

Scott Johnson

From: Trees Sacramento <trees4sacto@sbcglobal.net>
Sent: Friday, April 10, 2015 2:28 PM
To: Trees Sacramento
Cc: Evan Compton; Scott Johnson; Jose Bodipo-Memba; Kiyomi Burchell; Cornelious Burke; Ed Chandler; Douglas Covill; Rommel Declines; Todd Kaufman; Kim Mack; David Nybo; Matthew Rodgers; Joe Yee; darrellteatjr@yahoo.com; Steve Hansen
Subject: Rooftop Gardens: Sacramento Commons review and comment by Sacramento Planning Commission
Attachments: NEARBY ROOF GARDENS2.pdf

Planning Staff and Commissioners

Regarding the proposed use of rooftop gardens to offset negative impacts of demolition of mature canopy trees, please note the attached photographs of rooftop gardens near Capitol Towers and Villas, their date of construction, and their obvious lack of benefits associated with tree canopy when compared with nearby trees planted in the ground.

| O9-1

Trees Sacramento
trees4sacto@sbcglobal.net

NEARBY ROOF GARDENS



Foreground Wells Fargo Bank completed 1992 (400 Capitol Mall)
Background West America Bank completed 1984 (closeup below) (300 Capitol Mall)



NEARBY ROOFTOP GARDENS

EDD (around 1980). Note street trees along 8th Street towering over the garden trees which are planted in limited planter box space and remain small after 35 years.



NEARBY ROOFTOP GARDENS – PERS Lincoln Plaza 1986 Building (below) is noted for vegetation and trees at each level of setback, but no rooftop garden. Note size of terrace trees relative to ground planted trees.



RESPONSE TO COMMENT O9-1

The commenter references tree and tree canopy impacts and rooftop trees in other locations.

Please see Master Response 2.3.2.1 for information related to the existing setting, Master Response 2.3.2.2 for information related to tree removal, Master Response 2.3.2.3 for information related to the landscape plan, Master Response 2.3.2.4 for information related to aesthetic changes related to tree removal, Master Response 2.3.2.5 for information related to GHG sequestration benefits of trees, Master Response 2.3.2.6 for information related to project revisions to reduce removal of trees, Master Response 2.3.2.7 for information related to the City's significance determination related to tree impacts, Master Response 2.3.2.8 for information related to mitigation of tree-related impacts, Master Response 2.3.2.9 for information related to ecosystem services and tree growth calculations, Master Response 2.3.2.11 for information related to rooftop trees, Master Response 2.3.2.12 for information related to non-heritage trees, and Master Response 2.3.2.13 regarding other environmental benefits of trees.

COMMENT LETTER O10 – AMERICAN INSTITUTE OF ARCHITECTS



AIA Central Valley
A Chapter of The American Institute of Architects

Letter O10

April 22, 2015

Scott Johnson, Associate Planner
City of Sacramento, Community Development Department
Environmental Planning Services
300 Richards Boulevard, Third Floor
Sacramento, CA 95811-0218

**Re: Review and Comment / Sacramento Commons Project (P14-012)
(SCH#: 2014042032)**

Dear Scott,

On behalf of the Board of Directors of the American Institute of Architects, Central Valley Chapter (AIA CV), we thank you for the opportunity to provide feedback on the Sacramento Commons project.

O10-1

Last October, the Board invited developer Dave Eadie, Project Manager with Kennedy-Wilson and architect Johannes van Tilburg, FAIA of VTBS Architects to discuss the project. In December we met with Gretchen Steinberg, President of Sacramento Modern, Carr Kunze, Housing Specialist and Donald Cox with the Sacramento Old City Association (SOCA) to receive an update on the Historic District Nomination. As a result of these meetings, and additional board and committee discussions, we provide the following feedback for your consideration.

O10-2

First and foremost, the AIA CV is excited to see density-focused Smart Growth design in the urban core. Controlled and sustainable growth is critical to the continuing improvement of the quality of life in the Sacramento region. With this in mind, we encourage the city to continue to explore how housing density can best be distributed across multiple sites in the City, including and beyond Sacramento Commons.

O10-3

We also appreciate that the site circulation and pedestrian experience has improved from a previous version we discussed with the project architect. The original Capitol Towers and Garden Apartment design specifically took into account the cooling southwest summer breezes for natural ventilation, and to reduce urban heat island effect. This is unique to designs in our Valley and needs to remain – not only for the quality of life and environmental implications for the site, but also for its impacts on adjoining sites.

O10-4

1400 S STREET, SUITE 100
SACRAMENTO, CA 95814
(916) 444-3658 PHONE | (916) 444-3005 FAX



AIA Central Valley
A Chapter of The American Institute of Architects

There is historic significance to the existing site, and value in the unique community that has been formed through the existing development pattern and single ownership. It is thus vital that oversight and specific guidelines are in place for future development at the site to ensure that future parcels are managed in a manner that respects and maintains the original character of this historic urban development as much as possible. The determination of the site's eligibility for the National Register of Historic Places is premised as much on its range of structures as it is on their spatial organization, building placement and relationships, and the landscape features that unite them. Each of these qualities becomes more difficult to preserve without proper controls in place. Related to this, the owner's support of the historic nomination is of value in improving and fostering community relationships and the design overall and is therefore welcomed and encouraged.

O10-5

Thank you again for the opportunity to share our thoughts on this project. AIACV welcomes the opportunity to be a resource and partner in your efforts on this and other upcoming critical issues. We share a common aim for smart growth in Sacramento, and welcome continued partnership and dialogue to address the competing environmental, economic, and infrastructure demands that must be met to achieve these ends. Please reach us through our Chapter's Executive Director, Kimberly Anderson, Hon. AIACC at 916-444-3658 or kanderson@aiacv.org.

O10-6

Sincerely,

Michael Parrott, AIA
President, AIACV

Brian Sehnert, AIA / bVerdant
Board Director, AIACV

Michael Novak, AIA / Lionakis
Board Director, AIACV

Laura Wood, Assoc. AIA / Nacht&Lewis
Associate Director

Paul Sherfey, Assoc. AIA

1400 S STREET, SUITE 100
SACRAMENTO, CA 95814
(916) 444-3658 PHONE | (916) 444-3005 FAX

RESPONSE TO COMMENT O10-1

The commenter thanks the City for the opportunity to comment on the DEIR.

The City acknowledges this comment and has provided responses to the comment letter.

RESPONSE TO COMMENT O10-2

The commenter mentions background on the project including the historic status of the project site.

The City acknowledges this introductory comment. Please see Master Response 2.3.4.1 for information on historic resources impacts under CEQA, Master Response 2.3.4.2 for a summary of the project's historic resources impacts.

RESPONSE TO COMMENT O10-3

The commenter expresses support for dense development of the urban core.

See Master Responses 2.3.4.5 and 2.3.10, which address consistency with General Plan policy and Master Response 2.3.7.5, which addresses off-site alternatives. The purpose of the EIR is to disclose, mitigate, and find alternatives that reduce adverse physical environmental effects associated with the project. However, the City provides a comprehensive discussion of population and housing that is related to the comment in Chapter 3 of the DEIR.

RESPONSE TO COMMENT O10-4

The commenter expresses support for changes to the project that improve circulation and the pedestrian experience and notes that the original design took into account southwesterly summer breezes.

The City acknowledges the commenters support for revisions to the site plan. Please refer also to the Response to O6-47.

RESPONSE TO COMMENT O10-5

The commenter references the historic status of the project site.

Please see Master Response 2.3.4.1 for information on historic resources impacts under CEQA, Master Response 2.3.4.2 for a summary of the project's historic resources impacts, Master Response 2.3.4.3 regarding disagreement among experts in an EIR, Master Response 2.3.4.4 for additional mitigation considered for historic resources impacts, Master Response 2.3.4.5 regarding consistency with the General Plan, and Master Response 2.3.4.6 regarding the City's discretion to approve a project despite significant effects.

RESPONSE TO COMMENT O10-6

The commenter expresses support for smart growth in Sacramento.

Please see the Response to Comment O10-3, above.

COMMENT LETTER O11 – PIONEER TOWER RESIDENTS’ COUNCIL

**PIONEER TOWER RESIDENTS' COUNCIL
Sacramento Commons Committee
515 P STREET #605
SACRAMENTO, CA 95814
916-441-3762**

RESIDENTS' LETTERS

TO

PLANNING COMMISSION

Ap#605

July, 2014

Sacramento City Council Members
Sacramento Planning Commission Members

Re: Sacramento Commons

Dear Esteemed Members,

The following checked remarks express my opinions on the proposed Sacramento Commons project.

- Capitol Tower and Villa Apartments complex is an award-winning, beautiful and successful living environment. Please don't destroy our one-of-a-kind urban oasis.
- Sacramento is a City of Trees, and we will lose our trees, tree canopies and vibrant wildlife.
- Do not remove Villa Apartments. Our friends are living here.
- No plans exist for "low-income housing."
- King's Arena will have very heavy traffic around our four-block area. Add 1300 more tenants, we will suffer daily gridlock and increased noise.
- King's Arena will leave no parking for guests and state employees. Add the 1300 more tenants and their guests, and the situation will be exceedingly impossible.
- Construction will continue through the years with dust, noise, and workmen expanding hours as completion deadlines loom. Workmen will not have parking available to them, as well.

O11-1

after these structures are destroyed will they continue to build or will the city have another boarded up empty lot, like other parcels throughout our city. So many lives will be affected by this construction this park living setting is used by so many morning, noon and beautiful evening walks. This block is a landmark for the City of Sacramento.

Respectfully,

July, 2014

Sacramento City Council Members
Sacramento Planning Commission Members

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- ✓ King's Arena will have very heavy traffic around our four-block area. Add 1300 more tenants, we will suffer daily gridlock and increased noise, *and Crowding Conditions!*
- ✓ King's Arena will leave no parking for guests and state employees. Add the 1300 more tenants and their guests, and the situation will be exceedingly impossible. *It's already bad enough!*
- ✓ Construction will continue through the years with dust, noise, and workmen expanding hours as completion deadlines loom. Workmen will not have parking available to them, as well, *disrupting our rights to quiet enjoyment of living.*
- ✓ *You will destroy the Classy-Classic home feeling of this Community. It will become an extended ghetto, but you don't care because you don't live here!*

Respectfully,

Gail Betty
Pioneer Towers resident x 1 year

O11-1
cont.

July, 2014

Sacramento City Council Members
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O11-1
cont.

Respectfully,

pooyce ju #713

July, 2014

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Sacramento Planning Commission Members

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O11-1
cont.

Respectfully,

yulan zhao 7/18/14

July, 2014

Sacramento City Council Members
Sacramento Planning Commission Members

Re: Sacramento Commons

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- X Construction will continue through the years with dust, noise, and workmen expanding hours as completion deadlines loom. Workmen will not have parking available to them, as well.
- X Seniors and disables need calm living environment

Respectfully,

Jan Xu and Yigang Sun
515 P St Apt 915

O11-1
cont.

July, 2014

Sacramento City Council Members
Sacramento Planning Commission Members

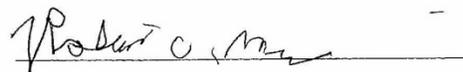
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O11-1
cont.



July, 2014

Sacramento City Council Members
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7 It is well known that when population goes up, today's crime? what have you in place to curb this? Respectfully,

Have there been feasibility studies done with this in mind?
 Dieta A. Menefee
 what were the results?
 P.S. Parking is already a problem. it can only be compounded.

O11-1
cont.

July, 2014

Sacramento City Council Members
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O11-1
cont.

Leave Well Enough Alone, I do believe that is what the tenants want, I am just a new tenant. I all my 90 yrs. Respectfully, am a home body

Allen G. Williams - Apt. # 1212

I only knew the old Sacto. in town now its not the same to me, what can I say. It can

July, 2014

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Sacramento Planning Commission Members

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✓ Crime, will come with New Arena
and if Hotel is built, more Crime, public safety first

Respectfully,



O11-1
cont.



July, 2014

Sacramento City Council Members
Sacramento Planning Commission Members

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✓ *I use a walker w/wheels. I'm 71 yrs. As it is I have to park my car 2 or three blocks from Pioneer Tower. (where I live) There is no parking on the streets right now! I use the beautiful "tree & lawn" area at Capitol Tower & Villa Apts.*

Respectfully,
Barbara Cio

O11-1
cont.



July, 2014

Sacramento City Council Members
Sacramento Planning Commission Members

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O11-1
cont.

Respectfully,

807 PLUMER TOWERS

JAMES DENBOER



July, 2014

Sacramento City Council Members
Sacramento Planning Commission Members

Re: Sacramento Commons

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O11-1
cont.

Please give serious consideration to
all of the above

Respectfully,

Jill R. Decorde



July, 2014

Sacramento City Council Members
Sacramento Planning Commission Members

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O11-1
cont.

Respectfully,

Mr. Myzhen #60107-18-14

July, 2014

Sacramento City Council Members
Sacramento Planning Commission Members

Re: Sacramento Commons

Dear Esteemed Members,

The following checked remarks express my opinions on the proposed Sacramento Commons project.

- yes Capitol Tower and Villa Apartments complex is an award-winning, beautiful and successful living environment. Please don't destroy our one-of-a-kind urban oasis.
- yes Sacramento is a City of Trees, and we will lose our trees, tree canopies and vibrant wildlife.
- yes Do not remove Villa Apartments. Our friends are living here.
- yes No plans exist for "low-income housing."
- yes King's Arena will have very heavy traffic around our four-block area. Add 1300 more tenants, we will suffer daily gridlock and increased noise.
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- yes Construction will continue through the years with dust, noise, and workmen expanding hours as completion deadlines loom. Workmen will not have parking available to them, as well.

Please do not destroy this area of
quiet and beauty

Respectfully,

Eva O. Gowder

O11-1
cont.

July, 2014

Sacramento City Council Members
Sacramento Planning Commission Members

Re: Sacramento Commons

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— Do not remove Villa Apartments. Our friends are living here.

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X Construction will continue through the years with dust, noise, and workmen expanding hours as completion deadlines loom. Workmen will not have parking available to them, as well. *and I get nothing from my discomfort.*

— *lets an ill thought out project that will leave SAC a bankrupt ghost town with unfinished projects. Except for malls & Caminit purchase a dress, shoes, household goods, gasoline, groceries, PET Supplies our nursery plants down town and it is dirty and dangerous.*

Respectfully,
Linda Hefalia
Pioneer Tower

O11-1
cont.

July, 2014

Sacramento City Council Members
Sacramento Planning Commission Members

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✓ *Born & raised in this town. This will be a pure headache for tenants & future tenants.*

Respectfully,

Joseph R. Garcia Unit 607

O11-1
cont.

July, 2014

Sacramento City Council Members
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O11-1
cont.

I totally agree, I'm not that old, but not healthy, I wish all the luck.

Respectfully,

But unless people unite the big money @ 50. you don't have a chance. But God. luck
Van Mundell
Apr 805

July, 2014

Sacramento City Council Members
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- ✓ King's Arena will leave no parking for guests and state employees. Add the 1300 more tenants and their guests, and the situation will be exceedingly impossible.
- ✓ Construction will continue through the years with dust, noise, and workmen expanding hours as completion deadlines loom. Workmen will not have parking available to them, as well. *Noise by itself could drive residents out of area permanently. Noise levels could be horrendous, parking a nightmare.*

We already have many hotel rooms on J Street, etc etc. We should love + protect our trees, which labored so long to get where they are now. More noise will make the area less desirable to newcomers + perhaps old timers will move out. The proposed arena will completely alter the existing area which includes

*Pioneer tower,
Capitol tower,
Capitol Villa,
Crocker Museum,
California Office Bldg.
& Restaurant, etc.*

Respectfully,

*Dorothy Swartz Melson # 714
(916) 448-2299
7-17-2014*

O11-1
cont.

July, 2014

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Sacramento Planning Commission Members

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- ✓ King's Arena will have very heavy traffic around our four-block area. Add 1300 more tenants, we will suffer daily gridlock and increased noise.
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- ✓ Construction will continue through the years with dust, noise, and workmen expanding hours as completion deadlines loom. Workmen will not have parking available to them, as well.

O11-1
cont.

Respectfully,



July, 2014

Sacramento City Council Members
Sacramento Planning Commission Members

Re: Sacramento Commons

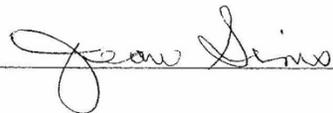
Dear Esteemed Members,

The following checked remarks express my opinions on the proposed Sacramento Commons project.

- ✓ Capitol Tower and Villa Apartments complex is an award-winning, beautiful and successful living environment. Please don't destroy our one-of-a-kind urban oasis.
- ✓ Sacramento is a City of Trees, and we will lose our trees, tree canopies and vibrant wildlife.
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O11-1
cont.

Respectfully,



July, 2014

Sacramento City Council Members
Sacramento Planning Commission Members

Re: Sacramento Commons

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- Capitol Tower and Villa Apartments complex is an award-winning, beautiful and successful living environment. Please don't destroy our one-of-a-kind urban oasis.
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O11-1
cont.

Respectfully,

Stella Toplak #1101

July, 2014

Sacramento City Council Members
Sacramento Planning Commission Members

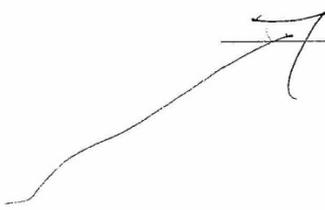
Re: Sacramento Commons

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Respectfully,



O11-1
cont.



July, 2014

Sacramento City Council Members
Sacramento Planning Commission Members

Re: Sacramento Commons

Dear Esteemed Members,

The following checked remarks express my opinions on the proposed Sacramento Commons project.

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 - Construction will continue through the years with dust, noise, and workmen expanding hours as completion deadlines loom. Workmen will not have parking available to them, as well.
- Stop where the Sacramento River diversion damages our wildlife conservation. Anyone can see these halls of population are a controversy of easement, not progress. This worst possible scenario begs a grave nuclear error. May the neighborhood become an honor and work of art to the muse. One will find the "bullet train" survey hastens comprehension of the wildlife threat.

Respectfully,

J.M.M. 20 July 2014

O11-1
cont.

July, 2014

Sacramento City Council Members
Sacramento Planning Commission Members

Re: Sacramento Commons

Dear Esteemed Members,

The following checked remarks express my opinions on the proposed Sacramento Commons project.

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- ✓ Construction will continue through the years with dust, noise, and workmen expanding hours as completion deadlines loom. Workmen will not have parking available to them, as well.
- ✓ Parking is very difficult now, what will it be like then

Respectfully,

Nancy Fordyce

O11-1
cont.

July, 2014

Sacramento City Council Members
Sacramento Planning Commission Members

Re: Sacramento Commons

Dear Esteemed Members,

The following checked remarks express my opinions on the proposed Sacramento Commons project.

- Capitol Tower and Villa Apartments complex is an award-winning, beautiful and successful living environment. Please don't destroy our one-of-a-kind urban oasis.
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- Construction will continue through the years with dust, noise, and workmen expanding hours as completion deadlines loom. Workmen will not have parking available to them, as well.

I DO NOT WANT THIS AREA LOOKING LIKE
A "CONCRETE" JUNGLE.

Respectfully,

A CONCERNED TENANT.

O11-1
cont.

July, 2014

Sacramento City Council Members
Sacramento Planning Commission Members

Re: Sacramento Commons

Dear Esteemed Members,

The following checked remarks express my opinions on the proposed Sacramento Commons project.

- Capitol Tower and Villa Apartments complex is an award-winning, beautiful and successful living environment. Please don't destroy our one-of-a-kind urban oasis.
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O11-1
cont.

Respectfully,



July, 2014

Sacramento City Council Members
Sacramento Planning Commission Members

Re: Sacramento Commons

Dear Esteemed Members,

The following checked remarks express my opinions on the proposed Sacramento Commons project.

Capitol Tower and Villa Apartments complex is an award-winning, beautiful and successful living environment. Please don't destroy our one-of-a-kind urban oasis.

Sacramento is a City of Trees, and we will lose our trees, tree canopies and vibrant wildlife.

Do not remove Villa Apartments. Our friends are living here.

No plans exist for "low-income housing."

King's Arena will have very heavy traffic around our four-block area. Add 1300 more tenants, we will suffer daily gridlock and increased noise.

King's Arena will leave no parking for guests and state employees. Add the 1300 more tenants and their guests, and the situation will be exceedingly impossible.

Construction will continue through the years with dust, noise, and workmen expanding hours as completion deadlines loom. Workmen will not have parking available to them, as well.

*Thank you for
bringing nothing to
the table*

Respectfully,

Don Carroll

O11-1
cont.



July, 2014

Sacramento City Council Members
Sacramento Planning Commission Members

Re: Sacramento Commons

Dear Esteemed Members,

The following checked remarks express my opinions on the proposed Sacramento Commons project.

- ✓ Capitol Tower and Villa Apartments complex is an award-winning, beautiful and successful living environment. Please don't destroy our one-of-a-kind urban oasis.
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✓ _____

Respectfully,

Marilyn Demande
Jamela Roberts

O11-1
cont.



July, 2014

Sacramento City Council Members
Sacramento Planning Commission Members

Re: Sacramento Commons

Dear Esteemed Members,

The following checked remarks express my opinions on the proposed Sacramento Commons project.

- X Capitol Tower and Villa Apartments complex is an award-winning, beautiful and successful living environment. Please don't destroy our one-of-a-kind urban oasis.
- X Sacramento is a City of Trees, and we will lose our trees, tree canopies and vibrant wildlife.
- X Do not remove Villa Apartments. Our friends are living here.
- X No plans exist for "low-income housing."
- X King's Arena will have very heavy traffic around our four-block area. Add 1300 more tenants, we will suffer daily gridlock and increased noise.
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- X Construction will continue through the years with dust, noise, and workmen expanding hours as completion deadlines loom. Workmen will not have parking available to them, as well.

O11-1
cont.

*I have lived in this particular
"garden spot" for 30+ years!!!*

Respectfully,

*Martha A. Barajas, USN (Ret.)
#1204
Pioneer Tower*

July, 2014

Sacramento City Council Members
Sacramento Planning Commission Members

Re: Sacramento Commons

Dear Esteemed Members,

The following checked remarks express my opinions on the proposed Sacramento Commons project.

- ✓ Capitol Tower and Villa Apartments complex is an award-winning, beautiful and successful living environment. Please don't destroy our one-of-a-kind urban oasis.
- ✓ Sacramento is a City of Trees, and we will lose our trees, tree canopies and vibrant wildlife.
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- ✓ Construction will continue through the years with dust, noise, and workmen expanding hours as completion deadlines loom. Workmen will not have parking available to them, as well.

✓ PLEASE DO NOT DESTROY OUR VIEW OF TREES
WALK WAY THRU COMPLEX'S - QUALITY OF AIR - TRAFFIC.

Respectfully,

Juanita Delgado Apt. 411
PIONEER TOWERS

O11-1
cont.

