that ignores smart growth principles?

All of these comments are offered in a spirit of cooperation. We will be glad to discuss any of them and to collaborate with the County in responding to them.

Respectfully,



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⁵ The development efficiency study comes close to the development efficiency benchmark system that AFT recommended in its earlier comments on the GPU. The difference is that a study would simply document the waste of farmland after-the-fact, rather than prevent it by evaluating development proposals against minimum efficiency standards.

⁶ This terminology is not only misleading, it appears to be deliberately calculated to cast this alternative in a negative light. A more appropriate label might be the “controlled” growth scenario, in contrast to what is arguably the uncontrolled growth scenario contemplated by the proposed project GPU. As a practical matter, there isn’t much difference between them in terms of where growth would occur. The controlled scenario would accommodate 26% of population growth outside Tulare cities, while the proposed project scenario would accommodate 30%.



Comments and Recommendations
on the Proposed Tulare County General Plan Update
February 14, 2007

The proposed Tulare County general plan update (GPU) was released to the public in November 2006 as a draft *Goals and Policies Report* (GPR). The deadline for public comment is February 14, 2007.

American Farmland Trust deeply appreciates the opportunity to submit comments on the proposed general plan update. We have the utmost respect for local land use decision making, and have consulted farmers, officials and others in Tulare County as we prepared these comments. We hope and trust that they will be received in the same spirit of cooperation as they are offered. We would be glad to discuss them with County planners and elected officials at any time.

Summary

Tulare County is developing more land per new resident than any other county in the Central Valley. At the current rate, its urban area will almost double in size by 2025. Most of the 40 cities, communities and hamlets in the county – all of which are slated to grow under the proposed general plan update – are located in the midst of productive farmland. Thus, the only effective way for the county and its cities to conserve a meaningful amount of farmland is to improve the efficiency of development. The proposed general plan update includes many policies aimed at minimizing the conversion of farmland, but none directly addresses the critical issue of per capita land consumption. AFT proposes that the County adopt an explicit policy of measuring, tracking, publicizing and reducing per capita land consumption and pledges to work with County officials to implement it.

American Farmland Trust and Its Interest in the Tulare GPU

AFT is a national nonprofit organization founded in 1980 to protect the best farmland from conversion to other uses and to help farmers adopt agricultural practices that will improve environmental quality. It is widely acknowledged to be the nation's most authoritative source of information and expertise about farmland protection policies. We have had an office in California since 1983 and have made the Central Valley the focus of our efforts in the state ever since an AFT research report *Farming on the Edge* (1993) concluded that the region was – as it still is – the most productive agricultural area in America under the most severe urban growth pressure. As the second highest grossing agricultural county in the Valley – indeed, in the United States – Tulare is among the jurisdictions that AFT is most interested in helping to conserve the farmland that is the basis of its economy.

In 1995, AFT completed another research project in cooperation with the University of California campuses at Berkeley and Davis, entitled *Alternatives for Future Urban Growth in California's*

*Central Valley: The Bottom Line for Agriculture and Taxpayers.*¹ That study projected two different growth patterns into the future, finding that a continuation of present trends would consume far more farmland and have a greater negative impact on both the agricultural economy and the cost of municipal services than a more compact, efficient model of development that has come to be called "smart growth." In 2006, AFT released another report *The Future Is Now: Central Valley Farmland at the Tipping Point*² which found that, despite the adoption of local plans and policies favoring smarter growth, the pattern of development in the Central Valley has not changed much from a decade earlier. Tulare County was the only county that actually regressed by developing less efficiently than in the past.

AFT places a great deal of emphasis on factual analysis as the basis for public policies that will effectively conserve and protect farmland for agricultural use. We, therefore, offer the facts as we know them as the basis for our comments on the proposed Tulare County general plan update. While we have confidence in our sources and analysis, we acknowledge that the County itself may have better information, gathered from local rather than the statewide sources AFT relied on, that may shed even clearer light on the issues raised by the plan. If so, we encourage the County to recalculate the key figures presented below on farmland conversion and planned growth.