July, 2014

Sacramento City Council Members
Sacramento Planning Commission Members

Re: Sacramento Commons

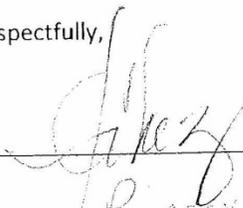
Dear Esteemed Members,

The following checked remarks express my opinions on the proposed Sacramento Commons project.

- ✓ Capitol Tower and Villa Apartments complex is an award-winning, beautiful and successful living environment. Please don't destroy our one-of-a-kind urban oasis.
- ✓ Sacramento is a City of Trees, and we will lose our trees, tree canopies and vibrant wildlife.
- ✓ Do not remove Villa Apartments. Our friends are living here. - Displacement is unacceptable
- ✓ No plans exist for "low-income housing."
- ✓ King's Arena will have very heavy traffic around our four-block area. Add 1300 more tenants, we will suffer daily gridlock and increased noise.
- ✓ King's Arena will leave no parking for guests and state employees. Add the 1300 more tenants and their guests, and the situation will be exceedingly impossible.
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O11-1
cont.

Respectfully,



 John A. Kelly
 Pioneer Towers

July, 2014

Sacramento City Council Members
Sacramento Planning Commission Members

Re: Sacramento Commons

Dear Esteemed Members,

The following checked remarks express my opinions on the proposed Sacramento Commons project.

- ✗ Capitol Tower and Villa Apartments complex is an award-winning, beautiful and successful living environment. Please don't destroy our one-of-a-kind urban oasis.
- ✗ Sacramento is a City of Trees, and we will lose our trees, tree canopies and vibrant wildlife.
- ✗ Do not remove Villa Apartments. Our friends are living here.
- ✗ No plans exist for "low-income housing."
- ✗ King's Arena will have very heavy traffic around our four-block area. Add 1300 more tenants, we will suffer daily gridlock and increased noise.
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- ✗ Construction will continue through the years with dust, noise, and workmen expanding hours as completion deadlines loom. Workmen will not have parking available to them, as well.

X Sacramento is renowned for being the city of trees
here in the whole of the USA. People that way
 People come from all over the world to see & admire
 the trees. They are unique - we grow trees that come from
 all parts of this amazing Planet.
 Respectfully,
Shodor J. Kay
 Repercussions will occur - monetary gain will be lost
 as well as plants, people, animals, birds as well. Greed

O11-1
cont.

July, 2014

Sacramento City Council Members
Sacramento Planning Commission Members

Re: Sacramento Commons

Dear Esteemed Members,

The following checked remarks express my opinions on the proposed Sacramento Commons project.

- Capitol Tower and Villa Apartments complex is an award-winning, beautiful and successful living environment. Please don't destroy our one-of-a-kind urban oasis.
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— E.E. Hermon
 575 P # 1217

Respectfully,

E.E. Hermon

O11-1
cont.



July, 2014

Sacramento City Council Members
Sacramento Planning Commission Members

Re: Sacramento Commons

Dear Esteemed Members,

The following checked remarks express my opinions on the proposed Sacramento Commons project.

- ✓ Capitol Tower and Villa Apartments complex is an award-winning, beautiful and successful living environment. Please don't destroy our one-of-a-kind urban oasis. *- Sacramento is famous for its "Corridor of green trees - a canopy"!*
- ✓ Sacramento is a City of Trees, and we will lose our trees, tree canopies and vibrant wildlife. *- Impacts the habitats of hummingbirds - many birds, and butterflies*
- ✓ Do not remove Villa Apartments. Our friends are living here. *- Displacement of long term residents.*
- ✓ No plans exist for "low-income housing."
- ✓ King's Arena will have very heavy traffic around our four-block area. Add 1300 more tenants, we will suffer daily gridlock and increased noise. *- would stir up dusts and multiple allergens!*
- ✓ King's Arena will leave no parking for guests and state employees. Add the 1300 more tenants and their guests, and the situation will be exceedingly impossible. *- A very real concern & worry for everyone here; where will you park?*
- ✓ Construction will continue through the years with dust, noise, and workmen expanding hours as completion deadlines loom. Workmen will not have parking available to them, as well.
- ✓ *Would the disruption and permanent ruination of our lives due to this proposed massive development, as mostly older citizen voters, translate as a conscionable financial gain for investors; justifying this action as a betterment for us residents? Respectfully,*
Please stop.

Fely A. Horan
Pioneer Towers #1216

O11-1
cont.

July, 2014

Sacramento City Council Members
Sacramento Planning Commission Members

Re: Sacramento Commons

Dear Esteemed Members,

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*I would like to offer my time,
effort or any help needed to aid this project*

Respectfully,

Maureen Theil # 818

O11-1
cont.

July, 2014

Sacramento City Council Members
Sacramento Planning Commission Members

Re: Sacramento Commons

Dear Esteemed Members,

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O11-1
cont.

Respectfully,

Josephine STEPHENS

July, 2014

Sacramento City Council Members
Sacramento Planning Commission Members

Re: Sacramento Commons

Dear Esteemed Members,

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— Capitol Tower and Villa Apartments complex is an award-winning, beautiful and successful living environment. Please don't destroy our one-of-a-kind urban oasis.

Sacramento is a City of Trees, and we will lose our trees, tree canopies and vibrant wildlife.

— Do not remove Villa Apartments. Our friends are living here.

No plans exist for "low-income housing."

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— Construction will continue through the years with dust, noise, and workmen expanding hours as completion deadlines loom. Workmen will not have parking available to them, as well.

— Mary L. Dueprene

Respectfully,

O11-1
cont.



July, 2014

Sacramento City Council Members
Sacramento Planning Commission Members

Re: Sacramento Commons

Dear Esteemed Members,

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O11-1
cont.

Respectfully,



July, 2014

Sacramento City Council Members
Sacramento Planning Commission Members

Re: Sacramento Commons

Dear Esteemed Members,

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- ___ Capitol Tower and Villa Apartments complex is an award-winning, beautiful and successful living environment. Please don't destroy our one-of-a-kind urban oasis.
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- ___ Construction will continue through the years with dust, noise, and workmen expanding hours as completion deadlines loom. Workmen will not have parking available to them, as well.

___ Please, don't create a housing ghetto.
 ___ How will my living area change?

Respectfully,

Charles Seeger

O11-1
cont.



July, 2014

Sacramento City Council Members
Sacramento Planning Commission Members

Re: Sacramento Commons

Dear Esteemed Members,

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Respectfully,

 "716"

O11-1
cont.

**PIONEER TOWER RESIDENTS' COUNCIL
Sacramento Commons Committee
515 P STREET #605
SACRAMENTO, CA 95814
916-441-3762**

SIGNED PETITIONS

TO

PLANNING COMMISSION

O11-1
cont.



PETITION to Sacramento Mayor, City Council, and Planning Commission

reserve Our Livable Downtown Housing: Say "NO" to the "Sacramento Commons" Project (Capitol Villas replacement)

WE RESPECTFULLY ASK THAT THE CITY OF SACRAMENTO REJECT the current Application of Kennedy Wilson for its Sacramento Commons" Project. We also ask that the City host meetings between the Capitol Villas owner and area residents to cooperatively formulate and implement a realistic win-win plan for Capitol Villas that would accomplish the goals of the City, the developer, and neighborhood while retaining the trees, park-like public green spaces, historically significant architectural design, and other features that have made this area so desirable for decades.

TO CITY: Please mail notices of hearings, staff reports, and documents regarding this project to the undersigned as follows:

Your Name	Address	City	zip	Phone #	E-mail (OPTIONAL)
Muriel B. Kemmer	500 N St #1209 Sacramento	Sacramento	95814		KWemmer@earthlink.net
Ann Marie Coakley	8801 Alexander Dr #1412	Sac	95861		Annmarieford@yahoo.com
CE	1308 28th St	Sac	95816		ptinac@capitolpt.com
Debra Candelwood	1305 28th St	Sac	CA 95816		akcaval@capitolpt.com
Kristic Babinow	1308 28th St	Sac	CA 95816		KIDRABLOW@CAPITOLPT.COM
Mailela Mastenby	1308 28th St	Sac	CA 95816		Mailela-P-Mastenby@yahoo.com
Wendy Voss	1308 28th St	Sac	CA 95816		
Brandon Stone	1308 28th St Sacramento	CA	95816		brandonstone1@yahoo.com
Joe Sennac	716 23rd St Sacramento	CA	95816		JOE.SENNAC@YAHOO.COM
Armando Adams	2716 N Street	Sac	CA 95816		armandoarados@yahoo.com
Zaire Anderson	2714 N Street	Sac	CA 95816		Zaire-anderson@yahoo.com
Keim Franzen	5741 Lorella Way	Sac	CA 95842		brothm@hotmail.com
Stacy Stein	9442 S. Cliff Way	ES	CA 95758		
Meghan Eichhorn	2445 Dinner Way	Sac	CA 95818	(916) 814-0525	
Scott Isaacs	500 N St #1209 Sacramento	CA	95814		KWemmer@earthlink.net
Scott Isaacs	2311 E St #5 Sacramento	CA	95816		

Please return to Neighbors of Capitol Towers and Villas, 500 N Street # 1403, Sacramento Ca. 95814. Follow on Facebook!

PETITION to Sacramento Mayor, City Council, and Planning Commission

Preserve Our Livable Downtown Housing: Say "NO" to the "Sacramento Commons" Project (Capitol Villas replacement)

WE RESPECTFULLY ASK THAT THE CITY OF SACRAMENTO REJECT the current Application of Kennedy Wilson for its "Sacramento Commons" Project. We also ask that the City host meetings between the Capitol Villas owner and area residents to cooperatively formulate and implement a realistic win-win plan for Capitol Villas that would accomplish the goals of the City, the developer, and neighborhood while retaining the trees, park-like public green spaces, historically significant architectural design, and other features that have made this area so desirable for decades.

TO CITY: Please mail notices of hearings, staff reports, and documents regarding this project to the undersigned as follows:

Your Name	Address	City zip	Phone #, E-mail (OPTIONAL)
Robert Shiner	500 "N" St #44	Sacramento, 95814	
Gary J. Daley	1021 York St.	Sacramento 95818	
Raymond J. Javi	9 COBOLACOURT	SACRO 95811	
Walter S. [unclear]	515 P St. #915	Sacramento 95814	
James M. [unclear]	515 P St 712	Sacramento 95814	
John [unclear]	3819 F [unclear] Ave	95816	
James Finley	912 Mendocino Ave	95817	
Adam Varman	9490 Dinkerton Way	95758	
M. Chocelas	6423 Lang Ave	Sac CA. 95823	
Wendy [unclear]	515 P St.	Sac CA 95814	
Jim LaBelle	420 Hebron Cir.	Sacramento CA 95835	
DIANA Kirkley	597 P St	Sacramento, CA 95814	
ADOLFO JANEZ GARCIA	2145 W. El Camino	Sacramento CA 95833	
VICTOR JANEZ	2025 W El Camino	Sacramento CA 95833	
DARIS YAMAMOTO	415 NUBERRY ST.	SACRAMENTO, CA 95859	
Martha [unclear]	1561 TANNER RD.	W-SACRO CA 95691	

*Please return to Neighbors of Capitol Towers and Villas, 500 N Street # 1403, Sacramento Ca. 95814. Follow on Facebook!

PETITION to Sacramento Mayor, City Council, and Planning Commission

Preserve Our Livable Downtown Housing: Say "NO" to the "Sacramento Commons" Project (Capitol Villas replacement)

WE RESPECTFULLY ASK THAT THE CITY OF SACRAMENTO REJECT the current Application of Kennedy Wilson for its "Sacramento Commons" Project. We also ask that the City host meetings between the Capitol Villas owner and area residents to cooperatively formulate and implement a realistic win-win plan for Capitol Villas that would accomplish the goals of the City, the developer, and neighborhood while retaining the trees, park-like public green spaces, historically significant architectural design, and other features that have made this area so desirable for decades.

TO CITY: Please mail notices of hearings, staff reports, and documents regarding this project to the undersigned as follows:

Your Name	Address	City zip	Phone #, E-mail (OPTIONAL)
Jing Wang	515 P St, Sacto Ca	95814	
Amy Taylor	508 Sheffield rd	FWB FL 32547	
Wanda Montoya	29554 Warming Springs	Menifee CA	
Ms. Leatrice	same	Menifee	
Amber Jones	1816 9th Street	Sacto. CA	
Boya Ju	703 515 P St.	Sacto. CA	
Daha Bradley	9823 Grizzly Ct.	95757	
Yanqa Elkins	---	Sacto 95826	
Halle Fisher	---	Sacto 95818	
Marijo Hernandez	515 P ST. # 616	SACTO, CA 95814	
JAMES GIBERT	515 P. ST # 616	SACTO, CA 95814	
DIANE JOHNSON	2953 DENISE CT	W. SAC 95691	
RAY JONES	1707 Vesper Way	Sac 95835	
Shreeda Khao	5692 Harold Way	Sac 95822	
Jamie Rodriguez	8700 Genstone Ct	EG 95624	
Carmi Guajada	1600 9th Street	Sac CA 95814	

Please return to Neighbors of Capitol Towers and Villas, 500 N Street # 1403, Sacramento Ca. 95814. Follow on Facebook!

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cont.

PETITION to Sacramento Mayor, City Council, and Planning Commission

Preserve Our Livable Downtown Housing: Say "NO" to the "Sacramento Commons" Project (Capitol Villas replacement)

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TO CITY: Please mail notices of hearings, staff reports, and documents regarding this project to the undersigned as follows:

Your Name	Address	City zip	Phone #, E-mail (OPTIONAL)
Jose Marin		Sac 95814	
Jonna Chow		Sac 95814	
Marcela Lopez		sac 95814	
Quantia Phillips	515 P St	SAC 95814	
J.A. Kulkarni	7800 A Street	SAC 95823	
Aileen Gubear	576 G St	Sac 95811	
Spencer Pland		Sac 95817	
Spencer Puentes	1600 9th St	Sac. 95811	
Amista Jantorelli		Sac 95814	
Samantha Lam		Sac 95818	
James McChell	744 P St	Sac 95814	654-1286
Sheri Barkoder		sac 95834	
Bryan		Commandant 95882	
Gandra Sreeringer	744 P St	SACCA 95814	916 216 0332
Teresa Lopez		Sac. 95818	916) 271 - 2291
Korena Scott	500 N St	Sac 95811	837 236 9699

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PETITION to Sacramento Mayor, City Council, and Planning Commission

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TO CITY: Please mail notices of hearings, staff reports, and documents regarding this project to the undersigned as follows:

Your Name	Address	City zip	Phone #, E-mail (OPTIONAL)
Maria Leticia	515 P St	Sacramento	352 652 5538
Bonnie Danker	515 P St	Sac.	916-446-6515
Karin Vallejo	7609 S Circle Pkwy	Sac	916 651-5633
Elizabeth Campbell	5701 Road Dr. Rocklin	95677	916-625-9155
Liliana Verdín	1013 Guerrero Ln.	Woodland 95746	(530) 908-6176
Danielle Jacques	445 Pst Sacramento CA		(916) 708-1334 (V)
Veronica Kaufman	1510 18th St #1	Sac CA 95811	916-225-5574
Dorothy A. Perki.	1500 - 5th St	Sac CA 95814	916-370-3296
Miguel Schneider	2512 I Street	Sacramento, CA 95816	916-835-1200
Robin Reynolds	6839 Shoreboard Way	Sacto CA 95831	916 580 4256
Peggy D. B.	6th St	Sacto CA 95814	916-704-3360
Zhang Y. Lu	515 P St.		916-448-1381
Angela M. Aguirre	515 P St	Sacto 95814	530-990-1611
Maria J. Anderson	515 P St, Apt 213		916-905-9158
Walter C. Lawrence	842 Story Ridge Way	95843	916-508-5398
Marian F. Pineda	515 P St		916-371-7953

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PETITION to Sacramento Mayor, City Council, and Planning Commission

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TO CITY: Please mail notices of hearings, staff reports, and documents regarding this project to the undersigned as follows:

Your Name	Address	City zip	Phone #, E-mail (OPTIONAL)
MARTHA A. BARZCZ	APT #1204 515 P ST	SACRAMENTO	
DAVID R. RODAT	515 P ST, APT #418	SACTO	
SHIRLEY OKEY	514 P ST #408	"	916-22748
Joseph Garcia	515 P St #607	"	
Lill Decorde	515 P st. 1112	"	
Michelle	515 P St #905	"	
Angel M. Ramos, Jr	8433 Canal Estates Lane	Sac CA 95828	(916)
Catherine L. Brown	500 N St Unit 1210	Sac CA 95814	
Maria Jeffry	1591 3rd Street	Sac, CA 95814	
Yulan Zhao	" "	" "	
Kathleen Pennu	500 N St, Unit 609	Sac, CA 95814	
Lorette Carlsson	1500 7th St #14C	SAC	Sacramento
Jean Russell	" " #8A	SAC	
Lizmy Tjoelker	1406 5th St	Sac	
Louisa Stefanov	P.O. Box 1235	Sacramento, CA 95809	1235
Paulie Caruthers	490 Penhow Circle	Sac, CA	

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Your Name	Address	City zip	Phone #, E-mail (OPTIONAL)
Maddalene Coran	600 I ST. Fair Sacramento CA		(916) 490-0976
Paul D. Wexler	7449 Sprucewood Dr Sacramento, CA 95831		(916) 391-7755
Mary Ann Millhone	515 P ST. Sacramento CA		
MARVIL BLAKE	ANTELOPE CA.		
SEAN KENNEDY	620 N Street Sacramento, CA		(916) 808-4742
Andy Jay	7659 El Rito Way Sacramento CA		(916) 447-3077
JOAN GRAY	27 CHANCY COURT ROSEVILLE CA		(916) 705-5425
Michelle Wilson	5025 MONTZONITE AVE Carmichael		(916) 287-1509
Kevin Vinas	613 Blue Water Way		916-606-5538
Marion Oias			
Valerie Delaney	744 P St Sacramento CA		654 5163
Georgia Booleartian	515 P ST #1111 SAC 95814		448-1201
Lara Brown	1871 514 St		(509) 227-5753
Breannon Jeters	3613 Black eagle drive Antelope 95843		916-533-3073
Myrna Johnston	1557 5th St. Sac 95814		714-80 Myrnaston54@gmail.com
Robert Heenan	515 P St Apt #1217		442-2982

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cont.

PETITION to Sacramento Mayor, City Council, and Planning Commission

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Your Name	Address	City zip	Phone #, E-mail (OPTIONAL)
Kathy Garman	4912 "J" Alway	Sacramento CA 95823	916-612-7906 -cell
Dain Pallari	9163 Peito Della Way E6	CA 95624	
Robert Romero	1435rd Street, Apt. 17	Sacramento, CA 95814	
Ronaldo Calaza	2729 Klissemann Dr	Sacramento CA 95826	916-947-8997
Valerie Kennedy	4424 Middlebury Way	Mather, CA 95655	916-743-6447
Debbie McAlvey	800 CAPITOL MALL	SACRAMENTO, CA 95814	916 529-6008
Janet Mathole	P.O. Box 221755	Sacramento, Ca. 95822	916-213-1052
Anna Clark	415 Pst. Apt 203	Sacramento CA 95814	916 539-2400
Steve Redd	415 Pst Apt 300	SACRAMENTO CA 95814	916 539 6835
David Prasad	450 W. ST	SAC CA 95814	916-813-5514
Janna Frances	504 S St, Unit A	Sac, CA 95811	
Brod Worsh	1414 Sutherland Rd	Sac CA 95822	
Lou Dawn Bettencourt	2521 Watson St	Sac 95827	
Barbara Karen Padina	P.O. Box 162820	Sac, CA 95816	
James Palato	500 N St., #201,	Sac. 95814	
Patricia	791 Colony Court	95622	

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cont.

PETITION to Sacramento Mayor, City Council, and Planning Commission

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TO CITY: Please mail notices of hearings, staff reports, and documents regarding this project to the undersigned as follows:

Your Name	Address	City	zip	Phone #	E-mail (OPTIONAL)
María Kraper Vich*	work across from this- DO NOT DO THIS PROJECT P.O. B. 6005		95812		
Ashley Hywood	1500 7th St. #413		95814		
David Brown	2973 Violet Dr. West Sac		95811		
Joy L. Roberts	445 P St. #402		95814		
ANITA WILSON	WILSON				
LILIAN CASTILLO	P.O. BOX 1393, WEST SAC, CA 95805			916-583-1290	
Lydia Haley	515 P Street Apt. 614 Sac., CA 95814			(916) 801-4225	
Pablo Dilane	775 REVERE ST. APT. G SAC., CA 95818				
Scott Springer	637 CARDOSO DR GARDEN CT 95632			209 570 3565	
Roland Haley	515 P Street Apt. 614 Sac., CA 95814			(916) 768-9354	
Sherry Lynn	450 N. 20th. Sacto.		94229	916-833-4654	
Leslie Stadsbaugh	2511 FULTON SQUARE LN #11		95821		
Alex Bello	500 N Street Unit #303	Sacramento, CA	95814	(707) 480-5544	
WILLIE GUNAWANSON	450 N St	SACRAMENTO CA		(916) 215-1282	
Jing Williams	757 N St	Sacramento	CA	916-660-6957	
Komy Brooks	711 N St	Sacramento	CA	916-657-1588	

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cont.

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PETITION to Sacramento Mayor, City Council, and Planning Commission

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TO CITY: Please mail notices of hearings, staff reports, and documents regarding this project to the undersigned as follows:

Your Name	Address	City zip	Phone #, E-mail (OPTIONAL)
David Edwards	135 Bemmerly Way	Woodland	95695
SAMA CHUDHRY	3260 GUNDA WAY,	SACRAMENTO	95670
Koy Saekun	4510 Doan Ave	W.Sacto	95691
Arlene Dillman	PO BOX 312	N.H., CA	95642 95660
Roland Fong	7032 13th St	Sacto, CA	95831
Romonic Langdon	1432 Conrad way	Altamishigns	(95621
MURIEL OMBRA	515 P St # 812	SAC, CA	95814
Dixie Miller	10889 Stowport Way,	Rancho Cordova	95670
Chae Amaya	123 Arc Folsom	CA	95628
BRISTITE POWERS	515 P St	Sacramento CA	95814
Chry Rockwell	10594 Peter A	Deerfield BLD	WINTER CA.
Xu Fan	515 Pst Apt 915	CA	95814
Victims	1727 W Solap	Sacto	95811
Cynthia Hasting	3321 11th Ave,	SAC, CA	95820
Ramon Rivera	700 W St	Sac CA	95814
Esther Deloso	8963 Midway Oaks Dr.	Elk Grove	CA 95758

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O11-1 cont.