Factual Background

Tulare County has long been acclaimed as a national leader in farmland protection. For more than a quarter-century, its Rural Valley Lands Plan has been celebrated as an innovative approach to preventing the unnecessary development of high quality agricultural land. Recent evidence, however, calls into question the efficacy of the county's overall policy framework – and, not to be ignored, the policies of the cities within it – at preventing the kind of unnecessary farmland conversion that can undermine the health of its agricultural economy.

In a region like the Central Valley where the population is exploding, but the amount of farmland remains relatively fixed,³ the key to minimizing the loss of farmland and, thereby, maintaining agricultural production capacity, is to reduce *per capita* land consumption, i.e., the amount of land developed for each new resident. During the 1990's, development within Tulare County (including its cities) consumed an acre of farmland – 10,070 acres in all – for every 5.7 new residents, ranking it at the very bottom of all Central Valley counties in its performance at avoiding unnecessary farmland loss.⁴ Indeed, measured on a *per capita* basis, Tulare is using up farmland 1.4 times as fast as the Valley as a whole, which itself averaged only 8 people per acre.⁵

¹http://www.farmlandinfo.org/documents/30361/FUTURE_URBAN_GROWTH_IN_CALIFORNIA'S_CENTRAL_VALLEY.pdf

² www.farmland.org/programs/states/futureisnow/default.asp

³ There is simply no substitute for high-quality farmland. As the *Report of the Agricultural Task Force for Resource Conservation and Economic Growth in the Central Valley* (1998), whose vice chair was current state Resources Agency Secretary Mike Chrisman, put it: "During California's post World War II sprawl, new agricultural technologies and additional irrigation allowed more intense agricultural production to occur while prime soils were being urbanized. This is no longer a viable option. We cannot expect the same kinds of yields nor to remain competitive in a global market if agriculture is pushed onto lower quality soils that require higher inputs." <http://www.cfbf.com/issues/landuse/report1.cfm>

⁴ This and, unless otherwise referenced, all other figures in this comment letter are from AFT's 2006 report, *The Future Is Now: Central Valley Farmland at the Tipping Point*, cited above. Most of the raw data on

The inefficiency of development in Tulare County wouldn't be so problematic if the land being lost were not so highly productive. But 58 percent of all the land developed in Tulare during the 1990's – and 71 percent of that developed between 2000 and 2004 – was prime, unique or statewide important farmland. This is attributable to the fact that almost all of Tulare's cities, communities, hamlets and other developing areas are located in the midst of this high quality farmland. Indeed, 78 percent of all the land within current city spheres of influence in Tulare County is high quality farmland. Thus, as long as the existing cities and unincorporated communities in Tulare County continue to grow, it is unrealistic to suggest (as the GPU does) that a strategy of directing development away from high quality farmland can succeed. The only way to truly minimize the loss of the county's best farmland is to reduce the amount of this land consumed by each new resident.

If the current, inefficient development patterns continue, and the county's population grows by the 189,400 people the County's *General Plan Background Report* (at 2-40) predicts by 2025,⁶ Tulare County will lose another 33,200 acres of farmland to urbanization – roughly doubling the current urban area of the county's cities. By contrast, about 50,900 (59%) of the 86,700 acres within the current city spheres of influence in Tulare County remain undeveloped. We have not been able to determine the amount of undeveloped land within community and hamlet urban development boundaries. But the developed area outside city spheres of influence (16,400 acres) represents about 31 percent of the developed area within them.⁷ If we assume that these outlying areas are permitted to grow at roughly the same proportion as areas within spheres, it would suggest that an additional 15,800 acres could be available for development.⁸ Thus, the total land now planned for urban growth appears to be as much as 66,700 acres – more than twice as much as would be needed to accommodate all development through 2025, even if its efficiency is not increased at all. On the other hand, if the efficiency of development were increased to the Valley-wide average of 8 people per acre, only 23,675 acres would be needed to accommodate growth through 2025; and if it were increased to 15 people per acre, roughly comparable to the prevailing average in the Bay Area and urban Southern California, only 12,625 acres would be needed – less than 20 percent of the land currently planned for development.