PETITION to Sacramento Mayor, City Council, and Planning Commission

Preserve Our Livable Downtown Housing: Say "NO" to the "Sacramento Commons" Project (Capitol Villas replacement)

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TO CITY: Please mail notices of hearings, staff reports, and documents regarding this project to the undersigned as follows:

Your Name	Address	City zip	Phone #, E-mail (OPTIONAL)
Janny Peane	5214 Lake Pleasant Dr Elk Grove	95758	jpeane07@yahoo.com
Christy Vayena	5245 MARK ROAD SAE CA	95823	(916)402-7768
Engelth Boushara	1500 7th ST		
Karen V. Co.	POPOFF Sade, CA	95819	916 201 2980
AA Wilk	3200 log Island St W Sacramento	95691	
	35th Camino Ct	95608	
Joe Robert	1945 5th ST.		916.769-9927
Benny Salgado	515 P ST		916-448-1340
	10981 JACKSON ST SAC	95830	
Fisher Rembus	5337 DAYCON WAY / Sacramento,	CA 95825	732-688-2274
JIAO QIU YUAN	2480 Geneva St #1, W Sac,	95691	916-325-9274
Victorik Pika	615 P. St. Sacramento, CA	95814	(760) 293-4563
Rosent Wilke	2197 Coffee Creek Way Plumas Lake	CA 95961	(530) 845805
RaeKay Patterson	2412 C. Hage Way Apt 23 Sacramento	CA 95825	(714) 817-1614 eda7raek@yahoo.com
Juan V. V. A.	1500 7th St Sacramento		
Brian Sobli	9430 Laguna Pointe Way Elk Grove, CA.	95758	

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PETITION to Sacramento Mayor, City Council, and Planning Commission

Preserve Our Livable Downtown Housing: Say "NO" to the "Sacramento Commons" Project (Capitol Villas replacement)

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TO CITY: Please mail notices of hearings, staff reports, and documents regarding this project to the undersigned as follows:

Your Name	Address	City zip	Phone #, E-mail (OPTIONAL)
Everlyn Wright			
Kelana Johnson	515 P St	Sacramento 95814	
& E Hernandez	515 P St	" "	95814
Monika Wilbur	515 P St	SACRAMENTO	95814
Maria Butare	515 P St	Sacramento	95814
Shirley Ingram	515 P St	Sacramento	95814
Patricia Andrade	515 P St	Sacramento	95814
Chrysis Perez	515 P St	Sacramento	95814
Marijo Hernandez	515 P St	SACRAMENTO	95814
James Gilbert	515 P St	SACRAMENTO	95814
Jill Decoste	515 P St	Sacramento	95814
Valentina	515 P St	Sacramento	95814
Jane McDearwith	515 P St 1108	" "	" "
Mary Dapprene	515 P St 613		
Stella Hoplar	515 P St 1101	Sac, Ca.	95814
Chantene Jacobs	515 P St 1215	Sacramento, CA	95814

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PETITION to Sacramento Mayor, City Council, and Planning Commission

Preserve Our Livable Downtown Housing: Say "NO" to the "Sacramento Commons" Project (Capitol Villas replacement)

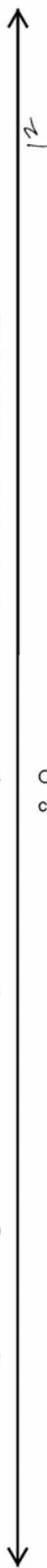
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TO CITY: Please mail notices of hearings, staff reports, and documents regarding this project to the undersigned as follows:

Your Name	Address	City zip	Phone #, E-mail (OPTIONAL)
MARSHALL HENRY	599 P ST.	SACRAMENTO 95814	916.595.2588 mrsphy916@gmail.com
BREATH BOURBEAU	1500 7TH ST	SACRAMENTO 95814	916 444-6417
Lorisa Stuppell	515 P ST #407	" "	
Clayton Roberts	2029 9th St	95814	712-5724
Carolina Hernandez	593 P St.	SACRAMENTO 95814	
Victor Ramirez	593 P St.	SAC	(11)
Robert Simms	1318 E St	SACTO	95814
GLORIA Jimenez	1530 4th	SACTO	916317-1014
Elean Rodriguez	1615 Q St.	SA	95811
Ponch Jones	956 Kings Canyon	Sac	95842
Francisco	400 P St	SACTO	916 795 9367
Mike	4110 P Street	Orto	916-795-0257
April Francisco	157 P "	" "	916 225 0175
John Martinez	515 P ST	" "	916 534-6655
Sammy Lee	9155 Argonaut	ELKTON	916-765-9501
Jennifer Posehn	3430 J St APT A	Sacramento	(916) 822-4219

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PETITION to Sacramento Mayor, City Council, and Planning Commission

Preserve Our Livable Downtown Housing: Say "NO" to the "Sacramento Commons" Project (Capitol Villas replacement) *PLD*

WE RESPECTFULLY ASK THAT THE CITY OF SACRAMENTO REJECT the current Application of Kennedy Wilson for its "Sacramento Commons" Project. We also ask that the City host meetings between the Capitol Villas owner and area residents to cooperatively formulate and implement a realistic win-win plan for Capitol Villas that would accomplish the goals of the City, the developer, and neighborhood while retaining the trees, park-like public green spaces, historically significant architectural design, and other features that have made this area so desirable for decades.

TO CITY: Please mail notices of hearings, staff reports, and documents regarding this project to the undersigned as follows:

Your Name	Address	City zip	Phone #, E-mail (OPTIONAL)
Tammy Scott	529 Q St.	SACRO 95811	fastlanefanny@gmail.com
Suzanne Setegalle	515 P St #1015	SACRO CA	Bonnie Setegalle bay M
RAYMOND SUTTON	515 P ST	SACRO CA	
Samantha Reyes	644 P St	SACRAMENTO, CA	
Rebecca Storey	705 C. Modmon St.	Folsom, CA	(916) 718-5296
Yvetta Dery	515 P St	SACRO, CA 95814	
Kata Oke	12640 Fekard Way	Auburn, 95603	
Machel Salazar	9285 Thilow Dr	Sacramento 95826	
Salvador Gonzalez	8898 wood Lily Way	ELK GROVE, CA	
Roberto John	515 P St	SACRO	916-408-9344
Swiley Nourgo-Cassal	722 Central Rd,	Dean 246 Sac.	916-657-4289
Juoy Sato	626 4th Ave,	SACRO, CA 95818	(916) 795-0420
Elene Monteverde	500 N St	Sacramento, CA 95814	(916) 595-4229
Dylan Beer	1309 Meiss Rd	Stoughouse 95623	(916)-764-8733
Stacey Fuljanson	614 N. St	Sacro, CA 95814	916-710-4146
Adrian Vivas	1391 los Padres Way	Sacramento 95831	916 600-6973

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PETITION to Sacramento Mayor, City Council, and Planning Commission

Preserve Our Livable Downtown Housing: Say "NO" to the "Sacramento Commons" Project (Capitol Villas replacement)

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TO CITY: Please mail notices of hearings, staff reports, and documents regarding this project to the undersigned as follows:

Your Name	Address	City zip	Phone #, E-mail (OPTIONAL)
La Phomsopha	13064 Borden Rd	Herald	95638
Tue Nguyen	576 Modena Way	Elk Grove	95624
Sanni Nam	2866 Vecchio Lane	Sacramento	95812
HONG TRUONG	8324 LAKE WILLOW WAY	FAIRFIELD	94533
Sue Aburimber	802 Seafarct	Lincoln	CA 95642
Jagati Marney	1416 Ninth St	Sacramento	CA 95814
Mike Rogers	5331 Moddison Ave.	Sacramento	CA-95819
Lori Little	2330 Quail Court	Fairfield, CA	94533
Steve Martarano	2956 23rd St.	Sacramento	95818
Chris Scabrough	9051 Montoya St #1	Sacramento	95826
Kathryn Stessier	1500 4th St	Sac	95814
Rachel Stewart	500 N ST UNIT 205	SAC	95814
Pamela Law	440 N Street	Sacto	CA 95814
Jeeka Vohra	450 N. Street	Sacto	CA 95814
Yasmin Vohra	450 N ST	SACRAMENTO, CA	95814
Enayati Vohra	2409 MANN CT	SAC	CA

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PETITION to Sacramento Mayor, City Council, and Planning Commission

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TO CITY: Please mail notices of hearings, staff reports, and documents regarding this project to the undersigned as follows:

Your Name	Address	City zip	Phone #, E-mail (OPTIONAL)
William Swift	2634 Kat Wilson St	Sacramento CA	916 320-1952
Rachel Jansz	687 P Street	Sacramento CA	916-817-8375 661-817-8375
Andre Harris	3312 Mensch Ct	Carmichael CA	95808 (916) 706-9772
ADRIAN	2615 E St.	SAC. CA.	95816 (916) 214-2254
PAUL WARRICK	3099 Benton St.	W. SAC	95691
Dorothy Messner	515 P STREET	95814	(916) 448 2299
Christine Flinders	500 N St. # 706	Sacramento CA	95814 Corokia@me.com *
DAVID FITCH	1517 Exposition	N. 17	95815 916 320-3415
Brenda A. Muntz	505 FRANEY WAY	95838	(916) 203-1793
Arq Khan	514 N Street	1	95814 916-327-8404
Hieu Tran	450 N Street		95814 916-445-2347
Curtis Stapp	1306 Fremont St	Woodlan	95695
Jessica Vinson	2101 Bidwell way	Sacramento	95818 (916) 862-7971
Marian Hunter	415 R St #511	Sacramento	95814
Nicole Solander	6050 Capitol Mall	Sacramento	95814
Robert Graham	450 N Street	Sacramento	95814 (916) 319-9923

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O11-1
cont.

PETITION to Sacramento Mayor, City Council, and Planning Commission

Preserve Our Livable Downtown Housing: Say "NO" to the "Sacramento Commons" Project (Capitol Villas replacement)

WE RESPECTFULLY ASK THAT THE CITY OF SACRAMENTO **REJECT** the current Application of Kennedy Wilson for its "Sacramento Commons" Project. We also ask that the City host meetings between the Capitol Villas owner and area residents to cooperatively formulate and implement a realistic win-win plan for Capitol Villas that would accomplish the goals of the City, the developer, and neighborhood while retaining the trees, park-like public green spaces, historically significant architectural design, and other features that have made this area so desirable for decades.

TO CITY: Please mail notices of hearings, staff reports, and documents regarding this project to the undersigned as follows:

Your Name	Address	City zip	Phone #, E-mail (OPTIONAL)
Debbie Blasdel	7909 Melfort way	95758	(916) 893-7578
JAMES HUNTER	650 CAPITOL, SACRAMENTO, CA		
Jeff Aldeghi	450 N ST	Sacto 95714	(916) 616-2705
Jim Chu	450 N ST	95714	916 372-2541
Marilyn Sykes	500 Capitol Mall,	Sac 95814	(916) 447-0700
Carolyn Atsches Brewer	500 Capitol Mall,	SAC 95814	916-624-2961
Kiara McIntosh	6639 Valley hi drive,	SAC 95823	916.667.1271
Earlene Gorman	400 McIntyre Ln,	Dixon 95620	916 324-2257
JUN PINEDA	5220 HIRSCOPF	ELC GROVE CA	916 997-2299
Davida Maitili	304S Staysail St.	Sac. 95833	916 833-2275
Donna Ray	6605 Blanner way	Hinda 95673	916 331-6927
NICOLE SULLIVAN	8704 BRIDGEMORE DR	SACRAMENTO 95824	916 710 4054
Harriet Miller	7321 Law Ct	Grayslake CA 95662	916
Sarah E. McArthur	#901-500 N St.	Sacramento	760 699 7093
Christi Wind	Clavis CA	93691	
Danli Rigale	2150 Whippoorwill Ln	95825	

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TO CITY: Please mail notices of hearings, staff reports, and documents regarding this project to the undersigned as follows:

Your Name	Address	City	zip	Phone #, E-mail (OPTIONAL)
Gwen Huff	5137 Butterwood Circle	Orangevale	CA	95662
BRINN GONZALES	3408 SILVERWOOD ROAD	WEST SAC	CA	95691
Therese Canning	792 Oakley Cir	Oakley	CA	95632
Madison Sacramento	4104 Street	CA		95108
Therese Canning	500 N ST	SAC	CA	95814
PEPPER HALL	10056 COMstock			916-514-9346
Sandra St. James	6652 Dorcen way	Sacramento		95823
MARK SUTER	450 N ST	SAC		916-324-2777
Heidi Andersen	450 N ST	SAC		916-322-3548
Michael Maves	1324 Firey Way	SAC		916 4854668
Michelle Pahl	2317 Brisalla St.	St Paul		55708
Amila Singh	2016 Bothwell Drive	SAC	CA	95829
Greg Aguilard	11400 Comfild Way	Elk Grove	CA	95758
Charles Krause	515 P. Street	#802 Sac	Cal.	916-730-0290
Rickie Church	2929 Hurley way	SAC	CA	95836
David Johnson	1436 Colton Pl St.	SAC	CA	916 710-9003

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TO CITY: Please mail notices of hearings, staff reports, and documents regarding this project to the undersigned as follows:

Your Name	Address	City zip	Phone #, E-mail (OPTIONAL)
<i>Hilbraith</i>	<i>515 P St.</i>	<i>315</i>	
<i>Resident</i>	<i>515 P St.</i>	<i>913</i>	
<i>Christiana Martinez</i>	<i>1519 D St</i>	<i>95814</i>	
<i>WAVE BLOWIT</i>	<i>1500 7th St.</i>	<i>95814</i>	
<i>LISA RAWLINSIN</i>	<i>5324 MARECON WAY</i>	<i>95808</i>	<i>916 807-2724</i>
<i>Sto Art</i>	<i>515 P St</i>	<i>95814</i>	
<i>Valeri Ojeda-herrera</i>	<i>1500 4th St</i>	<i>95814</i>	
<i>Steven German</i>	<i>1500-4th St</i>	<i>95814</i>	
<i>Tawna Carrington</i>	<i>515 P St</i>	<i>95814</i>	
<i>Linda Oettkupf</i>	<i>1500 5th</i>		
<i>Carmon Zamora</i>	<i>7345 Willowick</i>	<i>95822</i>	
<i>JADENE FALCETTI</i>	<i>5545 9th Hwy</i>	<i>95823</i>	
<i>Tina Co</i>	<i>515 P St #209</i>	<i>95814</i>	
<i>Linda in Stanley</i>	<i>515 P St #605</i>	<i>95814</i>	

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O11-1
cont.

17

PETITION to Sacramento Mayor, City Council, and Planning Commission

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TO CITY: Please mail notices of hearings, staff reports, and documents regarding this project to the undersigned as follows:

Your Name _____ Address _____ City zip _____ Phone #, E-mail (OPTIONAL) _____

- Martine Foster 621-24th St. Sacramento 95816
- Berlina Rio 515 P. St # 617 Sacto Ca. 95814
- Mr. W. W. W. 515 28th St. SAC. CA 95814
- Shanne Johnson 515 P St Sacramento Ca 95814
- Paul Meyer 1314 E St Sacto CA 95814
- John Stoddard 1500 7th St, Sacramento CA 95814
- D. Pine Montoya 1044 E. LANDING WAY, SACRAMENTO, CA 95831
- Red Bull 1515 Automobile Dr Yuba City 95999
- POSTART 1004 Wem jiong kong 95814
- Laverne Bush 6 Madant 95832
- Denise Sanders 600 Poston Dr Galt 95632
- Emilio Rivas 2272 Edgewater Rd. Sacto 95815
- EVA AUNEZ 515 P St - 95814
- WUJIEA LY 621 CAPITOL MALL, SACTO 95814
- TROY Rollins 700 17th St

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O11-1 cont.

RESPONSE TO COMMENT O11-1

This is a compilation of correspondences that have been compiled prior to release of the DEIR. These commenters mention the historic status of the site, the need for additional alternatives, affordability of housing, noise, historic architecture and landscaping, the loss of trees and tree canopy, aesthetics, traffic, density of existing development, the loss of green space, consistency with the General Plan, and crime.

Please see Master Response 2.3.4.1 for information on historic resources impacts under CEQA, Master Response 2.3.4.2 for a summary of the project's historic resources impacts, Master Response 2.3.4.3 regarding disagreement among experts in an EIR, Master Response 2.3.4.4 for additional mitigation considered for historic resources impacts, Master Responses 2.3.4.5 and 2.3.4.6 regarding consistency with the General Plan and related policy considerations.

Please refer to Master Response 2.3.7.1 for information on the purpose of EIR alternatives, Master Response 2.3.7.2 for information on the process used by the City to develop alternatives, Master Response 2.3.7.3 for information on alternatives rejected from detailed analysis in the DEIR, Master Response 2.3.7.4 for a summary of alternatives analysis, Master Response 2.3.7.5 for information on consideration of off-site alternatives, Master Response 2.3.7.6 for information on consideration of additional on-site alternatives, Master Response 2.3.7.7 for information on consideration of rehabilitation alternative, Master Response 2.3.7.8 for information on public benefit zoning as an alternative, Master Response 2.3.7.9 for information on alternatives to address less than significant impacts, and Master Response 2.3.7.10 for conclusion statements regarding the alternatives.

Please see Master Response 2.3.2.1 for information related to the existing setting, Master Response 2.3.2.2 for information related to tree removal, Master Response 2.3.2.3 for information related to the landscape plan, Master Response 2.3.2.4 for information related to aesthetic changes related to tree removal, Master Response 2.3.2.5 for information related to GHG sequestration benefits of trees, Master Response 2.3.2.6 for information related to project revisions to reduce removal of trees, Master Response 2.3.2.7 for information related to the City's significance determination related to tree impacts, Master Response 2.3.2.8 for information related to mitigation of tree-related impacts, Master Response 2.3.2.9 for information related to ecosystem services and tree growth calculations, Master Response 2.3.2.11 for information related to rooftop trees, Master Response 2.3.2.12 for information related to non-heritage trees, and Master Response 2.3.2.13 regarding other environmental benefits of trees.

Please see Master Response 2.3.3.1 for information about aesthetic changes not being significant impacts under CEQA, Master Response 2.3.3.2, for information about the focus of aesthetics analysis, Master Response 2.3.3.3 for information about scenic views, Master Response 2.3.3.4 for information about private views, Master Response 2.3.3.5 for information about visual changes associated with the project, Master Response 2.3.3.6 for site plan and design review for the project, and Master Response 2.3.3.7 for project revisions that reduce visual changes.

Please see Master Response 2.3.1.1 for information related to noise- and vibration-sensitive receptors, Master Response 2.3.1.2 for information related to the thresholds of significance used for noise impact analysis, Master Response 2.3.1.3 for information related to vibration impacts and mitigation, Master

Response 2.3.1.4 for information related to construction noise impacts and mitigation, Master Response 2.3.1.5 for the conservative approach to noise and vibration analysis, and Master Response 2.3.1.6 for information related to the duration of construction.

Please see Master Response 2.3.5 for a discussion of traffic impacts.

See Section 4.2 of the DEIR for a discussion of dust, including Impact 4.2-1 and Mitigation Measure 4.2-1, which is designed to reduce fugitive dust.

Please see Master Response 2.3.11 for information related to density of development. Please see Master Response 2.3.10.3 for a discussion of accommodating housing at different affordability levels.

Please see Master Response 2.3.2 for a discussion of the loss of trees and tree canopy. As discussed in the DEIR (see Section 4.10 in particular), there are City parks and other publicly accessible parks and urban open spaces located near the project site. To determine potential impacts to parks and recreational facilities, the DEIR considers relevant regulatory requirements of the City Code and General Plan for parkland requirements, parkland dedication requirements, and in-lieu fee requirements, based on the number of new dwelling units and residents that could be accommodated by implementation of the proposed project. To address parkland impacts caused by projects that generate additional resident and employee populations within the City, the Sacramento City Code provides standards and formulas for the dedication of parkland and payment of in-lieu fees (Title 16, Chapter 16.64), and imposes a park development impact fee on new projects within the City (Title 18, Chapter 18.44) for both residential and non-residential development. The proposed project will comply with its Parkland Dedication Requirement. The Sacramento Central City Urban Design Guidelines includes requirements to implement the 2030 General Plan and the Parks and Recreation Master Plan (PRMP) for small public spaces. According to the guidelines, new development should provide a range of open space types for its users and visitors, that are open to the street or public right-of-way and accessible to all citizens; and include hard and soft landscaping, areas for sun and shade, benches, and water features, where appropriate.

The proposed project provides a number of private recreation opportunities including pool areas for project residents and guests. Residential buildings include a podium or rooftop level pool area, and the parking garage included in Parcel 1 will also include a rooftop pool area. In total, the podium and rooftop level community space, fitness center and pool areas include approximately 1.7 acres of private recreation space. Additionally, each of the proposed buildings will have access to a fitness center and similar indoor recreation spaces. These indoor areas include approximately 0.20 acres of private recreation space. The corner of P and 7th Streets would be occupied by a community plaza of approximately 0.29 acres, accommodating pedestrians beneath a tree canopy. The proposed project also includes an East-West Promenade, North-South Promenade, and a central plaza, which provides a balance of hardscape paving lined with existing mature (Heritage) trees and new trees and open lawn and landscape in adjacent areas. The proposed promenades and central plaza also incorporate hardscape pedestrian paths, water features, seating areas, small café tables, public art, and softscape in the form of landscaping, such as shade and ornamental trees open lawn areas, and other landscape features. In total, the East-West Promenade, North-South Promenade, central plaza, and associated pedestrian paths cover 1.83 acres of the project site. The proposed project would not cause or

accelerate the physical deterioration of existing park facilities or require the expansion of existing parks in the area.

Please see Master Response 2.3.4.5 for information related to General Plan consistency.

Regarding the comment about crime, the EIR evaluates the potential environmental effects of the proposed Sacramento Commons project in accordance with the California Environmental Quality Act (CEQA) (Public Resources Code Section 21000 et seq.) and the State CEQA Guidelines (California Code of Regulations Section 15000 et seq.). The DEIR evaluates the potential physical adverse impacts on the environment resulting from implementation of the proposed project. Crime is not one of the topics addressed in the Appendix G “checklist,” which lists out each of the environmental topics recommended for analysis by lead agencies in CEQA documents. However, Section 4.10 of the DEIR, “Public Services and Recreation,” does include a comprehensive analysis of impacts related to the provision of police protection services.

As described in this section of the EIR, first response to the project site would be provided by Sacramento Police Department Central Command, which serves Downtown, Midtown, the Richards Boulevard corridor, and the Railyards. Central Command is located at 300 Richards Boulevard, approximately 1.4 miles north of the center of the project site. Implementation of the proposed project would result in increased demand for police protection facilities and services. During project construction there could be a temporary increase in demand for police protection services due to construction equipment stored on site that could be attractive for theft and vandalism, but the City has incorporated Mitigation Measure 4.10-2, “Implement Construction Security Measures” to ensure against any substantially adverse effects during construction (see DEIR, page 4.10-23).

COMMENT LETTER O12 – PRESERVATION SACRAMENTO



April 27, 2015

RE: Planning and Design Commission Comments for Sacramento Commons, P14-012

The Board of Directors of Preservation Sacramento urges the City of Sacramento’s Planning and Design Commission to follow the recommendations of the Preservation Commission and demand substantial changes to the Sacramento Commons development application, due to the technical inconsistencies and inadequacy of the EIR, land use issues and inconsistency with the City of Sacramento General Plan, and potential legal liability due to documented inadequacies.

O12-1

- The applicant claims in several places that there is somehow debate over the eligibility of the property as a historic resource. There is *no* real controversy over the eligibility of the property. Only the consultant paid by the applicant questions the eligibility of the property, and that consultant’s report was found inadequate when reviewed by local, state and national authorities and boards. This places the idea of controversy over its eligibility in the realm of climate change denial, or doctors who claim smoking does not cause cancer; the only ones holding that opinion are those paid to promote that opinion.
- The property was formally determined eligible for listing in the National Register of Historic Places, and only prevented from listing because of the owner’s notarized objection, which prevents listing in the National Register but not a determination of eligibility. It was subsequently listed in the California Register as the result of this determination. It is clearly eligible for the Sacramento Register due to its verified eligibility and the strength of the nominating documents.
- The Draft Environmental Impact Report (DEIR) explores four project alternatives. Only the “no project” alternative meets the requirements of the City of Sacramento’s General Plan, as the rest violate the city’s municipal code, Section 17.64.100, prioritizing *preservation of historic resources as a method to sustain and revitalize neighborhoods, enhance the city’s economic, cultural and aesthetic standing, its identity and its livability, marketability and urban character.*
- Because the three project alternatives presented assume any alteration of the property is a negative impact equal to 100% demolition, all three alternatives are technically inadequate as they are all set up to fail. The EIR’s conclusion that any new development on the site represents an unavoidable negative impact equal to complete site demolition is clearly false, as many nearby examples of new infill construction alongside historic districts or adjacent to historic buildings (including 700 K Street, R Street WAL, Tapestri Square etc.) demonstrate. As presented, the project alternatives represent *the most perverse possible* interpretation of provision of project alternatives; a deliberate avoidance of alternatives that simultaneously

O12-2

O12-3

O12-4

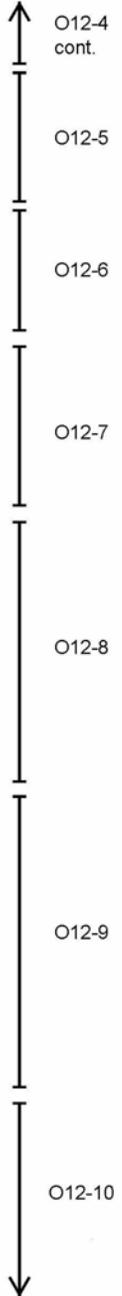


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achieve city goals regarding infill housing, historic preservation and retention of existing affordable housing stock.

- There are clearly ways to create new housing and infill development within a historic district in ways that meet the Secretary of the Interior’s Standards and City of Sacramento guidelines regarding infill in historic neighborhoods, including building on parking lots or the existing parking structure footprint. The developer has not explored any alternatives with this approach.
- The Preservation Commission’s comments on the EIR reflect the failure of the project to follow the city’s General Plan regarding historic resources. The city is obligated to consider the effects of proposed projects on historic resources, and Capitol Towers clearly qualifies. This project claims to support one part of the General Plan and city code while clearly violating another.
- Construction and piledriving activity is a potential negative impact on a nearby historic resource, the Heilbron House. The EIR minimizes the potential effects of piledriving on the historic building but other examples of piledriving near similar historic resources have resulted in negative impacts due to vibration and construction activity. There is no provision for mitigation of potential damage to the Heilbron House as a result of project activity.
- Completion of the project as proposed violates another element of the city’s General Plan, specifically the Housing Element’s instructions regarding affordable housing. Demolition of the garden apartments means the loss of 220 reasonably priced apartments that are affordable to working people at market rate, recently restored, currently inhabited and economically viable as they are currently built. The proposed replacement housing is far more expensive, meaning that those displaced by demolition would not be able to afford the new project’s rents. Thus approval of this project means a loss of affordable housing in the central city that can only be replaced by later public subsidy in another project.
- The City of Sacramento’s General Plan land use element prioritizes retention of existing affordable housing: see page H ES -3 of the Sacramento 2030 General Plan Housing Element, adopted December 17, 2013: “Recognizing the importance of preserving and maintaining existing housing resources, the City will pursue opportunities for targeted rehabilitation investment. Targets for rehabilitation funding will include properties in distressed neighborhoods with substantial blight; properties in areas with limited new growth potential, but where economic diversity is low; and properties left vacant due to foreclosure. In addition to this targeted strategy, the City will continue to promote the preservation of existing affordable housing citywide.”
- Based on the above criteria, Capitol Towers and Villas as it exists is not blighted and vacant, nor is it located in a part of the city with limited growth potential, as evidenced by the abundance of recent, underway and proposed projects in downtown Sacramento. The property’s rents are within affordability thresholds and provide economic diversity to the neighborhood. Thus there is no overriding reason to focus new development on the project site, and construction of the project would actually create greater income inequality in the neighborhood. The speculative



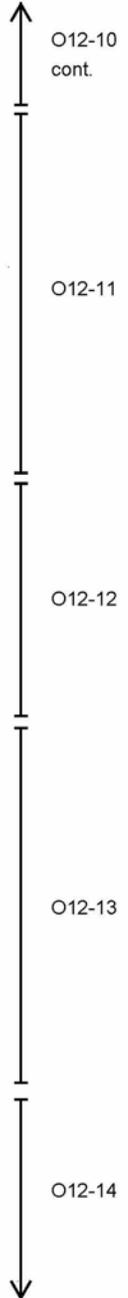


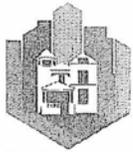
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nature of the project also creates the potential risk of blight if the project’s construction schedule does not match projections and the existing buildings fall into disrepair due to new owners’ intent to demolish them for future projects.

- The developer has claimed that a fundamental reason for the new project is the density of the existing Capitol Towers site, approximately 44 units per acre, compared to the property’s land use category that recommends a density of 60-450 units per acre. But this land use category is not a strict limitation on densities allowed in the site, and is intended as an aggregate of neighborhood density. When the other two properties on the “superblock” are included (500 N Street and Pioneer Tower) the overall density is 59 units per acre. By comparison, the downtown Entertainment & Sports Complex, a similarly sized development project under the same land use category, is planned for a maximum total density of 550 units, or 55 units per acre, and currently only 69 units of housing are planned for the site, less than 7 units per acre. This zoning category also includes office and commercial buildings with no residents. Thus, the existing density of Capitol Towers is not a barrier to its continued existence and viability.
- The existing Capitol Towers superblock is consistent with the goals of the city’s General Plan to increase central city population, and it is in fact the most densely populated neighborhood in the central city aside from the Main Jail. If the entire central city was populated to the same density as Capitol Towers, it would contain approximately 100,000 people, a threefold increase. Thus, the existing Capitol Towers site already embodies the principles expressed in the General Plan, unlike nearby vacant parking lots. Thus, the project proposed is unnecessary for the site to be consistent with the General Plan.
- The EIR has chosen not to explore off-site alternatives that would prevent adverse effects of historic resources, despite the project’s proximity to multiple large, vacant parcels and lots that contain no historic resources, are also zoned for high residential density, and are adjacent to transit lines. While the lead agency is not required to consider off-site alternatives, failure to do so gives an inaccurate perspective of the project and ignores the city’s existing commitment to protecting historic and cultural resources. Several nearby sites where potential off-site projects could be located include the ¾ vacant city block across the street from the site between 7th, 8th, O and P Street, the city block between 3rd, 4th, R and S Street, the city block at 3rd, 4th, L and Capitol, and the projected footprint of the Docks Project west of Front Street along the Sacramento River. All are currently zoned for high density residential development, close to existing or planned transit lines, and currently have no residents.
- The developer is not a builder, they are a real estate investment trust. They do not plan on being the builder of this property. This proposal is a Planned Unit Development, intended to entitle the land for high-rise use, not a formal development plan to actually construct the buildings. However, there is no long-term requirement for a subsequent purchaser of that land to follow the PUD if they decide that another use is more beneficial to them, they only need to submit a new plan to the city that could ignore this plan entirely by seeking new entitlements.





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Sacramento Commons is a “flip” of the existing property based on potential future value that sacrifices the existing, occupied, densely populated, well-maintained and economically viable apartment complex on the site so Kennedy Wilson can profit from the speculative future value of the land underneath the buildings.

- The city of Sacramento should not repeat mistakes of the redevelopment era, when the central city’s population was reduced from 58,000 in 1950 to 28,000 in 1970. This loss of population was primarily due to the deliberate destruction of existing neighborhoods, including recently built and economically viable buildings, in the name of higher-intensity urban development and urban renewal. The net result of redevelopment that indiscriminately destroyed existing housing was an enormous failure, with the notable exception of the project site, Capitol Towers. This site was the one location where high-density, modern, urban and transit-oriented housing was constructed, an award-winning project that is still economically viable in its current form.

In a city with such an abundance of surface parking lots, vacant lots, vacant office buildings and other opportunity sites already zoned for high density residential housing, there is an abundance of space for high-density residential housing in the urban core without resorting to the unnecessary and wasteful measure of destroying an existing neighborhood that embodies the principles of the General Plan in its current form. The developer must be instructed to return with an alternative plan that either utilizes another site or one that utilizes and enhances opportunity sites within the existing project area, such as building upon its parking lot or parking structure to increase residential density without destroying the existing neighborhood.

One potential alternative, proposed by Sacramento Modern and other groups, involves siting new mid-rise infill units on the existing Capitol Towers surface parking lots, and/or building a new high-rise tower incorporating an expanded parking structure on the existing Capitol Towers parking structure on 7th Street. This alternative would allow an increase in population density of the existing Capitol Towers superblock while avoiding demolition of the historic resources, whose restoration could be facilitated by use of the NPS Historic Preservation Tax Credit, or, assuming the legislation is passed and signed, the proposed California Historic Rehabilitation Tax Credit.

William Burg

President, Preservation Sacramento Board of Directors



RESPONSE TO COMMENTS O12-1 THROUGH O12-17

This is a reproduction of Comment Letter O7, except that Comment Letter O7 is addressed to Scott Johnson from the City's Community Development Department and Comment Letter O12 has the subject line, "RE: Planning and Design Commission Comments for Sacramento Commons, P14-012" and does not have an addressee. In the first comment, instead of "The Board of Directors of Preservation Sacramento urges the City of Sacramento to follow the recommendations of the Preservation Commission and reject the current Sacramento Commons Draft EIR..." as in Comment Letter O7, Comment Letter O12 starts with, "The Board of Directors of Preservation Sacramento urges the City of Sacramento's Planning and Design Commission to follow the recommendations of the Preservation Commission and demand substantial changes to the Sacramento Commons development application ~~reject the current Sacramento Commons Draft EIR...~~ The letter from the Sacramento Preservation Commission is included in this Final EIR with responses to each comment (see Responses to Comment Letter A6). In the second comment, Comment Letter O12 starts with, "The applicant claims," rather than "the EIR claims." The comments are otherwise the same and therefore the Responses to Comments are the same. Please see Responses to Comments O7-1 through O7-20.

2.2.3 INDIVIDUAL COMMENTS AND RESPONSES TO COMMENTS

COMMENT LETTER I1 – ADRIENNE KANDEL

Comments on the Draft EIR

Language plus the points of view shown in conceptual views do not make it clear that people living in the western 60 percent or so of the south-facing 500 N apartments will have a midrise 40 feet from their windows extending all the way to the west edge of the parking lot (as is clear from Figure 2.5). Instead it appears as if the midrise leaves them a window of visibility to the southeast. This occurs because Figure 4.1.9 is the only conceptual view that could show the barrier seen by south-facing residents, but instead it shows trees growing above the high-rise and as a result the viewer cannot see the building under the trees and thinks it's a green spot. This happens also to some extent in Figure 4.1.6.

I1-1

In fact, having a 75 foot tall building 40 feet from residences' only windows is unusual – I'm not finding that looking around the tall buildings in Sacramento. Most tall buildings are across the street and then up on the sidewalk, so closer to 80 feet away from each other – expect for the sides of a few nonresidential buildings that are next to each other. Therefore I contest the descriptor that "The changes in visual character or quality of the site are considered **less than significant.**"

You note that "the project site is developed and is surrounded by existing urban development, including high-rise development in downtown Sacramento," which is true. However, in all that high rise development residences have meaningful distance from their windows before the big shade, view-block, and wind tunnel of any tall building nearby.

The City planners should be made aware that while 40 feet is typical for 1 to 2 story residences having backyards facing 1 to 2 story residence backyards, it is not typical for 1 to 2 story residences' frontyards, which have setback then street (40 feet in itself) then setback again. They should be aware that for half the residents of the Bridgeway and Pioneer Towers, their front yard is the interior of the Sacramento Commons area – these apartments at least at Bridgeway face exclusively south.

I1-2

City planners also need to know that being 40 feet from a 75 foot tall building is in fact visually intrusive, not less than significant. They should decide what sort of precedent they want to set for infill. A reasonable ideal would have distance increase linearly with height of the building facing a residence, particularly a residence's windows and balconies that serve as their frontyard. For example, a linear equation could start with 40 feet for 2 story buildings and then increase in distance as building height increases.

I believe the final EIR should bring up this discussion item. In addition it should contain:

I1-3

1. A better conceptual drawing, such as one from a 2nd floor apartment facing the new building, or from the courtyard.
2. The history of why those buildings face that way so close to Capitol Towers buildings: The City of Sacramento had sold the entire multi-block lot to a developer who was supposed to build Capitol Towers as well as buildings like 500 N and Pioneer Towers on the edges. This is why the few Capitol Towers villas close to the edge of Capitol Towers face away from the edges and therefore away from the tall 500 N and Pioneer Towers buildings. When the Capitol Towers developer failed to build the edge buildings (500 N and Pioneer Towers), the City instigated a split of the property and a sale private parties who agreed to build those buildings. Accordingly,

I1-4

they were made close to Capitol Towers land as a way of implementing the urban plan of the time. It was not expected that tall buildings would come up 40 feet from the other towers.

I1-4
cont.

Appropriate edits would be:

3. You change the wording from, "The changes in visual character or quality of the site are considered **less than significant**" to something like "The changes in visual character or quality of the site are considered **significant for residents of lower floors of the adjacent properties of Pioneer and Bridgeway Towers. It is unusual in Sacramento for 75 foot tall buildings to be just 40 feet from the only windows and balconies of residences.**"
4. Another place to similarly change the wording would be under the segment on Impact 4.1.6. Your wording is, "The proposed project would change the existing visual character of the project site and would alter the building composition, landscape and certain views of, and through the project site compared to existing conditions. **However, the project site is already developed and is surrounded by existing urban development.**" More correct wording is, ""The proposed project would change the existing visual character of the project site and would alter the building composition, landscape and certain views of, and through the project site compared to existing conditions. **The project site is already developed and is surrounded by existing urban development, but in no such development are midrise buildings as close as 40 feet to residents' frontal view.**"

I1-5

I1-6

Adrienne Kandel

Owner of #707 of 500 N Street (Bridgeway Towers)

RESPONSE TO COMMENT I1-1

The commenter discusses privately available views from the 500 N Street apartments.

Commenter's concerns regarding private view impacts are noted and will be provided to the City Council as part of this FEIR for consideration. Please see Master Response 2.3.3.1 for a response on the City's obligations for aesthetic impacts under CEQA, Master Response 2.3.3.4, which addresses private views, Master Response 2.3.3.5, which provides information related to the DEIR visual impact analysis, and Master Response 2.3.3.7, which discusses changes to the project to reduce visual changes.

RESPONSE TO COMMENT I1-2

The commenter refers to the distances between buildings of different building heights.

Commenter's concerns regarding private view impacts are noted and will be provided to the City Council as part of this FEIR for consideration. Please see Master Response 2.3.3.1 for a response on the City's obligations for aesthetic impacts under CEQA, Master Response 2.3.3.4, which addresses private views, Master Response 2.3.3.5, which provides information related to the DEIR visual impact analysis, and Master Response 2.3.3.7, which discusses changes to the project to reduce visual changes.

RESPONSE TO COMMENT I1-3

The commenter requests a drawing from a second floor apartment or courtyard facing a new building proposed for the project site.

Please see Master Response 2.3.3.1 for a response on the City's obligations for aesthetic impacts under CEQA, Master Response 2.3.3.4, which addresses private views, Master Response 2.3.3.5, which provides information related to the DEIR visual impact analysis, and Master Response 2.3.3.7, which discusses changes to the project to reduce visual changes. In order to provide information for the public, the DEIR includes three dimensional conceptual illustrations providing a depiction of what the proposed project may look like at full build-out. The illustrations include some of the as existing development on the project site and portions of the adjacent project site's four-block area from specific vantage points (see DEIR pages 4.1-18 and 4.1-19). Additional drawings are not needed in order to assess visual changes attributable to the project for the purposes of this EIR.

RESPONSE TO COMMENT I1-4

The commenter provides historical information related to previous property subdivision and development.

This information provided by the commenter related to development history of the superblock and resident expectations are noted and will be provided to the City Council as part of this FEIR for consideration.

RESPONSE TO COMMENT I1-5

The commenter suggests edits to the text of the DEIR related to visual changes.

Commenter's concerns regarding private view impacts are noted and will be provided to the City Council as part of this FEIR for consideration. Please see Master Response 2.3.3.1 for a response on the City's obligations for aesthetic impacts under CEQA, Master Response 2.3.3.4, which addresses private views, Master Response 2.3.3.5, which provides information related to the DEIR visual impact analysis, and Master Response 2.3.3.7, which discusses changes to the project to reduce visual changes.

RESPONSE TO COMMENT I1-6

The commenter suggests additional edits to the text of the DEIR related to visual changes.

The DEIR discusses existing conditions and aesthetic changes associated with the proposed project. Commenter's concerns regarding private view impacts are noted and will be provided to the City Council as part of this FEIR for consideration. Please see Master Response 2.3.3.1 for a response on the City's obligations for aesthetic impacts under CEQA, Master Response 2.3.3.4, which addresses private views, Master Response 2.3.3.5, which provides information related to the DEIR visual impact analysis, and Master Response 2.3.3.7, which discusses changes to the project to reduce visual changes.

COMMENT LETTER I2 – BETTY LOUIE

My comments pertain to the Draft EIR for the Sacramento Commons Project. The proposed project's residential mid rise building, south of the 500 N Street building is described as five levels of residential on top of two stories of podium parking, altogether seven stories. I 12-1

Most of the residents at 500 N Street facing south only have windows facing south. There is no outdoor light coming into the unit from north, east or west. It is difficult to visualize how the north facade of Sacramento Commons Building 2B will affect the lower residents of 500 N Street, i.e. the height and the length of the proposed midrise 2B building adjacent to 500 N Street. I 12-2

Please include a drawing to scale of the mid rise residential and parking levels of Building 2B of the proposed project so that it shows the vertical and horizontal distances to scale in relationship to the south side of 500 N Street. I 12-3

For those of us on the lower floors on the south side of 500 N Street, the impact is not less than significant. Thank you. I 12-4

Betty Louie

RESPONSE TO COMMENT I2-1

The commenter provides information from Chapter 2 of the DEIR, the Project Description.

Please refer to Chapter 2 of the DEIR for detailed information about the proposed project.

RESPONSE TO COMMENT I2-2

The commenter notes that residents at the 500 N Street apartments have only south-facing windows.

Commenter's concerns regarding private view and light impacts are noted and will be provided to the City Council as part of this FEIR for consideration. Please see Master Response 2.3.3.1 for a response on the City's obligations for aesthetic impacts under CEQA, Master Response 2.3.3.4, which addresses private views, Master Response 2.3.3.5, which provides information related to the DEIR visual impact analysis, and Master Response 2.3.3.7, which discusses changes to the project to reduce visual changes.

RESPONSE TO COMMENT I2-3

The commenter requests a scaled drawing showing the vertical and horizontal distances to the south side of the 500 N Street building.

The DEIR discusses proposed building heights and setbacks between the proposed project and 500 N Street. Additional renderings and drawings are not necessary for the purposes of the DEIR. Please see Master Response 2.3.3.1 for a response on the City's obligations for aesthetic impacts under CEQA, Master Response 2.3.3.4, which addresses private views, Master Response 2.3.3.5, which provides information related to the DEIR visual impact analysis, and Master Response 2.3.3.7, which discusses changes to the project to reduce visual changes.

RESPONSE TO COMMENT I2-4

The commenter references visual impacts to residents on the lower floors of the south side of 500 N Street apartments.

Commenter's concerns regarding private view and light impacts are noted and will be provided to the City Council as part of this FEIR for consideration. Please see Master Response 2.3.3.1 for a response on the City's obligations for aesthetic impacts under CEQA, Master Response 2.3.3.4, which addresses private views, Master Response 2.3.3.5, which provides information related to the DEIR visual impact analysis, and Master Response 2.3.3.7, which discusses changes to the project to reduce visual changes.

COMMENT LETTER I3 – CARR KUNZE

Dear Chairman Nybo and members of the Planning & Design Commission,

Attached please find my comments in response to the DEIR for Sacramento Commons. The DEIR is a highly flawed document.

13-1

In these regards, please also carefully consider the comments of SacMod, the CA State Historical Resources Commission, the findings of the City of Sacramento's Preservation Commission, The National Trust for Historic Preservation, Preservation Sacramento, ECOS, Neighbors of Capitol Towers, and others who have expressed their concerns in regards to this proposal.

13-2

The comments of the commissioners of the respective City and State historical commissions were clear and incisive--they really 'got it'. They fully grasped the significance of this historical district in its entirety, and the importance of retaining its integrity for future generations.

13-3

I believe that initially, the City's staff and the City, were substantially misled by the Historical Resource Inventory and Evaluation of Capitol Towers Apartments prepared on behalf of Kennedy Wilson. This evaluation, now discredited by a subsequent survey, evaluation, and nomination by Page & Turnbull and the subsequent determinations of

13-4

the several City, State, and Federal historical resource or preservation commissions, likely led to false impressions as to Capitol Towers Apartments value to the City's cultural heritage. These impressions were likely formed and reinforced by a 2008 Historical Inventory and Evaluation of Capitol Towers by the same author for the Bond Companies, a prior applicant, and likely contributed to adverse actions resulting in increased planned densities in the City's General Plan revisions for this historical district.

↑
13-4
cont.

In addition to the historical resource considerations, please note the critical importance that Capitol Towers Apartments plays in having a diverse range of housing to serve ALL income segments in the City's core. Subsequent to these attached comments, I have found that after CADA--the City core's largest owner and operator of housing serving lower income (25% of units) with the balance serving moderate and middle income renter households (with some 780 units)--Capitol Towers Apartments (409 units), and Governor's Square (some 300 units) likely comprise the next largest resources for moderate and middle income households in the City's core. They, Capitol Towers and Governor's Square, would be substantially irreplaceable as the current and mid-to long term housing market continues to evolve subsequent to the consequences of the Great Recession. I have detailed this further in my response which is also based upon emerging findings and trends identified by national commissions, the State, the Harvard Joint Center for Housing and others.