In summary, Tulare County and its cities are consuming more farmland per new resident than any other county in the Central Valley. They have earmarked far more land for development than is needed for growth through 2025, even if development does not become more efficient. And most of the land being developed, as well as that planned for development around existing cities and other communities, is of the highest quality for agriculture, making a strategy of avoiding high

which that report relies is from the Farmland Mapping and Monitoring Program of the state Department of Conservation.

⁵ For comparison, new development in the urban areas of the Bay Area and Southern California averaged 14 and 15 people per acre respectively in the 1990's.

⁶ The report projects a population of 630,529 by 2025. A 2007 population estimate of 441,100 was obtained by interpolating the 2005 and 2010 data in Table 2-25, yielding a net increase of about 189,400.

⁷ This does not include another 21,000 acres of existing "ranchette" development (rural residences on lots from 1 ½ to 20 acres, which are, needless to say, the most inefficient development of all.

⁸ Estimated by multiplying the 31 percent of development outside spheres by the amount of available land within spheres (0.31 x 50,900 = 15,800).

quality farmland unrealistic. It is against this background that we evaluated the proposed general plan update.

Our Core Recommendation

- Our principal recommendation for improving the draft general plan is to incorporate policies and implementing mechanisms that will commit the county (and the cities within it) to making a concerted, systematic and good faith effort to increase the efficiency of development and thereby reduce overall per capita land consumption to the extent necessary to save a specific amount of high-quality farmland that would otherwise be developed by the year 2025. In this way – and perhaps only in this way – can the County actually implement its proposed policy of “minimiz[ing] the conversion of existing agricultural land ... associated with new development” (LU-1.8, Land Use Element, New Policy, GPR, 5-12) while enabling its cities and other communities to continue to grow.

Increasing development efficiency will also help achieve other smart growth goals that the County says it embraces, among them, reducing public service costs, traffic congestion and air pollution (including greenhouse gas emissions), and creating more economic opportunity for all communities. True economic opportunity for communities in Tulare County can be realized, we submit, without the unnecessary sacrifice of farmland. Indeed, wasting land on sprawling development is widely recognized to be a deterrent to true economic opportunity because of the excessive financial burdens in puts on growing communities.⁹

Critique of the Proposed General Plan Update

The proposed general plan update contains many lofty and laudable goals with respect to protecting farmland through smarter growth, among them:

- “The County will protect its agricultural economy while diversifying employment opportunities.” Value Statement #1, *Goals and Policy Report* (GPR), A-1
- “Protect the county's agricultural uses ... from urban encroachment.” Principle 3, Planning Framework, GPR, A-2
- “Preservation of productive agricultural lands shall be the highest priority when considering modifications (to urban development boundaries).” PF-2.2, Planning Framework, GPR, 2-6
- “The County shall maintain agriculture as the primary land use in the valley region of the county.” AG-1.1, Agriculture Element, GPR, 4-3

⁹ For example, AFT's report *Alternative Futures for California's Central Valley*, cited above, found that a continuation of current development patterns would result in 24% higher public service costs for municipalities than would the same amount of development that is roughly twice as efficient, making it less likely that adequate services could be provided. (Summary Report, at 12).

- "The County shall promote the preservation of its agricultural economic base and open space resources through ... identification of urban growth parameters for all urban areas located in the county." AG-1.7, Agriculture Element, GPR, 4-4
- "The County shall promote the principles of smart growth within UDBs and HDBs, including ... discouraging sprawl, urban infill and preserving open space." LU-1.1, Land Use Element, GPR, 5-12; and last but perhaps most importantly ...
- "The County shall encourage and provide incentives for infill development ... to maximize the use of land within existing urban areas, [and] minimize the conversion of existing agricultural land ... associated with new development. LU-1.8, Land Use Element, New Policy, GPR, 5-12.