13-5

I believe that there are meaningful, viable, alternatives. These have not been adequately explored by the DEIR. However, to appropriately develop these alternatives, and in consideration of the poor faith efforts of the applicant, the most effective method of developing a more collaborative and viable approach is to deny this application and to then convene a 'charette' group including stakeholders as well as neutral, design, feasibility, historic preservation and planning advisors. Comparable approaches have been used in other jurisdictions. Therein, consideration should be given to known as well as emerging planning tools, including 'Public Benefit Zoning' and Transferable Development Rights among others.

13-6
13-7

Thank you for your consideration of this matter,

Respectfully,

Carr Kunze

RESPONSE TO COMMENT I3-1

The commenter contends that the DEIR is a highly flawed document.

The EIR evaluates the potential environmental effects of the proposed Sacramento Commons project in accordance with the California Environmental Quality Act (CEQA) (Public Resources Code Section 21000 et seq.) and the State CEQA Guidelines (California Code of Regulations Section 15000 et seq.). The DEIR evaluates the potential physical adverse impacts on the environment resulting from implementation of the proposed project. The DEIR proposes mitigation measures and alternatives that may reduce or avoid the significance of such adverse impacts. The Final EIR provides responses to comments relating to the analysis provided in the DEIR. The purpose of an EIR is not to recommend either approval or denial of a project, but to disclose the potentially significant environmental impacts of a project and potential methods to mitigate those impacts. According to the State CEQA Guidelines (14 California Code of Regulations [CCR] Section 15064[f][1]), preparation of an EIR is required whenever a project may result in a significant environmental impact.

RESPONSE TO COMMENT I3-2

The commenter references other comment letters on the DEIR.

Responses to all comment letters received on the DEIR during the public review period and several provided after the end of the public review period are provided in this Final EIR, including those referenced by the commenter.

RESPONSE TO COMMENT I3-3

The commenter expresses agreement with the opinions of City Commissioners and undefined state historical commissions.

The comment does not raise specific questions or information regarding the adequacy of the environmental analysis provided in the DEIR. To the extent that the comment relates to historic resources impacts, please see Master Response 2.3.4.

RESPONSE TO COMMENT I3-4

The commenter alleges that City staff and decision makers were misled by historic resources analysis.

See Master Response 2.3.4.3 for a discussion of disagreement among experts relative to historic resources.

RESPONSE TO COMMENT I3-5

The commenter suggests that the current project site provides housing for all income segments in the City's core.

The comment does not raise specific questions or information regarding the adequacy of the environmental analysis provided in the DEIR, but is provided here for City Council consideration. Chapter 3 of the EIR, however, provides an analysis of housing in the Central City area, including housing cost. Please see also Master Responses 2.3.10.3 and 2.3.12.12, which address housing.

RESPONSE TO COMMENT I3-6

The commenter suggests that there are additional alternatives that have not been included in the EIR but does not identify such alternatives.

See Master Response 2.3.7 for a comprehensive response related to alternatives.

RESPONSE TO COMMENT I3-7

The commenter suggests the use of public benefit zoning or transfer of development rights.

See Master Response 2.3.7 for a comprehensive response related to alternatives. Please see Master Response 2.3.7.8 for a discussion of public benefit zoning. See Master Response 2.3.7.5 for a discussion of off-site alternatives, including the use of transfer of development rights.

COMMENT LETTER I4 – CARR KUNZE

CARR KUNZE

April 24, 2015

Re: Draft Environmental Impact Report for the Proposed "Sacramento Commons" Project (P14-012) (SCH# 2014042032)

Dear Mr. Johnson,

Thank you for the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the proposed Sacramento Commons Project (Sacramento Commons).

14-1

Please note as well that I fully embrace the comments of Sacramento Modern (SacMod) in their response dated April 20, 2015 to you regarding the EIR for this proposal. Their comments should be studied carefully and in their entirety. They are well researched, comprehensive, thoroughly thought through in relation to Sacramento's planning documentation and context and incisively 'spot-on'. I will add selected findings of my own to the historical context in Aesthetics and Cultural Resources below. In addition, these comments cover my observations and findings in regards to Land Use and Planning, Noise, Parks and Recreation, Transportation, and Population and Housing.

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14-3

Aesthetics and Cultural Resources

In addition to my earlier comments and those of SacMod, I again note that Wurster, Bernardi, and Emmons (WB&E) were the leaders in the mid 20th century of an architectural movement that came to be recognized as Bay Area Regionalism--or as properly, Northern California Regionalism, successors to which continue to this day. Importantly, Capitol Towers and Garden Apartments, represent not only a remarkably comprehensive environmental design for the

14-4

era, a planning first in the residential urban renewal context of California¹, but also an important extension of this movement's work into market rate, multifamily housing interpreted for Sacramento's and the Central Valley context.

Any loss of the underlying plan, its asymmetrical and thereby informal axial orientations in its principal spaces and secondary, informal, community spaces, together with its significant architectural character, features and tree cover would be a loss to the City and its visitors. It would be a loss as well to the planning and design professions and to California's architectural and urban design history.

Few cities in the US have such significant works of masters such as these², and have succeeded in retaining the types of urban spaces that were created by the urban renewal process and planning efforts of that era (Capitol Towers being unique in the character of such spaces). Whereas, Europeans have understood and preserved their planning masterpieces of this era: cities and planned communities of England (pre- and post-WWII garden cities, new towns, and London urban renewal sites), Germany (Hansaviertal, Berlin), and Scandinavia (Tapiola, Finland; Valingby, Sweden), represent an era when a hopeful world recovered from WWII with new ideas and humanistic principles for its cities.

The DEIR continues to make misleadingly irrelevant statements and innuendos repeating statements of the discredited JRP Historical Consulting, LLC's surveys.

The DEIR states that, "The Capitol Towers property, as a historic architectural resource, has not yielded and is unlikely to yield important information for history." This is patently false. The historic relevance has been established by the Page Turnbull survey, the City of Sacramento's, the State of California's and the National Keeper's findings and listings, together with the several endorsements by noted architects and architectural historians listed in SacMod's comments of April 20, 2015. I have noted other facts above and in the footnote below as to important relationships to history of that era and urban design significance that the property represents. As to whether it is likely to yield further important information for history, the research cannot be deemed completed. Indeed, the very relationships that I and others have pointed out in this and prior submissions regarding Wurster's, WB&E's and other participants in the project and the role of the project in housing design and planning as well as in extending

14-4
cont.

14-5

¹ Progressive Architecture, in awarding the project its First Design Award, characterized the project as "a herald of new directions in redevelopment planning . . . precedent breaking . . .", March, 1962, pg. 143

² Of over 150 urban renewal projects in the country, my research indicates that there are some 10 residential or mixed-use projects that are the works of architects of this caliber. Other than the WB&E team's Golden Gateway Center in San Francisco, a later, much different and more urbanized context,

² Of over 150 urban renewal projects in the country, my research indicates that there are some 10 residential or mixed-use projects that are the works of architects of this caliber. Other than the WB&E team's Golden Gateway Center in San Francisco, a later, much different and more urbanized context, none others of such caliber are in the West. Of the others, in the Midwest or East, 6 are by or include I.M. Pei, and 2 are by Ludwig Mies Van der Rohe. One other, a hospital / residential complex by Walter Gropius was recently torn down to become an empty site for Chicago's unrealized Olympics proposal.

concepts from the Garden Cities movement into new contexts, easily portend a relevance yet be further researched and documented.

↑ 14-5
cont.

Land Use & Planning

14-6

Please refer to my earlier Response of May 12, 2014.

The proposed development is already 'sustainably' oriented, provides a housing resource for moderate income workers, disabled, and senior households, and is thereby transit friendly enabling current households to walk and bike to work. The proposal is a perversion of these principles to the extent that it causes displacement of households away from the urban core, making them more reliant upon and consuming more transit or auto travel. The notion of transit friendly in-fill development should be that which is more removed from the central city, yet is proximate to bus and light rail (or within in easy biking and walking), such as the Railyards, R Street Corridor, and Township 9.

14-7

The original planned development including Pioneer and Bridgeway Towers, was conceived as a whole. Its intent was that of a PUD, though the zoning category likely was not conceived at the time. By restructuring that intent today, the City would be inferring that any existing PUD could also be restructured, and intensified—violating the open spaces and planning that existing residents and purchasers understood to be sacrosanct. The City would be putting its citizens and all PUD residents on notice that this potential would thereby exist.

14-8

As well, the original development, the current Capitol Towers, substantially meets the density intent of the current General Plan CBD areas when it is considered in the context of the entire superblock including Pioneer and Bridgeway Towers as the superblock was originally planned and developed. Confusion to planners and consequent misinterpretation was likely brought about when the individual parcels were examined separately, whereby Pioneer Towers and Bridgeway Towers were within the currently planned density ranges while Capitol Towers itself fell out of the current range due to a separation of parcels subsequent to what was envisioned in the redevelopment plan. Yet as referenced above, the three parcels should be considered in their originally intended whole. Thereby, Capitol Towers would not be considered as some form of underutilized and inconsistent parcel, as seems to be the perception and misinterpretation of Sacramento Commons proponents and DEIR preparers.

14-9

Thus, we have a case where the broad brush strokes of 'paint the block CBD red' in the General Plan process has precluded a sufficient understanding of the details, the intent, and circumstantial evolution of this particular superblock.

14-10

Noise Please see my comments of May 12, 2014 and those of SacMod and others in their current submissions regarding this DEIR. The DEIR fails to adequately address continuing, physically damaging impacts of noise over

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extended periods on existing residents in the area and the residents of Pioneer Towers in particular. The DEIR's mitigation proposals are inadequate and comprise loopholes constituting subterfuge. Moreover, based on my own prior direct experience residing adjacent to construction activities at the State Central Plant, clearly, the City can lack resources to adequately monitor and respond in a timely manner to noise infractions. The DEIR should ensure City has a strong mandate and the tools to reduce noise when complaints are made.

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14-12
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14-14

Parks and Recreation

DEIR measures of tree canopy losses due to the subject proposal are distorted. It also does not analyze or put in context losses that the City in abetting the State's actions, and contrary to its tree-scape principles, incurred in the recent re-development of the State's Central Plant adjacent to this site, at its location bounded by 7th, Q, 6th, and P Streets. Therein, about ¼ of the area of a city block of tree scape abutting Capitol Towers was recently lost. Sacramento Commons will perpetuate such losses.

14-15

The proposal's tree removals, with all of their negative environmental consequences noted by others, are only replaced with tokenism in the form of so-called 'vest pocket' parks—sensible where nothing existed before, but a sham when replacing an existing extensive, ground level tree-scape.

14-16

Transportation

The proposed development is not a sustainable, transit-friendly, proposal as alleged in the DEIR.

A number of recent studies have warned of some of the unintended and negative consequences occurring in 'Transit-Rich Neighborhoods'. A review of relevant recent literature and investigation was conducted by the Dukakis Center for Urban and Regional Policy of Northeastern University.³ Among their findings:

14-17

While patterns of neighborhood change vary, the most predominant pattern is one in which housing becomes more expensive, neighborhood residents become wealthier and vehicle ownership becomes more common. And in some of the newly transit-rich neighborhoods, the research reveals how a new transit station can set in motion a cycle of unintended consequences in which core transit users—such as renters and low income households—are priced out in favor of higher-income, car-owning residents who are less likely to use public transit for commuting.

³ Maintaining Diversity in America's Transit-Rich Neighborhoods: Tools for Equitable Neighborhood Change, Dukakis Center for Urban & Regional Policy, Northeastern University, pg. 1

In short, this and related studies suggest that the traffic impacts of the Sacramento Commons proposal (already suggested in the DEIR to further impact LOS to an F level, but which may have cumulative effects due to other subsequent densification rezonings, and which are not examined by the DEIR), may in fact be worse than analyzed in the DEIR.

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14-17
cont.

Thus, if the mid-rises and high rises as proposed by Sacramento Commons bring in a higher income population, then the projections used in the analysis understate the parking requirements as well as impacts on LOS on neighboring streets, and overstate transit use projected from the proposed project. Again, as stated in the Dukakis Center study, citing Purcher and Renne from a 2003 study,

14-18

“[i]ncome is the primary determinant of automobile ownership, which, in turn, is the main determinant of whether people drive or use transit.” In transit-rich neighborhoods in particular, one obvious indicator of undesirable gentrification would seem to be rising automobile ownership associated with the increase in incomes that accompanies gentrification.⁴

14-19

There are a number of emerging countervailing responses to the Transit-Rich Neighborhood and TOD phenomena that need to be examined and re-examined by planning staff before recommending any approvals of the instant proposal. The California Housing Partnership Corporation has recently released its “Preservation of Affordable Homes Near Transit Toolkit”. While much of this piece is oriented to affordable housing, it is applicable as well to the moderate income housing represented by Capitol Towers.

14-20

As well, the City and DEIR preparers should revisit the series on “Social Equity and Transit-Oriented Development: Selecting Transit Priority Areas in the Sacramento Sustainable Communities Regional Planning Process” sponsored by the UC Davis, Center for Regional Change and in which members of the Community Development Department staff participated. Closer examination of this document and process suggest that Capitol Towers is not and should not be a Transit Priority Area.

14-21

Population and Housing

The Housing Element and the General Plan process have not taken into account nor projected for losses from the housing stock and the impacts on moderate-income households resulting from displacement caused by the proposal or any similar proposals that may result from the GP’s re-designation of CBD properties as being eligible for density increases of upwards to 450 units per acre.

14-22

A housing needs analysis such as that prepared for the Housing Element (adopted 12/2013). should not only analyze population growth and household

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⁴ *ibid.*, pg. 20

formations, including formations by income level, it must also account for housing lost from the inventory, whether by fires or related causes, withdrawals due to substandardness or change in use, or demolition due to other renewal actions. This latter factor becomes particularly important when the City's plan raises densities with the intent of inducing redevelopment of several portions of the city's core containing older rental housing.

Under such latter circumstances, the City cannot claim to be planning for adequate housing when measuring only against household formations and not taking into account the consequences of its own planning actions.

Otherwise, and what is also referenced in the Housing Element, the City should be endeavoring to preserve this older segment of its housing stock which becomes an important resource for moderate income households that are not otherwise eligible for housing subsidies or when available, subsidies are rarely targeted to this income level, and yet for whom market rate housing constructed in the core and nearby areas would be beyond their means.

Recent major national housing studies (cf. Harvard Joint Center for Housing) have noted the mounting impacts of similar recent losses, nationally, on the rental housing stock and its moderate and lower income households.

The DEIR is non-responsive and attempts to minimize, incorrectly in terms of citing alternative resources, the human impacts and personal costs that will be incurred by displacing moderate-income households from the Central City. Moreover, it is likely that the proposal will result in ultimately changing the tenure characteristics of the towers portion of Capitol Towers. This fact is betrayed by references in earlier proposals of the applicant to potential conversion to condominiums or assisted living facilities. This is further evidenced by the continued proposal to eliminate the swimming pool that presently serves the towers, marginalizing current tenants and suggestive of pending use change.

More specifically, the City's Housing Element to the General Plan, "City Land Use and Urban Design Goals list:

Sustainable growth & change. Goals and policies address infill development, diversifying the City's housing stock, and increased transit and alternative transportation use. Other goals and policies promote a balanced housing mix within neighborhoods as well as development of housing for seniors.⁵

Elsewhere, a stated and repeated reference is made to the goal:

Include a mix of housing types within neighborhoods to

⁵ Housing Element, Section 1.5, General Plan Consistency, pg. H 1-5

14-22
cont.

14-23

promote a diversity of household types and housing choices for residents of all ages and income levels in order to promote stable neighborhoods;⁶

14-23
cont.

As will be detailed below, the Sacramento Commons proposal is a perversion of, and vitiates attaining any such goals. The DEIR fails to appropriately analyze and adequately address any mitigation of these impacts.

14-24

Sacramento Commons has the potential of displacing as many households in its 'super-block' area as had been displaced in the original (1959-1965) four block area redevelopment of Capitol Towers. This would have the effect of displacing a substantial number of households but without any of the benefits that would be otherwise available to them in a direct governmental action. While this displacement may be phased in the KW proposal, its consequences of breaking up an established community and dislocation of persons with limited resources in a time when rents are escalating at rates substantially disparate to increases in incomes (see recent joint white paper by Sacramento Housing Alliance and California Housing Partnership Corporation)⁷ would be comparable to the negative devastations wreaked by earlier urban renewal.

14-25

The DEIR claims the, "[p]roject construction would result in the **temporary loss** [emphasis added] of 206 market-rate rental housing units".⁸ This is a false and misleading allegation. The loss would be of moderate income serving housing units that would be replaced by units serving a higher income range. The loss would not be temporary. Units serving this income range are typically found in older segments of the housing stock. Units serving this income range would not be economically feasible to replace without subsidies. Subsidies serving this income range are not available.

14-26

For example, current rents for a 2-BR villas unit at Capitol Towers range between \$1,413 - \$1,651 per month. The average of these rents plus an allowance for utilities (\$70/mo)⁹ equals some \$1,602/mo. This amount serves a household income of some \$64,000 per year, almost exactly the City's current median income of some \$64,400 for a 3-person household—the typical occupancy measure for a 2 bedroom unit.

14-27

⁶ Housing Element, Section 3.0, Purpose, pg. H 3-1

⁷ How Sacramento County's Housing Market is Failing to Meet the Needs of Low-Income Families, May, 2014, by California Housing Partnership Corporation with Sacramento Housing Alliance, cf. www.chpc.org. The trends shown in this paper are equally applicable to moderate and middle income renter households. The 'trickle down' effects of the development proposal, would cause such displacement that it would in fact fuel a "trickle-up" impact of increasing rent inflation in the immediate area as well as more generally in the CBD and city, consequent further doubling-up of households and overcrowding, causing housing deterioration, and a demand for substandard housing elsewhere in the city.

⁸ Sacramento Commons Draft EIR, pg.3-33

⁹ Affordable housing rents are generally measured at 30% of gross annual income, including utilities.

Two years ago, Keyser Marston Associates prepared a memorandum for the City Community Development Department in connection with a Mixed Income Housing Ordinance update.¹⁰ At that time, their analysis suggested that an Urban Infill Apartment Project could generate rents of some \$2.00/square foot. Since then, development costs for both land and materials have escalated as have rents. Allowing for a 10% increase over the past two years¹¹, which is likely understated, rents for a 2 bedroom, 850 s.f. apartment would be \$1,870 which plus \$70 utility allowance would translate to some \$1,970/mo. This would have a threshold of affordability for households earning at least \$77,600 per year—20% above the current median income. In short, feasible rents for any newly constructed project would be Above Moderate Income.

14-28

Accordingly as well, it is difficult to believe that many of the moderate income serving (MI) units projected in Table H-2 of the Housing Element, particular those proposed for Township 9 (699 units) and the Downtown Railyards (1,284 units), could be feasibly developed without substantial additional subsidies—none of which is likely to occur in the near future.

14-29

Elsewhere, AECOM has claimed in its DEIR for the applicant that rents for 2-bedroom units in the Central City currently range from \$1,175 to \$3,267. This is an illusory and even preposterous demonstration. Nowhere has AECOM identified the number of vacant units available within this range, nor importantly within relevant rent or income brackets of the range. Moreover, it is preposterous inasmuch as the higher end of the stated range--\$3,267 is twice the high end of current rents at Capitol Towers villas. This latter amount, \$3,267 (plus utilities) would require incomes in excess of \$133,500 per year to achieve affordability.

14-30

14-31

Currently, the Capitol Area Development Authority (CADA), which owns and operates some 783 rental units, one of the largest operators of moderate income serving housing in the Central City, has NO VACANCIES. When available, their 2-BR market rents have typically ranged between \$800 - \$1,400 per month (one of their 42 properties has 2-BR rents as high as some \$2,300 per month). Of CADA's inventory, 25% of their units are targeted to lower income households, the balance, 75%, are effectively market rate. Thus, as can be seen, CADA's units are otherwise the primary alternative source for moderately priced housing in the Central City, and they have no vacancies.

14-32

Another nearby rental property comprising 300 units, currently has 9 vacancies, representing a 3% vacancy rate: well below a normal market allowance of 5%.

14-33

¹⁰ "Market Survey & Financial Feasibility: Mixed Income Housing Ordinance Update", Keyser Marston Associates, Inc., February, 2013

¹¹ Comparative data for this period for Sacramento is not readily available. Nonetheless, recent reports have indicated that rents in the San Francisco Bay Area have escalated as much as 15% in the past year alone. Sacramento's housing market has been recovering more slowly, but as will be further demonstrated, vacancies are clearly tightening and rents have been increasing. Such analysis should be the responsibility of the applicant and City.

Two bedroom apartment unit rents in this development range from \$1,200 to \$1,350, again, within the moderate income rental range.

↑ 14-33
cont.

With what appears to be a less than 3% vacancy rate in the current overall urban core housing market, the prospect for adequate housing to handle households being displaced is dismal. Several overhanging factors from the 2008 financial meltdown and Great Recession have substantially impaired the housing market's recovery, and with added reference to that for Sacramento. The construction and development industry must recruit and retrain replacements for many workers who have left. Production disruptions and shortages in the many of the different supply channels must be overcome. Credit requirements have shifted added pressures from homeownership to the demand for rental housing.

14-34

California's lower income and moderate income housing needs had substantial deficits before the 2008 meltdown. These deficits were compounded by the Great Recession as housing production fell to historic lows over the past 8 years and greater disparities of incomes to rents grew. The list goes on. And, any pending demolition of existing moderate income housing in the urban core will only add greater pressure to rents of that portion which remains, likely pushing that remainder beyond its current service population. This will be wholly contrary to the goals of the City's Housing Element: to preserve housing for a wide variety of incomes.

Thus, given the increasing tightening of the housing market, to allege that there would be adequate housing in or about the city's core is, to repeat, preposterous.

Under a governmentally sponsored redevelopment effort of the scale proposed by Kennedy Wilson at Sacramento Commons (Capitol Towers and Garden Apartments), a substantial amount of analytical effort would be required to determine the displacement impacts of any such redevelopment together with a relocation plan to accommodate households proposed to be displaced. The City or by extension, the developer, would be responsible for compliance with the Uniform Relocation Act and would be required to fund the costs of moving households so displaced together with any differential between the cost of comparable, reasonably proximate housing that the household is relocated to and the lesser of 30% (including the cost of utilities) of the household's income or the rent of the unit presently occupied by the household. This cost differential would be required to be covered for up to 3 1/2 years.

14-35

14-36

In addition, the relocation plan would have to survey housing in the market area and demonstrate the availability of such housing proximate to the current property. Traditional redevelopment planning would have included the development of alternative housing suitable for relocation in the absence of such housing being readily available. No such planning has been included in the City's housing element. These impacts are not mitigated by the DEIR.

14-37

By permitting Kennedy Wilson to undertake the redevelopment of the Capitol Towers complex while seeking to realize the upside economic development and tax benefits of renewal, the City would be abdicating its responsibilities to protect the interests of existing citizens that it would otherwise have had it been acting in a direct development or funding capacity through the application of any federal or state funds.

14-38

The promulgation of the Urban Relocation Act and its precedents stemmed from the dismal effects that earlier redevelopment efforts had upon defenseless citizens that were at the mercy of larger bureaucratic forces. Today, those forces take the guise of private efforts responding only to market conditions. However, the City has the power to either deny such development, to impose conditions, or end up being an enabler without regard to its other obligations to its citizens. Yet particularly when there are options available to the investor to develop without causing displacement, and when the market for the proposed development is not only questionable in terms of its scale as well as demand at the end of the market to which it is targeted, it should be considered that the proposal may dilute other market making efforts that the city has engaged in such as Township 9. And thereby, where there are direct, tax-payer funded investments, the City has a fiduciary obligation as well as a moral obligation to avert the many environmentally negative consequences of this proposal.

14-39

I had previously outlined in my September 5, 2014 Response to the NOP a threshold set of factors that need to be surveyed and analyzed. The Draft Environmental Impact Statement has failed to undertake any form of survey that would reasonably establish the impacts of the Sacramento Commons proposal and potential resources that should be brought to bear to off-set such impacts.

14-40

Again, this is the wrong concept in the wrong place when more appropriate revitalization of under-serving, poorly designed, and outdated office and other structures could be undertaken in areas immediate to the subject proposal. Rather, Capitol Towers needs to be preserved not only for its historical significance, but also to preserve a critical and difficult to replace moderate and middle income serving housing resource in the city's core, as well as to prevent the many other cumulative negative and significant environmental impacts that would be brought about by the proposal.

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14-44

Thank you for your consideration of these comments in regards to the Draft EIR for Sacramento Commons.

14-45

Respectfully submitted,

- s -

Carr Kunze

cc:

City of Sacramento Mayor and Council members
City of Sacramento Planning Commissioners

Evan Compton, Principal Planner
Roberta Deering, LEED Preservation Planner

Gretchen Steinberg, SacMod
Darryl Rutherford, Sacramento Housing Alliance
Jim Pacht, Judith Lamare, and Neighbors of Capitol Towers and Villas, and
Bridgeway Towers Owners Association
Judy Stanley, Pioneer Towers resident's representative
Kathleen Greene
Julie Mumma, NO Sac Commons
Kimberly Anderson, AIA Central Valley
Anthony Veerkamp, SF Field Office, National Trust for Historic Preservation

RESPONSE TO COMMENT I4-1

The commenter thanks the City for the opportunity to comment.

This comment is noted.

RESPONSE TO COMMENT I4-2

The commenter references other comment letters on the DEIR.

Responses to all comment letters received on the DEIR during the public review period and several provided after the end of the public review period are provided in this Final EIR, including those referenced by the commenter.

RESPONSE TO COMMENT I4-3

The commenter provides an introduction to the topics to be discussed in the comment letter.

The comment does not raise specific questions or information regarding the adequacy of the environmental analysis provided in the DEIR, and the City acknowledges this introduction.

RESPONSE TO COMMENT I4-4

The commenter offers background on architects involved in work at the project site, background on urban renewal, and related topics.

The comment does not raise specific questions or information regarding the adequacy of the environmental analysis provided in the DEIR. Commenter's opinion that any loss of loss of the historic structures or landscaping on the project site would be a loss to the City is noted. Information provided by the commenter will be provided to the City Council as part of this FEIR for consideration. See also Master Response 2.3.4 for a comprehensive discussion of historic resources as presented in the DEIR.

RESPONSE TO COMMENT I4-5

The commenter alleges that the DEIR is in error in summarizing information relating to Capitol Towers as an historic resource.

The discussion from the DEIR that the commenter is addressing concerns Criterion D from the National Register. Criterion D provides that a "[p]roperty has yielded, or is likely to yield, information important in prehistory or history." The National Register of Historic Places Registration Nomination Form prepared by Page & Turnbull does not mark that the property is significant because it has yielded, or is likely to yield, information important in prehistory or history. (National Register of Historic Places Registration Form, p. 7, DEIR Appendix D). Similarly, the National Keeper's determination of eligibility for Capitol Towers did not provide that the site is eligible under Criterion D. Therefore, the DEIR discussion of this criterion is not inconsistent with either Page & Turnbull's nomination form or the National Keeper's

determination. The commenter's disagreement with the conclusion in the DEIR is noted. Notwithstanding this disagreement, the DEIR finds that Capitol Towers is an historic resource and the DEIR evaluates impacts to Capitol Towers in consideration of its status as an historic resource. See also Master Response 2.3.4.3 for a discussion of disagreement among experts relative to historic resources.

RESPONSE TO COMMENT I4-6

The commenter references a previous letter written by the same commenter.

Responses to all comment letters received during the public review period and several provided after the end of the public review period are provided in this Final EIR, including those referenced by the commenter.

RESPONSE TO COMMENT I4-7

The commenter suggests that uses at the existing project site have benefits related to multi-modal transportation.

The comment does not raise specific questions or information regarding the adequacy of the environmental analysis provided in the DEIR. Please see Chapter 2 of the EIR and each of the technical sections of the EIR, including Section 4.11, which describes existing transportation conditions on the proposed project site. The purpose of the EIR is to disclose, mitigate, and find alternatives that reduce adverse physical environmental effects associated with the project. Additionally, as explained in the 2030 and 2035 General Plans, the City has determined that a number of sustainability benefits are realized through intensification of "development near transit and mixed-use activity centers, and locate jobs closer to housing..." (See, e.g., 2035 General Plan, p. 1-4). These sustainability benefits include "increased walking and reduced automobile use." In addition, "[g]asoline consumption, air pollution, greenhouse gas emissions, and personal commute times will be reduced, which will facilitate and increase the time working parents have to spend with their children and families." (*Ibid*). The proposed project is consistent with the 2030 and 2035 General Plans "grow smarter" sustainability objectives because the project site is located adjacent to transit, in a mixed-use area, and within the City's largest employment center. Please see also Master Response 2.3.10.3, which addresses housing.

RESPONSE TO COMMENT I4-8

The commenter provides background on the intent for earlier developments on-site and adjacent to the project site.

The comment does not raise specific questions or information regarding the adequacy of the environmental analysis provided in the DEIR. This comment is noted and will be provided to the City Council as part of this FEIR for consideration.

RESPONSE TO COMMENT I4-9

The commenter provides background on the intent for earlier developments on-site and adjacent to the project site and notes that Capitol Towers is not an underutilized or inconsistent parcel.

Pursuant to the 2030 and 2035 General Plans, density is evaluated in consideration of all parcels included in a proposed project. (See, e.g., 2035 General Plan, LU 2.1.4). The 500 N Street and Pioneer Towers parcels are not included in the proposed project. Including only parcels included in the proposed project, the current density of the project site is approximately 40 units per acre. Even if the density of 500 N Street and Pioneer Towers are considered, the superblock falls below the minimum residential density contemplated in the 2030 and 2035 General Plans of 61 units per acre. The existing density on the project site and on the superblock constitute relevant planning consideration for the City in evaluating the need for and merits of the proposed project. Please see Chapter 3 for a discussion of the consistency of the project with the City's General Plan and other relevant plans and development standards. See Master Response 2.3.11 for a discussion of density and Master Response 2.3.10 for a discussion of consistency of the project with the General Plan.

RESPONSE TO COMMENT I4-10

The commenter references the historic intent of development on the project site.

The comment does not raise specific questions or information regarding the adequacy of the environmental analysis provided in the DEIR and this comment is provided for City Council consideration.

RESPONSE TO COMMENT I4-11

The commenter suggests that the EIR fails to address noise impacts.

The DEIR includes a robust analysis and comprehensive reporting of short-term and long-term noise and vibration in Section 4.9. Please see Master Response 2.3.1.

RESPONSE TO COMMENT I4-12

The commenter suggests that the EIR mitigation measures have loopholes.

The comment does not suggest any specific issues with any mitigation measures. However, the City will adopt a reporting or monitoring program (MMRP) for mitigation measures included in the DEIR. The City has the discretion to choose its own approach to monitoring or reporting. The City will adopt a MMRP designed to ensure the effective implementation and enforcement of adopted mitigation measures. The MMRP also identifies the timing of implementation and the party/ies responsible for monitoring and enforcement. See Appendix B of the Final EIR, which includes the draft MMRP. See also Master Response 2.3.12.10 regarding construction noise mitigation.

RESPONSE TO COMMENT I4-13

The commenter suggests that the City does not have the resources to respond to noise infractions.

Please see Master Responses 2.3.1.4 and 2.3.12.10 for a discussion of construction noise.

RESPONSE TO COMMENT I4-14

The commenter suggests that the City should have a strong mandate and tools to address noise.

Please see Master Responses 2.3.1.4 and 2.3.12.10 for a discussion of construction noise.

RESPONSE TO COMMENT I4-15

The commenter alleges that estimates of tree canopy loss in the EIR are not accurate and references tree loss associated with a project located nearby.

Please see Master Response 2.3.2 for a discussion of the loss of trees and tree canopy. The comment refers to the loss of tree canopy and states that the EIR's assessment of the loss of the site's tree canopy is distorted because it does not take into account recent tree losses associated with nearby projects (e.g., Central Plant). The loss of tree canopy is addressed in the DEIR in Section 4.3, Biological Resources. The DEIR analyzes the cumulative impact to tree canopy in Section 4.3.4.

RESPONSE TO COMMENT I4-16

The commenter contends that proposed parkland is not sufficient.

Please see Master Response 2.3.2 for a discussion of the loss of trees and tree canopy. As discussed in the DEIR (see Section 4.10 in particular), there are City parks and other publicly accessible parks and urban open spaces located near the project site. To determine potential impacts to parks and recreational facilities, the DEIR considers relevant regulatory requirements of the City Code and General Plan for parkland requirements, parkland dedication requirements, and in-lieu fee requirements, based on the number of new dwelling units and residents that could be accommodated by implementation of the proposed project. To address parkland impacts caused by projects that generate additional resident and employee populations within the City, the Sacramento City Code provides standards and formulas for the dedication of parkland and payment of in-lieu fees (Title 16, Chapter 16.64), and imposes a park development impact fee on new projects within the City (Title 18, Chapter 18.44) for both residential and non-residential development.

The proposed project will comply with its Parkland Dedication Requirement. The Sacramento Central City Urban Design Guidelines includes requirements to implement the 2030 General Plan and the Parks and Recreation Master Plan (PRMP) for small public spaces. According to the guidelines, new development should provide a range of open space types for its users and visitors, that are open to the street or public right-of-way and accessible to all citizens; and include hard and soft landscaping, areas for sun and shade, benches, and water features, where appropriate. The proposed project provides a

number of private recreation opportunities including pool areas for project residents and guests. Residential buildings include a podium or rooftop level pool area, and the parking garage included in Parcel 1 will also include a rooftop pool area. In total, the podium and rooftop level community space, fitness center and pool areas include approximately 1.7 acres of private recreation space. Additionally, each of the proposed buildings will have access to a fitness center and similar indoor recreation spaces. These indoor areas include approximately 0.20 acres of private recreation space. The corner of P and 7th Streets would be occupied by a community plaza of approximately 0.29 acres, accommodating pedestrians beneath a tree canopy. The proposed project also includes an East-West Promenade, North-South Promenade, and a central plaza, which provides a balance of hardscape paving lined with existing mature (Heritage) trees and new trees and open lawn and landscape in adjacent areas. The proposed promenades and central plaza also incorporate hardscape pedestrian paths, water features, seating areas, small café tables, public art, and softscape in the form of landscaping, such as shade and ornamental trees open lawn areas, and other landscape features. In total, the East-West Promenade, North-South Promenade, central plaza, and associated pedestrian paths cover 1.83 acres of the project site. The proposed project would not cause or accelerate the physical deterioration of existing park facilities or require the expansion of existing parks in the area.

RESPONSE TO COMMENT I4-17

The commenter claims that the proposed project is not sustainable or transit-friendly based on part on a study of travel behavior of households based on income.

Please see Master Response 2.3.5.3 for a discussion of travel demand. This comment suggests that the traffic impacts of the proposed project may be worse than reported in the DEIR. The commenter bases this statement on a review of a report prepared by Dukakis Center for Urban & Regional Policy, Northeastern University “Maintaining Diversity in America’s Transit-Rich Neighborhoods: Tools for Equitable Neighborhood Change” (October 2010). The report documents research how the planned transit stations impact the development and weather there is a significant pattern of neighborhood change. The report mentioned above does not directly apply to the analysis provided in the DEIR since it is focused on the expansion of public transit systems, rather than on land use change. The trip generation for the proposed project analyzed in the DEIR is based on information compiled by the Institute of Transportation Engineers (Trip Generation Manual, 9th Edition, 2012 and Trip Generation Manual User’s Guide and Handbook, 9th Edition, 2012), the travel mode shares from the travel survey at the existing Capitol Towers apartment building (conducted in February 2008 and March 2008 at the site), and the Pre-census Travel Behavior Report: Analysis of the 2000 SACOG Household Travel Surveys (DKS 2001). The number transit trips were calculated based on the both surveys that accurately reflect the travel mode share for downtown Sacramento specifically. In addition to transit, walking, biking, and other non-auto travel mode share is expected to be higher downtown – many of the residents may be working within walking distance from their employment/business. Adding residential land use to the proximity of offices and retail, such as downtown setting, locate people closer to their destinations and allow for more walk, bike and transit travel. These factors are considered to the extent applicable in the DEIR. See Section 4.11 and Appendix H of the DEIR for more detail.

RESPONSE TO COMMENT I4-18

The commenter claims that if the project attracts higher-income households, the parking and level of service impact analysis may overestimate the share of trips made using public transit.

Please see Master Response 2.3.5.3 for a discussion of travel demand, Master Response 2.3.5.2 for a discussion of vehicular transportation. See also the Response to Comment I4-17, above. See also Master Response 2.3.5.1 for a discussion of parking. The comment states that the projections used in the analysis understate the parking requirements, as well as impacts on LOS, and overstate transit use projected from the proposed project. The percentage of project trips estimated to use public transit ranges from 2% to up to 6% of total trips, depending on the land use and time of day. This information is compiled by two surveys: travel survey at the existing Capitol Towers apartment building (conducted in February 2008 and March 2008 at the site), and the Pre-census Travel Behavior Report: Analysis of the 2000 SACOG House Travel Surveys (DKS 2001). It is a conservative approach to assessing the travel mode choice for a project and is well accepted methodology when preparing the traffic impact analyses.

RESPONSE TO COMMENT I4-19

The commenter provides information from a study of transit demand and income as a predictor of travel behavior.

Please see Master Response 2.3.5.3 for a discussion of travel demand, Master Response 2.3.5.2 for a discussion of vehicular transportation. The comment refers to Dukakis Center study (please see Response to Comments I4-17 and I4-18) that income is the primary determinant of automobile ownership and the choice of travel mode. The commenter recommends re-examining the Transit Oriented Development phenomena before the project approval. The comment does not relate to a potentially significant impact of the proposed project, but it is noted and included for City Council consideration.

RESPONSE TO COMMENT I4-20

The commenter references information related to household income and location.

Please see Master Response 2.3.5.3 for a discussion of travel demand. The commenter acknowledges the release of "Preservation of Affordable Homes Near Transit Toolkit" by the California Housing Partnership Corporation and suggests it is applicable to moderate income housing represented by Capitol Towers. The comment does not raise issues related to the adequacy of the Draft EIR. The comment is noted and included for City Council consideration. Please see Master Responses 2.3.10.3 and 2.3.12.12 for a discussion of accommodating housing at different affordability levels.

RESPONSE TO COMMENT I4-21

The commenter references information related to transit priority areas.

The comment states that Capitol Towers is not a Transit Priority Area basing the statement on “Social Equity and Transit-Oriented Development: Selecting Transit Priority Areas in the Sacramento Sustainable Communities Regional Planning Process” sponsored by UC Davis, Center for Regional Change. “Transit priority area” is a term defined by SB 743. Pursuant to SB 743, a transit priority area includes an “area within one-half mile of a major transit stop that is existing or planned...” (Pub. Resources Code, § 21099, subd. (a)(7)). The project site is located immediately adjacent to a major transit stop, the light rail station on 7th Street and O Street. Therefore, pursuant to CEQA, the proposed project is located in a transit priority area. In addition, Public Resources Code section 21155 sets forth the requirements for a project to qualify as a transit priority project (TPP). The City has determined that the proposed project is a TPP based on requirements, such as density, percentage of residential component of a mixed-use project, the proximity to major transit stop etc. Please see DEIR page 3-4, which provides information and a discussion about the qualification of the project as a TPP project and Chapter 4.0 (Subsection 4.0.3) and Chapter 6 includes numerous information and details about that subject. Please also see Master Response 2.3.9 for a comprehensive discussion of transit priority areas and transit priority projects.

RESPONSE TO COMMENT I4-22

The commenter provides a discussion related to population and housing.

The purpose of the EIR is to disclose, mitigate, and find alternatives that reduce adverse physical environmental effects associated with the project. However, the City provides a comprehensive discussion of population and housing that is related to the comment in Chapter 3 of the DEIR. Please see also Master Responses 2.3.10.3 and 2.3.12.12, which address housing.

RESPONSE TO COMMENT I4-23

The commenter references personal costs and human impacts related to moderate-income households in the Central City. The commenter also references material from the City’s General Plan.

The project applicant has acknowledged the potential for future projects to be proposed on the project site, such as changes to uses in Capitol Towers. However, the proposed project does not include any exterior modifications to Capitol Towers. A future project application would be required for the project applicant to pursue future changes to Capitol Towers. Such a future proposal would also be subject to Mitigation Measure 4.4-2 which requires, prior to commencement of any alterations or renovations to the existing Capitol Towers residential tower, the City Preservation Director review and confirm the renovations comply with the Secretary of the Interior’s (SOI) Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring & Reconstructing Historic Buildings or the SOI Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings unless this contributing resource is removed from the California Register of Historic Places.

The commenter states that Capitol Towers residents will not be provided access to a pool under the proposed project. While the existing pool area would be removed, the proposed project includes development of a pool area on the parking structure on parcel 1, which would replace the existing pool

and be available for use by residents of Capitol Towers and the mid-rise building proposed on parcel 4B.

The City provides a comprehensive discussion of population and housing that is related to the comment in Chapter 3 of the DEIR. Please see also Master Responses 2.3.10.3 and 2.3.12.12, which address housing. See also Master Responses 2.3.10.1 and 2.3.10.3 for a discussion of the project's consistency with the General Plan.

RESPONSE TO COMMENT I4-24

The commenter suggests that the proposed project would not achieve City General Plan goals.

See Master Responses 2.3.10.1 and 2.3.10.3 for a discussion of the project's consistency with the General Plan.

RESPONSE TO COMMENT I4-25

The commenter discusses the potential for the proposed project to displace households.

The purpose of the EIR is to disclose, mitigate, and find alternatives that reduce adverse physical environmental effects associated with the project. However, the City provides a comprehensive discussion of population and housing that is related to the comment in Chapter 3 of the DEIR. Please see also Master Responses 2.3.10.3 and 2.3.12.12, which address housing. See also Master Responses 2.3.10.1 and 2.3.10.3 for a discussion of the project's consistency with the General Plan.

RESPONSE TO COMMENT I4-26

The commenter suggests that the EIR reporting on the removal of 206 units and addition of new housing units is not accurate.

The purpose of the EIR is to disclose, mitigate, and find alternatives that reduce adverse physical environmental effects associated with the project. However, the City provides a comprehensive discussion of population and housing that is related to the comment in Chapter 3 of the DEIR. Please see also Master Responses 2.3.10.3 and 2.3.12.12, which address housing.

RESPONSE TO COMMENT I4-27

The commenter provides information about rents and incomes.

The purpose of the EIR is to disclose, mitigate, and find alternatives that reduce adverse physical environmental effects associated with the project. The commenter states that average rent for a two-bedroom Capitol Villas garden apartment is \$1,602. Rents of available apartments in buildings comparable to Capitol Towers (including the garden apartments) in the Central City ranged from \$1,175

to \$3,267 for 2-bedroom apartments.⁴ These rents are within the range of rents paid for the garden apartments at the project site (ForRent.com 2014). The City provides a comprehensive discussion of population and housing that is related to the comment in Chapter 3 of the DEIR. Please see also Master Responses 2.3.10.3 and 2.3.10.13, which address housing. See also Master Responses 2.3.10.1 and 2.3.10.3 for a discussion of the project's consistency with the General Plan.

RESPONSE TO COMMENT I4-28

The commenter provides information about rents and incomes.

The purpose of the EIR is to disclose, mitigate, and find alternatives that reduce adverse physical environmental effects associated with the project. However, the City provides a comprehensive discussion of population and housing that is related to the comment in Chapter 3 of the DEIR. Please see also Master Responses 2.3.10.3 and 2.3.12.12, which address housing. See also Master Responses 2.3.4.5, 2.3.10.1, and 2.3.10.3 for a discussion of the project's consistency with the General Plan.

RESPONSE TO COMMENT I4-29

The commenter provides information about other potential development projects and household incomes.

The comment does not raise specific questions or information regarding the adequacy of the environmental analysis provided in the DEIR, and this comment is included for City Council consideration.

RESPONSE TO COMMENT I4-30

The commenter identifies the range of rents for the Central City area reported in the DEIR.

The purpose of the EIR is to disclose, mitigate, and find alternatives that reduce adverse physical environmental effects associated with the project. However, the City provides a comprehensive discussion of population and housing that is related to the comment in Chapter 3 of the DEIR. Please see also Master Responses 2.3.10.3 and 2.3.12.12, which address housing. The range of rents in the Central City was based on a search prior to the release of the DEIR and references are provided for information presented in Chapter 3.

RESPONSE TO COMMENT I4-31

The commenter notes that the EIR does not identify the number of vacant dwelling units in the City and observes that the range of rents identified in the DEIR is a wide range.

⁴ For comparison purposes, the search did not include the L Street Lofts, a luxury condominium building with rental units.

The purpose of the EIR is to disclose, mitigate, and find alternatives that reduce adverse physical environmental effects associated with the project. However, the City provides a comprehensive discussion of population and housing that is related to the comment in Chapter 3 of the DEIR. Please see also Master Responses 2.3.10.3 and 2.3.12.12, which address housing. The range of rents in the Central City was based on a search prior to the release of the DEIR and references are provided for information presented in Chapter 3.

RESPONSE TO COMMENT I4-32

The commenter discusses demand for housing in the Central City area.

The comment does not raise specific questions or information regarding the adequacy of the environmental analysis provided in the DEIR and this comment is included for City Council consideration. The purpose of the EIR is to disclose, mitigate, and find alternatives that reduce adverse physical environmental effects associated with the project. However, the City provides a comprehensive discussion of population and housing that is related to the comment in Chapter 3 of the DEIR. Please see also Master Response 2.3.10.3, which addresses housing.

RESPONSE TO COMMENT I4-33

The commenter discusses demand for housing in the vicinity of the proposed project site.

The comment does not raise specific questions or information regarding the adequacy of the environmental analysis provided in the DEIR and this comment is included for City Council consideration. Please see Master Responses 2.3.10.3 and 2.3.12.12 for a discussion of accommodating housing at different affordability levels.

RESPONSE TO COMMENT I4-34

The commenter discusses demand for housing in the vicinity of the proposed project site and trends related to the economy, and suggests that there will not be adequate housing in the Central City area to meet demand.