We applaud these good intentions. But the ability of the County to achieve these goals will be made very difficult by several other key policy decisions reflected in the proposed GPU:

- New development is permitted in a large number of widely-scattered cities (8), unincorporated communities (19), hamlets (13), and an unspecified number of possible new towns (PF-2, GPR, 2-5; PF-3, GPR, 2-8; PF-5, GPR, 2-10);
- An exceedingly liberal policy of considering urban boundary expansions upon a simple request for subdivision approval, among other methods. (PF-2.2, GPR, 2-6; PF-3.2, GPR, 2-8). This is exacerbated by an illusory policy of allowing urban boundary expansions "only when ... non-agricultural lands are not reasonably available to the community," a condition that will almost always be met because nearly every community and hamlet in the county is surrounded by productive farmland.¹⁰ (PF-4.6, GPR, 2-10)
- The designation of far more land within city spheres of influence and the urban development boundaries of unincorporated communities and hamlets than will be needed to accommodate the population in 2025 (see Factual Background, above).

All of these are open invitations to inefficient urban sprawl that is likely to consume far more agricultural land than is necessary to achieve the county's economic opportunity goals, sacrificing agricultural production, revenue, jobs and open space that could be saved if these policies were tightened. We suggest changes in each of these three policy decisions.

Permitting urban expansion merely through a subdivision proposal, really ought to be reconsidered. There appears to be no good reason for such a piecemeal approach to expansion, one that will be subject to political favoritism and likely to ignore cumulative impacts on farmland. The GPU offers several other, more comprehensive avenues for considering expansion that probably are not as subject to these pitfalls.

¹⁰ Similarly, the proposed new policy of "direct[ing] development away from valuable agricultural lands to cities, unincorporated communities and hamlets (LU-2.1, GPR, 5-15) appears to be completely ineffectual, given that practically all the undeveloped land in these settlements is productive agricultural land.

Permitting development in every existing community, large and small, and allowing adequate room for it to occur (as the first and third of the above policies do), appear to be unavoidable as long as the county is committed to promoting economic opportunity for all. But new towns should be carefully evaluated lest they divert economic opportunity away from existing communities and pose additional risks to agriculture as new magnets for development, land price inflation and potential land use conflicts. And the county should take stronger measures to assure that economic opportunity is not squandered by allowing development to consume more farmland and tax dollars than necessary.

One measure that is essential to preventing unnecessary, counterproductive farmland conversion in Tulare County, given the foregoing circumstances and policies, is the adoption of an explicit policy of minimizing conversion of the highest quality farmland and a mechanism by which to implement it in the only way that is likely to be effective: measure, track and reduce the total amount of farmland consumed by the 189,400 new residents the county will add by 2025.

The closest that the GPU appears to come to such a policy is in its conditions for supporting the expansion of city urban development boundaries:

"The County shall encourage orderly outward expansion of urban development by supporting those city UDB expansion proposals where the city has demonstrated a need for additional territory after documenting a good faith effort to implement an infill development program and *minimize conversion of productive agricultural lands.*"
(Emphasis added, PF-4.6, GPR, 2-10)

Again, the intention is praiseworthy, if limited in scope. But unless there is some way to measure how much land development is consuming, not just in the aggregate and after the fact, but in advance and in terms of the amount used on average for each new resident; and unless there are affirmative steps taken to try to decrease *per capita* land consumption; it is difficult to understand how any city could demonstrate the kind of good faith effort this policy seems to call for. Further, limiting the policy to the expansion of cities, in which the county has only an advisory role, inexplicably excludes the opportunity to minimize farmland conversion in cases where the county has direct approval authority over the expansion of unincorporated communities and hamlets and over the location and configuration of new towns.

Therefore, we propose that the County adopt the following policy (or a refinement thereof) as part of the general plan update. It is intended to supplement the other well-intentioned farmland protection policies in the GPU by providing a test that can be applied to future decisions about development to provide better information on which to base such decisions.

LU-1.x Efficient Development to Minimize Agricultural Land Conversion

The County shall promote efficient development that minimizes the conversion of agricultural land and other resources by adopting and applying Development Efficiency Targets in making future land use decisions affecting agricultural land. The County shall establish Targets for average residential density and commercial floor-to-area ratios (to be applied to public projects as well a private development), based on the amount of land to be dedicated to these uses, the projected population and the goal of limiting future

urbanization of agricultural and other open land within the County (including those portions within cities) to not more than 16,000 acres through the year 2025.¹¹

The County shall use these Targets (and encourage cities to use them) to evaluate existing spheres of influence and urban development boundaries, existing zoning districts, rezoning petitions, community and specific plans, new town proposals, agreements with cities that would expand their spheres of influence or urban development boundaries, and all new development projects within the unincorporated area of the County that are not already part of a community or specific plan. Such evaluations shall include specific findings, to be made available to the general public, that quantify any deviation of the efficiency of the development that is or would be authorized from the applicable Development Efficiency Targets.

The County shall also identify obstacles to increasing the efficiency of urban development and shall adopt (and encourage cities to adopt) changes in policies, zoning, rules and incentives to enable and encourage all communities to meet Development Efficiency Targets.

This proposed policy would be relatively simple to implement¹² and would provide vital information for future land use decision making. It would not require any specific changes in local zoning or subdivision rules, though it could lay the foundation for graduated mitigation fees and other incentives to encourage more efficient development of farmland. What it ultimately would do is focus the attention of decision makers on the critical issue of development efficiency and, by making empirical information available to them and the public, encourage greater accountability for implementing the County policy of minimizing agricultural land conversion. If it is sincere about wanting to conserve farmland and protect agriculture, frankly, we see no good reason why the County would not want to adopt such a policy and implementing mechanisms.

We would welcome the opportunity to discuss our comments and recommendations with County planners, elected officials and others with an interest in conserving farmland and safeguarding the agricultural economy of Tulare County, while providing greater economic opportunity for all.

Respectfully,

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¹¹ This implies an average development efficiency of about 12 people per acre over the period, double the current trend in Tulare County. It would save 25 square miles of farmland. Obviously, a less ambitious goal could be established, but we believe that what we propose is both realistic and worthwhile.

¹² We are incorporating as part of our comments a spreadsheet that begins to suggest a general approach to establishing Development Efficiency Targets and allows the County to substitute its own data for the sample data it contains. A printout of the sample data is on the next page.

Establishing Development Efficiency Targets:	
Comparison of Current Trend with Potential Gains in Efficiency	
<i>Enter data into green cells only.</i>	
Inputs	
Urban Population - Current	300,000
Total Area of Urban Footprint (Ac) - Current	50,000
Percentage of Community = Residential	75%
Population - Projected	490,000
Existing Conditions - Outputs	
Residential Acreage	37,500
Commercial/Other Acreage	12,500
People Per Acre (Gross)	6.0
People Per Acre (Net Residential)	8.0
Average DU/Ac (assume 3 people per household)	2.7
Commercial/Other Density (FAR) - Current	0.25
Improved Development Efficiency Goals	
Target Residential Density (PPA)	16.2
Equivalent Net DU/Ac	5.4
Target FAR	0.35
Current Trend Analysis	
Increase in Area of Residential Area	23,750
Increase in Area of Commercial/Other*	5,938
Total	29,688
Gross PPA for New Development	6.4
New Gross PPA	6.1
Improved Efficiency Alternative Analysis	
Increase in Residential Area (at Target Density)	11,761
Increase in Commercial/Other Area (at Target FAR)*	4,241
Total	16,002
Gross PPA for New Development	11.9
New Gross PPA	7.4
Total Land Saved by Meeting Targets	13,685
Percentage of Land Saved	46%
Proportion due to Residential	88%
Proportion due to Commercial/Other	14%
Increase in Gross Residential Density	102%
* Assumes same pct of footprint is commercial/other in future.	