The purpose of the EIR is to disclose, mitigate, and find alternatives that reduce adverse physical environmental effects associated with the project. However, the City provides a comprehensive discussion of population and housing that is related to the comment in Chapter 3 of the DEIR. Please see also Master Responses 2.3.10.3 2.3.12.12, which addresses housing.

RESPONSE TO COMMENT I4-35

The commenter discusses analysis related to the displacement of existing households.

The purpose of the EIR is to disclose, mitigate, and find alternatives that reduce adverse physical environmental effects associated with the project. However, the City provides a comprehensive discussion of population and housing that is related to the comment in Chapter 3 of the DEIR. Please

see also Master Responses 2.3.10.3 and 2.3.12.12, which address housing, and Master Response 2.3.12.8, which addresses displacement.

RESPONSE TO COMMENT I4-36

The commenter discusses the Uniform Relocation Act.

The purpose of the EIR is to disclose, mitigate, and find alternatives that reduce adverse physical environmental effects associated with the project. The project is not federally funded and not, therefore, subject to the requirements of the Uniform Relocation Act. However, the City provides a comprehensive discussion of population and housing that is related to the comment in Chapter 3 of the DEIR. Please see also Master Responses 2.3.10.3 and 2.3.12.12, which address housing, and Master Response 2.3.12.8, which addresses displacement.

RESPONSE TO COMMENT I4-37

The commenter discusses preparation of a relocation plan.

The purpose of the EIR is to disclose, mitigate, and find alternatives that reduce adverse physical environmental effects associated with the project. The project is not federally funded and not, therefore, subject to the requirements of the Uniform Relocation Act. However, the City provides a comprehensive discussion of population and housing that is related to the comment in Chapter 3 of the DEIR. Please see also Master Responses 2.3.10.3 and 2.3.12.12, which address housing.

RESPONSE TO COMMENT I4-38

The commenter states that the City has a responsibility to protect the interests of existing residents.

The purpose of the EIR is to disclose, mitigate, and find alternatives that reduce adverse physical environmental effects associated with the project. The project is not federally funded and not, therefore, subject to the requirements of the Uniform Relocation Act. However, the City provides a comprehensive discussion of population and housing that is related to the comment in Chapter 3 of the DEIR. Please see also Master Responses 2.3.10.3 and 2.3.12.12, which address housing.

RESPONSE TO COMMENT I4-39

The commenter discusses background related to the Uniform Relocation Act and the City's obligation to reduce environmental impacts associated with the project.

The purpose of the EIR is to disclose, mitigate, and find alternatives that reduce adverse physical environmental effects associated with the project. The project is not federally funded and not, therefore, subject to the requirements of the Uniform Relocation Act. However, the City provides a comprehensive discussion of population and housing that is related to the comment in Chapter 3 of the DEIR. Please see also Master Responses 2.3.10.3 and 2.3.12.12, which address housing.

RESPONSE TO COMMENT I4-40

The commenter references earlier NOP comments.

Comments on the NOP related to adverse physical environmental impacts were used, in part, to develop the scope of analysis of the EIR. The surveys referenced in the comment related to the previous NOP response are related to household incomes. The purpose of the EIR is to disclose, mitigate, and find alternatives that reduce adverse physical environmental effects associated with the project. However, the City provides a comprehensive discussion of population and housing that is related to the comment in Chapter 3 of the DEIR. Please see also Master Responses 2.3.10.3 and 2.3.12.12, which address housing. See also Appendix B of the DEIR, which includes all NOP responses, including the September 5th, 2014 response that is referenced in the comment.

RESPONSE TO COMMENT I4-41

The commenter expresses the opinion that the project is proposed for the wrong location.

The purpose of the EIR is to disclose, mitigate, and find alternatives that reduce adverse physical environmental effects associated with the project. The purpose of an EIR is not to recommend either approval or denial of a project, but to disclose the potentially significant environmental impacts of a project and potential methods to mitigate those impacts. Please refer to Master Response 2.3.7.5 for a discussion of off-site alternatives.

RESPONSE TO COMMENT I4-42

The commenter suggests that on-site structures should be preserved due to their historic significance.

See Master Response 2.3.4, which comprehensively discusses historic resources, and Master Response 2.3.7, which discusses project alternatives.

RESPONSE TO COMMENT I4-43

The commenter suggests that on-site structures should be preserved because it is difficult to replace moderate and middle income housing.

The purpose of the EIR is to disclose, mitigate, and find alternatives that reduce adverse physical environmental effects associated with the project. However, the City provides a comprehensive discussion of population and housing that is related to the comment in Chapter 3 of the DEIR. Please see also Master Responses 2.3.10.3 and 2.3.12.12, which address housing.

RESPONSE TO COMMENT I4-44

The commenter suggests that the project should not proceed due to cumulative and significant impacts.

The DEIR comprehensively analyzes and discloses project impacts and cumulative impacts associated with implementation of the project throughout Chapters 4 and 6 in the DEIR. The comment does not specify which impacts are of concern, but please refer to Master Response 2.3.4.6 for a discussion of the City's discretion to approve projects that have significant adverse environmental effects that cannot feasibly be mitigated to a less than significant level based on other project benefits.

RESPONSE TO COMMENT I4-45

The commenter thanks the City for consideration of comments.

This comment is acknowledged by the City.

COMMENT LETTER I5 – DAN PSKOWSKI

Sacramento Commons Project Comments

The Sacramento Commons project is bounded by 5th, 7th, N and P Streets. The tree inventory/ arborist report prepared by DUDEK lists 39 City Street Trees of which 4 are proposed for removal. These City trees should be mitigated by reimbursement to the City for the appraised value of the trees which are proposed for removal. There are 252 trees located on the project site of which 195 are proposed for removal. Removal of 77% of the on-site trees is excessive and the City should not allow the removal of this significant number of trees due to climate change. Serious climate change is inevitable when the carbon dioxide in the atmosphere exceeds 350 parts per million. Currently the level is 400 parts per million. Furthermore, 2014 was the hottest year on record in Sacramento since 1877. This is according to the Sacramento Bee's analysis of records from the National Climatic Data Center. *The average high temperature in downtown Sacramento last year was 78.7 degrees a full degree higher than the next hottest year. (Sac Bee Friday, Jan.9, 2015).* The average high temperature in 1878 was 71.9 degrees.

15-1

15-2

The DUDEK report lists that the proposed mitigation for the loss of this canopy will be the installation of 247 trees on-site of which 100 of those trees would be roof top trees. I don't believe there is adequate space to replant 147 trees due to the required adequate soil volume and growing space for any new trees to be planted in the approved project. Some of these replacement trees will be removed due to inadequate space i.e. roots causing infrastructure damage in 8 -20 years and are replaced with small canopy trees which will not mitigate the loss of leaf surface area. Furthermore, if there is space to plant 147 trees this is an indication that if the proposed structures were designed to incorporate the existing trees a lot of these trees could be preserved.

15-3

I'm pleased to see the DUDEK report included data of the ecosystem services [gross carbon sequestration, avoided runoff etc.] that the entire tree population provided. However, the report included the existing City street trees in their analysis and these public trees are protected and should not be included. When these trees are left out the loss of ecosystem services is sufficiently greater.

15-4

I would like to point out that the ecosystem services summary for the newly- planted ground-level trees [pg. 20 Table 6] is based on some false assumptions that the trees will grow and thrive. However, there are various examples in the downtown area where the replacement canopy/leaf surface area replacement has not even come close to replacing the loss of the existing trees removed for the project. One example is at 1300 "I" Street, State of California Attorney General Office Tower. This project is approximately 20 years old. The attached photos show that the London plane tree's canopy is sparse, providing very little leaf surface area compare to the existing elm that was preserved on the 14th Street side of the building. It should also be noted that these replacement trees were 36-inch box size.

15-5

This example stresses the importance of tree preservation over removal and replacement and the **significant loss of the ecosystem services that will never be mitigated** which should be addressed in the DEIR. In addition the loss of energy savings to the Capitol Towers, Bridgeway Tower, and Pioneer Tower residents due to canopy loss from the removal of the proposed 199 trees is not addressed in the DEIR.

15-6

15-7

Finally the social benefits that the existing trees provide to the existing residents Of Bridgeway, Pioneer, and Capitol Towers were not addressed in the DEIR. One example of social benefits as reported by the National Arbor Day Foundation has to do with health. A study conducted by Dr. Ulrich's of 46 gall bladder surgery patients showed that when patients who can see trees outside their room require less pain medication and on average spend 8% less time in the hospital than patients that could not see a tree from their room. Think of the social impact to all the residents when they look out their windows and no longer view the trees.

15-8

RESPONSE TO COMMENT I5-1

The commenter suggests that tree impacts should be mitigated through reimbursement to the City of their appraised value.

See Master Responses 2.3.2.3 and 2.3.2.8, which discuss tree mitigation.

RESPONSE TO COMMENT I5-2

The commenter expresses the opinion that tree removal associated with implementation of the proposed project is excessive and discusses global greenhouse gas concentrations, as well as temperatures in Sacramento.

See Master Response 2.3.2.5, which discusses greenhouse gas sequestration benefits of trees.

RESPONSE TO COMMENT I5-3

The commenter states an opinion that there is not enough room to accommodate 147 proposed ground-level tree plantings that some trees may require removal in 8 to 20 years, and that small trees may be used to replace removed trees in the future.

Please see Master Response 2.3.2.3, which describes the project's landscaping plan, and Master Responses 2.3.2.8 and 2.3.12.5, which describe tree-related mitigation. A landscape architect and arborist have confirmed that the proposed project can accommodate all 147 ground level trees included in the Conceptual Landscape Plan. The applicant has agreed to revise Mitigation Measure 4.3-2 to clarify that the proposed project is required to plant at least 147 ground level trees as part of the landscape for the proposed project. Please see also the Response to Comment O2-18.

RESPONSE TO COMMENT I5-4

The comment appreciates the analysis of ecosystem services for the site's trees, but states that City Street Trees should not be included in this analysis and that without inclusion of City Street Trees in the analysis, the ecosystem services loss is greater.

Exclusion of City Street Trees from the analysis has no effect on the time period needed for the post-development landscape to reach the existing condition. Please see Master Response 2.3.2.9 for more information concerning the inclusion of City Street Trees in the DEIR calculations and the resulting tree canopy if the trees are excluded.

RESPONSE TO COMMENT I5-5

The comments states an opinion that the growth projections for ground-level trees falsely assumes that the trees will grow and provides references to projects and representative site photographs indicating minimal tree growth on 20-year-old replacement trees.

The project references and images provided by the commenter do not represent the proposed project landscape. Specifically, the provided images show only streetscape trees that have been planted in small sidewalk cutouts, typically providing 9 to 16 square feet of growing space for a single tree. The proposed project landscape plan identifies tree planting locations primarily within the abandoned O Street and 6th Street walkways, areas that provide much larger growing spaces for trees. Please see Master Response 2.3.2.9 for information about growth calculations and Master Response 2.3.2.3 for a discussion of the landscaping plan.

RESPONSE TO COMMENT I5-6

The comment states that the loss of ecosystem services provided by the site's trees will never be mitigated.

The loss of trees and tree canopy is addressed in the DEIR in Section 4.3, Biological Resources and tree growth calculations for the project site indicate that the ecosystem services values currently provided (existing condition) will be reached in a period of 20 to 25 years based on implementation of the project's landscape plan (excluding podium and roof top trees). Please see Master Response 2.3.2.9 for information about ecosystem services and growth calculations, Master Response 2.3.2.3 for a discussion of the landscaping plan, and Master Responses 2.3.2.8 and 2.3.12.5 for a discussion of tree-related mitigation.

RESPONSE TO COMMENT I5-7

The comment states that the loss of energy savings for adjacent high rise buildings resulting from tree removal is not addressed in the DEIR.

See also the Response to Comment A6-12 for a discussion of the energy and GHG emissions associated with demolition and construction of the project compared to building energy efficiency and VMT associated with the proposed project.

RESPONSE TO COMMENT I5-8

The comments states that the social benefits of the site's trees is not addressed in the DEIR and provides a reference to a study indicating reduced medicine and hospital time necessary when trees are visible outside a patient's window.

The purpose of the EIR is to disclose, mitigate, and find alternatives that reduce adverse physical environmental effects associated with the project. Social benefits and impacts are not the focus of analysis in an EIR, but this comment is provided for City Council consideration. Furthermore, while private views will change as a result of the proposed project as discussed in the DEIR, existing 500 N Street, Pioneer Towers, and Capitol Towers residential units, as well as residential units in the proposed project will be able to see trees from their windows after development of the proposed project.

COMMENT LETTER I6 – JIM PACHL

Evan Compton

From: Jim Pacht <jpacht@sbcglobal.net>
Sent: Sunday, April 12, 2015 12:37 PM
To: David Nybo; Alan LoFaso; Jose Bodipo-Memba; Kiyomi Burchell; Cornelious Burke; Ed Chandler; Douglas Covill; Rommel Declines; todd.s.kaufman@gmail.com; Kim Mack; Matthew Rogers; Joseph Yee
Cc: Evan Compton; David Kwong; Scot Mende; Scott Johnson
Subject: Sac Commons: other pending infill projects
Attachments: Infill.pending.pdf

Dear Chairperson Nybo and Planning Commissioners,

In connection with the Sacramento Commons project, there has been considerable discussion of the City's desire to add a very substantial number of residential units within the Central City Community Plan area. So last year I compiled a list of residential infill projects in the permitting pipeline, entitled, under construction, or seriously proposed pre-application in the Central City CP Area or nearby neighborhoods. With a couple exceptions, all of these proposed projects are on obsolete industrial or commercial properties, or vacant or blighted properties; and would not tear up an existing successful residential neighborhood.

There are more than enough pending residential infill projects and additional vacant or blighted properties to meet the City's housing goals for the Central City CP area without tearing up the highly successful Capitol Towers and Villas.

Jim Pacht

I6-1

**PENDING RESIDENTIAL INFILL PROJECTS,
Central City Community Plan Area compiled by J. Pachl, 10/4/14**

This is a less-than-complete list of residential infill projects in permitting pipeline, entitled, under construction, or seriously proposed in or near the Central City CP area, based on my review of the City website and recent newspaper articles. The Central City Community Plan Area is bounded by the American and Sacramento Rivers, east side of Alhambra Boulevard, and south side of Broadway. (See Sacramento General Plan Housing Element p. H 3-7.)

Most of the projects below are on unused or underused former industrial or commercial properties, vacant lots, or blighted properties, with exception of a development project proposed for Marina Vista and Alder Grove public housing, for which no application has been filed. To the best of my knowledge, most of the individual project proponents are real developers. There are a number of other vacant or blighted properties within the Central CP area for which there are no project proposals at this time.

RELEVANCE to City's consideration of proposed Sacramento Commons - - there are plenty of residential infill projects and potential for much more without tearing up a very successful neighborhood, tree canopy, and urban green in the middle of downtown, such as the superblock bounded by 5th, 7th, N, and P St.

I. Central City Community Plan

River District Specific Plan - up to 8,000 housing units, including 2,500 units in the Township 9 project currently underway. Also includes potential redevelopment of Twin Rivers public housing project.

Railyard Specific Plan	10,000 – 12,000 unit entitlement
Kings Arena project	550
Metropolitan (10 th & J)	350
Former Clarion	
(700-16 th St)	160
7 th & H (SHRA)	150
Crystal Ice (16 th & R)	150
Whole Foods (2001 L)	140
700 K St	137
Eviva (formerly Warren)	118
Warehouse Artists Loft	116
515 T St	14
Legado (completed)	81
St Anton	65
La Valentina	81
Arbors	55
D & S (15 th & I)	80

16-2

16-3

16 Powerhouse	50
Suterview (2526 L St)	77
Creamery	98
Hall of Justice	42
1500 S St	70
Tapestry Square (complete.)	58
Maydestone Apt (rehab)	32
2500 R Street Townhouses	34
24 th & S St	5
20 th & S St	9

20,622 units subtotal of above

Additional

Third & Capitol: former Saca Twin Towers now owned by PERS partnered with developer CIM. Approved in 2005 for 804 condos, 200 hotel rooms. The future project may be smaller .

R Street corridor – other projects which I have not catalogued

The Docks – not yet determined

Various other smaller and intermediate projects which I have not identified, including single-lot duplexes, 4-plexes, townhouses, and small apartment projects scattered throughout the Central City CP area and nearby

II. Large residential projects close to Central City (partial list).

North West Land Park	800
(former Setzer site)	
Curtis Park Village	500 units
Curtis Park Court	91
McKinley Village	336
Sutter Park	120
(former hospital site)	

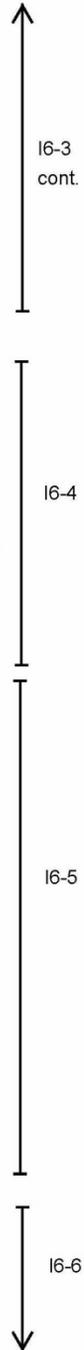
subtotal 1847

Alder Grove and Marina Vista – conceptual proposal for redevelopment of current single-story 750-unit public housing project which would add many market-rate units. Total ## of units contemplated is apparently undetermined at this time. Location is immediately south of Broadway. No application has been filed

There are others which I have not identified.

III. WEST SACRAMENTO near Downtown Sacramento (very partial list)

Bridge District:	4,000 homes	(under construction)
Capital Yards	270 units	(under construction)



There are other West Sacramento projects near downtown Sacramento which I have not researched or compiled. In addition, there is a substantial amount of other vacant or unused industrial land in West Sacramento designated for housing

↑
16-6
cont.

IV. SOME PERSONAL OBSERVATIONS

I must question whether there is or will be in the near future a large market of potential renters and condominium buyers willing to pay “upscale” rents or condo prices to live in or near downtown, even with an Arena nearby, when there is a large supply of for-rent or for-sale housing available at lower prices within the Sacramento area.

There are few families with children in downtown Sacramento multi-family housing. Most current and proposed new downtown residential projects have no features for children. In general, Sacramento families with children choose to rent or buy single-family homes or duplexes, if they can afford it.

16-7

The mainstay of the downtown workforce continues to be middle-income civil servants, clerical, office and service workers who are reluctant to pay “upscale” rents or condo prices. I know of no of major new employers coming into downtown or near the Central City CP, besides Kaiser Permanente’s proposed medical offices (not hospital) on J St. The Downtown Arena would relocate existing Arena jobs from Natomas to downtown, and create a few more.

RESPONSE TO COMMENT I6-1

The commenter discusses goals of the City to add housing in the downtown area.

See Master Responses 2.3.4.5 and 2.3.10, which address consistency with General Plan policy and Master Response 2.3.7.5, which addresses off-site alternatives. The purpose of the EIR is to disclose, mitigate, and find alternatives that reduce adverse physical environmental effects associated with the project. However, the City provides a comprehensive discussion of population and housing that is related to the comment in Chapter 3 of the DEIR. Please see Master Responses 2.3.10.3 for a discussion of housing in the vicinity of the project site.

RESPONSE TO COMMENT I6-2

The commenter suggests that most recently proposed projects in and near the Central City area are located on used or underused land.

See Master Responses 2.3.4.5 and 2.3.10, which address consistency with General Plan policy and Master Response 2.3.7.5, which addresses off-site alternatives. The purpose of the EIR is to disclose, mitigate, and find alternatives that reduce adverse physical environmental effects associated with the project. However, the City provides a comprehensive discussion of population and housing that is related to the comment in Chapter 3 of the DEIR.

RESPONSE TO COMMENT I6-3

The commenter identifies housing projects proposed in the Central City area.

See Master Responses 2.3.4.5 and 2.3.10, which address consistency with General Plan policy and Master Response 2.3.7.5, which addresses off-site alternatives. The purpose of the EIR is to disclose, mitigate, and find alternatives that reduce adverse physical environmental effects associated with the project. However, the City provides a comprehensive discussion of population and housing that is related to the comment in Chapter 3 of the DEIR.

RESPONSE TO COMMENT I6-4

The commenter identifies projects proposed in the Central City area.

See Master Responses 2.3.4.5 and 2.3.10, which address consistency with General Plan policy and Master Response 2.3.7.5, which addresses off-site alternatives. The purpose of the EIR is to disclose, mitigate, and find alternatives that reduce adverse physical environmental effects associated with the project. However, the City provides a comprehensive discussion of population and housing that is related to the comment in Chapter 3 of the DEIR.

RESPONSE TO COMMENT I6-5

The commenter identifies a partial list of housing projects close to the Central City area.

See Master Responses 2.3.4.5 and 2.3.10, which address consistency with General Plan policy and Master Response 2.3.7.5, which addresses off-site alternatives. The purpose of the EIR is to disclose, mitigate, and find alternatives that reduce adverse physical environmental effects associated with the project. However, the City provides a comprehensive discussion of population and housing that is related to the comment in Chapter 3 of the DEIR.

RESPONSE TO COMMENT I6-6

The commenter identifies a partial list of housing projects in West Sacramento.

See Master Responses 2.3.4.5 and 2.3.10, which address consistency with General Plan policy and Master Response 2.3.7.5, which addresses off-site alternatives. The purpose of the EIR is to disclose, mitigate, and find alternatives that reduce adverse physical environmental effects associated with the project. However, the City provides a comprehensive discussion of population and housing that is related to the comment in Chapter 3 of the DEIR.

RESPONSE TO COMMENT I6-7

The commenter provides personal observations related to housing and the labor force.

The comment does not raise specific questions or information regarding the adequacy of the environmental analysis provided in the DEIR and this comment is included for City Council consideration. Please see Master Responses 2.3.10.3 and 2.3.12.12 for a discussion of accommodating housing at different affordability levels.

COMMENT LETTER I7 – JIM PACHL

Evan Compton

From: Jim Pahl <jpahl@sbcglobal.net>
Sent: Monday, April 13, 2015 11:40 AM
To: Evan Compton; Roberta Deering
Subject: Fwd: Sac Commons 2/15/15 Preservation meeting
Attachments: NCTV4.10.15final.pdf; Infill.pending.pdf

FYI.

Jim

From: Jim Pahl <jpahl@sbcglobal.net>
Date: April 13, 2015 11:37:42 AM PDT
To: Caru Bowns <Caru.bowns@gmail.com>, kathleenforrest@hotmail.com, Mark Huck <mark.huck@parks.ca.gov>, jon.marshack@att.net, chad.moffett@meadhunt.com, Matthew Piner <pinerworks@sbcglobal.net>, eric@bbse.com
Cc: Judith Lamare <jlp@sbcglobal.net>, Gretchen Steinberg <sacramento@comcast.net>, Kathleen Green <kdgreenone@yahoo.com>
Subject: Sac Commons 2/15/15 Preservation meeting

Dear Chairperson Caru and Preservation Commissioners,

I am writing on behalf of Neighbors of Capitol Towers and Villas.

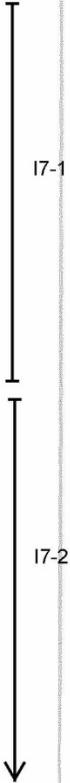
At your meeting on 2/15/15 the Preservation Commission will be asked to consider staff's proposal to vote to recommend to City Council the proposed Nomination of the Capitol Towers Historic District to the Sacramento Register of Historic Resources. (M15-001). Per previous email by Judith Lamare, Neighbors of Capitol Towers and Villas supports that Nomination.

At that same meeting you will also be asked to make a recommendation to the Planning Commissioners on the proposed Sacramento Commons project. (P14-12) The Planning Department staff recommendation is that you support the Sacramento Commons project, includes the demolition of the entire Capitol Towers and Villas Historic District except for the 15 story Capitol Tower. Neighbors of Capitol Towers and Villas urges the Preservation Commission to recommend against the approval of Sacramento Commons.

Please read and consider information in the ATTACHED documents addressing the Sacramento Commons project

1. Letter of Neighbors of Sacramento Towers and Villas, April 10, 2015, addressed to the Planning Commissioners
2. Document titled "Pending Infill" project", 10/4/14, compiled by me, which I emailed to the Planning Commissioners yesterday. As you can see, there are many more residential infill units seriously proposed or in the approval pipeline or under construction in or near the Central City Community Plan area than are needed to fulfill the City's residential infill goals for the Central City Community Plan Area. Most of those projects are not tearing out existing successful neighborhoods.

There are CURRENTLY 741 residential units in the 4-block superblock (Bridgeway, 134 units, Pioneer House 198 units, Cap Towers and Villas 409 units.) The CURRENT density is as follows: 741 units divided by 12.39 acres (bounded by 5th, 7th, N, and P Sreets) equals 59.8 units per acre.



The current density of 59.8 units per acre is very close to the 2030 General Plan goal of 61 units minimum per acre in the Central Business District. The City can achieve its infill housing goals for the Central City Community Plan area without tearing up the Capitol Towers and Villas Historic District.

↑
17-2
cont.

Jim Pachl
500N St #1403

RESPONSE TO COMMENT I7-1

The commenter asks the Preservation Commission to read the comment letter prior to providing a recommendation to the Planning & Design Commission.

The comment does not raise specific questions or information regarding the adequacy of the environmental analysis provided in the DEIR and this comment is included for City Council consideration. See Master Response 2.3.4 for a detailed response related to historic resources.

RESPONSE TO COMMENT I7-2

The commenter identifies that the existing site is close to achieving the minimum required residential density for the Central Business District General Plan land use designation.

The comment does not raise specific questions or information regarding the adequacy of the environmental analysis provided in the DEIR and this comment is included for City Council consideration. See Master Responses 2.3.4.5 and 2.3.10, which address consistency with General Plan policy, and Master Response 2.3.7.5, which addresses off-site alternatives. See also Response to Comment I4-9 regarding existing density on the project site.

COMMENT LETTER I8 – JIM PACHL

Evan Compton

From: Jim Pacht <jpacht@sbcglobal.net>
Sent: Tuesday, April 14, 2015 9:54 PM
To: David Nybo; Alan LoFaso; Jose Bodipo-Memba; Cornelious Burke; Kiyomi Burchell; Ed Chandler; Douglas Covill; Rommel Declines; todd.s.kaufman@gmail.com; Kim Mack; Matthew Rogers; Darrel Teat Jr.; Joseph Yee
Cc: Evan Compton; David Kwong; Scott Johnson; Steve Hansen
Subject: Sac Commons: Planning Comm. 4.16.15
Attachments: Ltr.Planning.Comm.JP.4.14.15.pdf

Please read my attached letter commenting on the proposed Sacramento Commons project that is to be discussed at the Planning Commission meeting of April 16, 2014.

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18-1
|

Thank you very much for the opportunity to comment.

Jim Pacht
500 N St #1403

April 14, 2015

James Pachl
500 N Street #1403
Sacramento, CA 95814
(916) 444-0910
jpachl@sbcglobal.net

Chairperson David Nybo and Commissioners
City of Sacramento Planning and Design Commission
300 Richards Blvd, 3rd Floor
Sacramento, CA 95811 delivered via email

Sacramento Commons: Comment and Review hearing
Commission meeting, April 16, 5:30 pm

Dear Chairperson Nybo and Commissioners,

I am an owner/resident of a condominium in the 15-story Bridgeway Towers (500 N Street), next to the proposed project site. Pioneer, and Capitol Towers, and Capitol Villas together comprise a 4-block street-free and pedestrian-oriented superblock, designed by renowned urban architects over 50 years ago as a single City redevelopment project. It is now a very successful high-density urban community (748 units) comprised of three high-rise towers and low-rise garden apartments, interspersed among open lawns, gardens, and a broad tree canopy. It is a shaded green “oasis” for the many office workers who pass through the area or come here for office breaks or lunch. The proposed project would eliminate most of the public green space, most of the tree canopy, and all of the historic low-rise garden apartments.

18-2
18-3
18-4

Some key issues which have not been adequately addressed are as follows:

1. The City should require KW to disclosure its market study.

Persons knowledgeable about the economics of Sacramento development have privately commented that the project is unrealistic, especially as to its timeline and economic feasibility of high-rise apartments and a new 24-story hotel in the downtown Sacramento market. KW says that it is relying on a market study which shows that the project is feasible, but refuses to share it even with the City.

18-5

In light of the failure of the Saca Twin Towers (iconic block-size hole) and the Aura project (large surface parking lot), the City has the responsibility to avoid approving projects having a likelihood of failure or extensive delay due to unrealistic or unsupported economic assumptions. This is especially so because Sacramento

Commons or post-demolition failure of Sacramento Commons would have detrimental impacts upon existing and highly successful high-density residential uses.

↑ 18-5
cont.

There is concern that disclosure of KW's market study would show its reliance on highly speculative or unsupported assumptions, and perhaps a development alternative that includes maximizing City development entitlements, demolition, maybe installation of backbone infrastructure, and sale of vacant parcels to others (investment funds or developers) for a profit without incurring the risk of huge construction debt and liability (particularly as to the high-rises). Considering KW's lack of experience in building anything from the ground up, the latter possibility looms large.

18-6

2. The City should impose conditions to prevent premature demolition prior to construction and to ensure site restoration in the event of project abandonment.

Most Applications for projects of this size include an experienced developer or developer partner with a track record of successfully undertaking large-scale projects. Proposed Sacramento Commons is a notable exception.

A disconcerting "red flag" is that Kennedy Wilson ("KW") is not a developer but is instead an out-of-town real estate investment firm which, as far as I can determine, buys, improves or remodels, and then sells large existing office, commercial, and residential buildings, but has never built anything from the ground up, except for being a partner with a major developer on a golf course 400-unit residential project in Hawaii (most of those prospective homes remain unbuilt). There are no developer or builder partners in the Sacramento Commons project. KW appears to have unrealistic expectations about the economic viability of its proposed parcelization and entitlements for development of its eleven-acre project area.

18-7

Unlike most other currently pending large projects in the Sacramento area, this will have major impacts on existing and adjacent residential uses whether it goes forward, or fails or becomes "dormant" after demolition or at early stages of construction (such as Aura and Twin Towers.)

A KW notice to its Capitol Tower renters, June 27, 2014, said that the low-rise garden apartments would be "phased out" over an estimated period of at least four years, and that construction would occur over an estimated period of at least six years. The project's most recent plan for phasing would demolish the low-rises by 2017, starting in 2015, and would complete construction in 2021. (Draft PUD pp 2-23, 2-24; DEIR pp. 2-22 thru 2-24)

18-8

In fact there is no reason to believe that the market for "upscale" (high end) apartments and condos in downtown would be broad enough within six or even sixteen years, to support KW's massive project, (over 1400 high-end apartment units). Especially

18-9
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unrealistic is KW's proposed "Phase One", which includes construction and completion of a 24-story hotel or condo building by August 2017. KW has no hotel partner and there is no foreseeable market for such a massive new upscale hotel in downtown, especially in light of City's approval of the proposed 250-unit Kimpton hotel at the Arena and the 135-unit Hyatt Place (former Marshall hotel), which have hotel partners, real developers, and are almost certain to be built. A 24-story condominium building might be feasible in the overheated San Francisco housing market, but is not economically feasible in the Sacramento housing market due to today's high cost of 24-story residential construction, relative to the incomes of the civil servants, office, clerical, and service workers, and retirees who comprise the mainstay of the downtown housing market.

18-9
cont.

If City approves Sacramento Commons, inclusion of the following project conditions are suggested to prevent a repeat of the Twin Towers and Aura debacles:

A. Demolition of existing structures, trees, and landscape on any individual parcel within the PUD area shall be prohibited unless the City Council first determines that there are legally binding contracts for all construction and complete financing of a City-approved project on the affected parcel, and that start of construction is imminent.

B. If a project is abandoned or fails after demolition, the developer shall restore the landscape on that parcel at developer's expense. A project would be deemed "abandoned" if construction did not start within six months of site demolition, or if construction started and then halted for more than six months. Before start of construction of a project, the developer shall post a bond for the full cost of restoring the landscape in the event of project abandonment.

C. Each phase of construction must be completed before demolition of structures, trees, and landscape commences for the next phase.

D. To discourage premature demolition on a project site, there shall be no "temporary" ground-level parking lots allowed atop a demolition site while awaiting construction of any individual project.

18-10

2. The forty-foot separation between walls of the proposed 8-story apartments and neighboring high-rise residential towers is an incompatible land use which will devalue the quality of life of residents and value of the impacted units

At its July 24, 2014 meeting, the Planning Commissioners asked for additional information on setbacks for proposed midrise buildings and their interface with Pioneer and Bridgeway Towers. (Staff Report p. 4.) An existing nonexclusive easement for pedestrian and recreational use forced KW to increase a portion of the setbacks to 74 feet but over half of the setback remains at 40 feet from Bridgeway and Pioneer Tower residences. Judith Lamare and I met with KW representative Dave Eadie, who firmly refused to widen the setback beyond 40 feet. He said that apartments next to the setback would face east and west, rather than northward, but that is not in the project documents.

18-11

It would provide more privacy but would not remove the negative impacts for Bridgeway residents deprived of light, air, and views.

The Planning Commissioners asked for renderings to help understand the appropriateness of the proposed 40-foot setback. (Staff Report p. 4, 12.) However the only ground-level rendering of the 40 setback between Bridgeway and the proposed 8-story midrise is obscured in the background of the illustration on page 33 of the draft PUD Guidelines. (The 74-foot easement-required separation is shown in the foreground and is nearly twice the width of the 40-foot separation.)

Proposed PUD Design Guidelines, (draft PUD p. 59) say that “sufficient distance between towers should be maintained to allow individual tower units, ground level units, and rooftop terraces access to sunlight and natural ventilation.” A 40 feet separation between an 8-story building and a high-rise would allow little or no sunlight to reach the lower floors.

There is no reason why this standard should not be applied to the distance between towers and neighboring 8-story mid-rise buildings, or between adjacent mid-rise buildings. The only plausible reason for the minimal 40-foot separation is Kennedy Wilson’s greed to maximize profits.

3. The landscape plan is illusory and unenforceable

In response to Commissioners’ concerns about the project’s destruction of most on-site trees, the developer has proposed a landscape plan which includes rooftop gardens that would include trees atop of buildings and parking podium. This is intended to mitigate for loss of most of the tree canopy. In addition the plan includes ground-planted trees where insufficient soil space would remain to support large trees.

However implementation of the landscape plan is unenforceable. There is nothing in the mitigation measures or project conditions would require the developer to actually construct and implement any part of the landscape plan, with the exception of the mitigation measure requiring replacement of removed Street Trees and Heritage trees, that are relatively small part of the tree canopy that would be removed. There is a local history of development projects which failed to install promised landscaping, and of defective developer-installed landscaping which failed. As an example, a number of developer-installed trees have been removed in Natomas because developers planted trees too close to house foundations and walkways, or planted tree species that were unsuitable for the site.

Even if the project proponents complete the landscape plan, the project documents give the City no authority to require that the developer or successor landowners retain or maintain that landscaping. This is especially problematic as to the proposed rooftop

18-11
cont.

18-12

gardens, which are expensive to construct and maintain, and are suitable for only a selected range of trees and plants. Rooftop gardens – which are essentially large planter boxes - cannot grow anything larger than small “lollipop” trees and shrubs due small soil volume. It should be noted that the present and past landowners of Capitol Towers and Villas have removed a number of large trees in recent years, and have not replaced them.

18-12
cont.

The landscape plan proposes to plant a row of trees next to the south-facing fence of Bridgeway, which is only five feet from Bridgeway’s swimming pool and hot tub spa. Those tree plantings should be set further back (southward) from Bridgeway’s pool and spa, so that the roots do not damage Bridgeway’s pool or spa and leaves and evergreen needles do not fall into Bridgeway’s swimming pool and hot tub spa.

4. The project will subject neighboring residents to unacceptable levels of construction noise and vibration for at least six years.

Kennedy Wilson shows its blatant disregard for nearby residents by proposing that construction – and unacceptable levels of construction noise – be permitted **seven days** per week, from **7am to 6 pm**, Monday through Saturday, and 9 am through 6 pm on Sunday. The acceptable standard for heavy construction activity in residential neighborhoods is Monday – Friday 8 am through 5 pm. The proposed “disturbance coordinator” (MM 4.9-3a) has **no authority** to stop work or fine contractors for violation of mitigation measures intended to protect neighboring residents. (DEIR p. 4-9-28, MM 4.9.3a.)

18-13

18-14

Residents of neighboring Pioneer Towers senior housing are retired seniors and disabled persons. Most suffer impaired mobility or other physical limitations which effectively confine them to the premises or immediate vicinity. Project construction noise will make life hellish for them. Some Bridgeway residents are in the same situation. If construction proceeds according to KW’s schedule, 2015-2021, (DEIR pp 2.22-2-24) residents of Pioneer Towers, Bridgeway Towers, Capitol Towers, and, to a lesser degree, residents of Pioneer House and Governor’s Square south of P St will suffer **six years** of almost continuous daytime heavy construction noise and vibration 7 days per week.

18-15

It is customary for residents to leave balcony doors open during the hot season for ventilation purposes. Construction noise will force residents to close their balcony doors during daytime, creating highly uncomfortable conditions during hot weather and/or increased costs for air conditioning

18-16

The DEIR’s claim that the impacts of construction noise on neighbors will be mitigated to less than significant (with residents’ windows closed) is a falsehood which is the opposite of the real-world experience of many people who live here.

18-17

The DEIR p. 49-24 says that 500 N St, Pioneer, and Capital Towers were built using concrete materials that would substantially reduce sound transmission. In fact most of the south-facing wall of Bridgeway Tower and one-half of the area of the north-facing wall of Pioneer Tower are comprised of conventional plate glass windows and sliding glass doors having minimal sound-reducing qualities.

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18-18
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Respectfully submitted.

James P. Pachl

RESPONSE TO COMMENT I8-1

The commenter asks the Planning & Design Commission to read an attached letter.

The comment does not raise specific questions or information regarding the adequacy of the environmental analysis provided in the DEIR and this comment is included for City Council consideration.

RESPONSE TO COMMENT I8-2

The commenter identifies his residence and that the existing project site was designed by architects more than 50 years ago.

The comment does not raise specific questions or information regarding the adequacy of the environmental analysis provided in the DEIR and this comment is included for City Council consideration. See Master Response 2.3.4 for a detailed response related to historic resources.

RESPONSE TO COMMENT I8-3

The commenter provides characteristics of the existing site, including lawn, gardens, tree canopy, and identifies that the project would eliminate most of the public green space, most of the tree canopy, and all of the garden apartments.

The comment does not raise specific questions or information regarding the adequacy of the environmental analysis provided in the DEIR and this comment is included for City Council consideration.

RESPONSE TO COMMENT I8-4

The commenter states that the project would eliminate most of the public green space, most of the tree canopy, and all of the garden apartments.

Please see Master Response 2.3.2 for a discussion of the loss of trees and tree canopy. As discussed in the DEIR (see Section 4.10 in particular), there are City parks and other publicly accessible parks and urban open spaces located near the project site. To determine potential impacts to parks and recreational facilities, the DEIR considers relevant regulatory requirements of the City Code and General Plan for parkland requirements, parkland dedication requirements, and in-lieu fee requirements, based on the number of new dwelling units and residents that could be accommodated by implementation of the proposed project. To address parkland impacts caused by projects that generate additional resident and employee populations within the City, the Sacramento City Code provides standards and formulas for the dedication of parkland and payment of in-lieu fees (Title 16, Chapter 16.64), and imposes a park development impact fee on new projects within the City (Title 18, Chapter 18.44) for both residential and non-residential development. The proposed project will comply with its Parkland Dedication Requirement.

The Sacramento Central City Urban Design Guidelines includes requirements to implement the 2030 General Plan and the Parks and Recreation Master Plan (PRMP) for small public spaces. According to the guidelines, new development should provide a range of open space types for its users and visitors, that are open to the street or public right-of-way and accessible to all citizens; and include hard and soft landscaping, areas for sun and shade, benches, and water features, where appropriate.

The proposed project provides a number of private recreation opportunities including pool areas for project residents and guests. Residential buildings include a podium or rooftop level pool area, and the parking garage included in Parcel 1 will also include a rooftop pool area. In total, the podium and rooftop level community space, fitness center and pool areas include approximately 1.7 acres of private recreation space. Additionally, each of the proposed buildings will have access to a fitness center and similar indoor recreation spaces. These indoor areas include approximately 0.20 acres of private recreation space. The corner of P and 7th Streets would be occupied by a community plaza of approximately 0.29 acres, accommodating pedestrians beneath a tree canopy. The proposed project also includes an East-West Promenade, North-South Promenade, and a central plaza, which provides a balance of hardscape paving lined with existing mature (Heritage) trees and new trees and open lawn and landscape in adjacent areas. The proposed promenades and central plaza also incorporate hardscape pedestrian paths, water features, seating areas, small café tables, public art, and softscape in the form of landscaping, such as shade and ornamental trees open lawn areas, and other landscape features. In total, the East-West Promenade, North-South Promenade, central plaza, and associated pedestrian paths cover 1.83 acres of the project site. The proposed project would not cause or accelerate the physical deterioration of existing park facilities or require the expansion of existing parks in the area.

See Master Responses 2.3.4.1 and 2.3.4.2 for information about historic resources.

RESPONSE TO COMMENT I8-5

The commenter suggests that the City should require the developer to disclose a market study.

The comment does not raise specific questions or information regarding the adequacy of the environmental analysis provided in the DEIR and this comment is included for City Council consideration. See Master Response 2.3.6.1 for a discussion related to market demand.

RESPONSE TO COMMENT I8-6

The commenter alleges that the undisclosed market study contains speculative analysis.

The comment does not raise specific questions or information regarding the adequacy of the environmental analysis provided in the DEIR and this comment is included for City Council consideration. See Master Response 2.3.6.1 for a discussion related to market demand. As discussed in Section 4.12 of the DEIR, infrastructure is available at the project site.

RESPONSE TO COMMENT I8-7

The commenter suggests that the City impose conditions related to project abandonment and suggests that the project applicant is not a developer.

The comment does not raise specific questions or information regarding the adequacy of the environmental analysis provided in the DEIR and this comment is included for City Council consideration. See Master Response 2.3.6 for a discussion related to construction phasing and economic viability.

RESPONSE TO COMMENT I8-8

The commenter discusses project phasing.

The comment does not raise specific questions or information regarding the adequacy of the environmental analysis provided in the DEIR and this comment is included for City Council consideration. See Master Response 2.3.6 for a discussion related to construction phasing and economic viability. See Chapter 2 of the DEIR for a comprehensive description of the proposed project, including anticipated phasing.

RESPONSE TO COMMENT I8-9

The commenter expresses the opinion that there is not sufficient demand to support the proposed project.

The comment does not raise specific questions or information regarding the adequacy of the environmental analysis provided in the DEIR and this comment is included for City Council consideration. See Master Response 2.3.6 for a discussion related to construction phasing and economic viability. See Chapter 3 of the DEIR for a discussion related to land use, population, and housing, including existing and future development in the Central City area. Please see Master Responses 2.3.10.3 and 2.3.12.12 for a discussion of accommodating housing at different affordability levels.

RESPONSE TO COMMENT I8-10

The commenter recommends a list of project conditions related to contracting, financing, demolition, and phasing.

The comment does not raise specific questions or information regarding the adequacy of the environmental analysis provided in the DEIR and this comment is included for City Council consideration. See Master Response 2.3.6 for a discussion related to construction phasing and economic viability. See also Master Response 2.3.12.9 regarding proposed mitigation relating to financial feasibility concerns.

RESPONSE TO COMMENT I8-11

The commenter discusses setbacks between buildings.

See Master Responses 2.3.3.1, 2.3.3.2, 2.3.3.4, 2.3.3.5, 2.3.3.6, and 2.3.3.7 for a discussion of visual changes associated with the project. See also Master Response 2.3.8 regarding existing nonexclusive easements on the project site. Please see also the Response to Comment O2-4.

RESPONSE TO COMMENT I8-12

The commenter claims that the project's landscape plan is unenforceable, that rooftop gardens can be used for certain types of trees, and that trees near Bridgeway Towers should be set back further.

The podium and roof top level trees included in the proposed project landscape plan are not required to mitigate tree related impacts caused by the proposed project. As discussed in the DEIR and Master Response 2.3.2, the EIR concludes that through planting of 147 ground level trees and implementation of Mitigation Measure 4.3-2, tree related impacts will be reduced to a less than significant level. See Master Response 2.3.2.3 for information related to the landscape plan and Master Responses 2.3.2.8 and 2.3.12.5, which address enforceable mitigation related to project impacts.

RESPONSE TO COMMENT I8-13

The commenter discusses construction noise and vibration.

See Master Responses 2.3.1.1, 2.3.1.2, 2.3.1.3, 2.3.1.4, 2.3.1.5, and 2.3.1.6 for a detailed response related to construction noise and vibration. See also Master Response 2.3.12.10 regarding construction-related noise mitigation.

RESPONSE TO COMMENT I8-14

The commenter contends that the disturbance coordinator does not have the authority to stop work or fine contractors.

See Master Responses 2.3.1.1, 2.3.1.2, 2.3.1.3, 2.3.1.4, 2.3.1.5, and 2.3.1.6 for a detailed response related to construction noise and vibration. See also Master Response 2.3.12.10 regarding construction-related noise mitigation and enforcement. The noise and vibration mitigation included in the DEIR will be implemented and enforced through the City's Mitigation Monitoring And Reporting Program and the measures will be conditions required for construction contractors. With implementation of the identified mitigation, impacts are considered less than significant.

RESPONSE TO COMMENT I8-15

The commenter discusses senior housing in the vicinity and the duration of construction.

See Master Responses 2.3.1.1 2.3.1.3, and 2.3.1.4 for a detailed response related to construction noise and vibration.

RESPONSE TO COMMENT I8-16

The commenter observes that residents in the vicinity leave their windows open during some times of the year.

See Master Response 2.3.1.4 for a detailed response related to construction noise, including information related to windows.

RESPONSE TO COMMENT I8-17

The commenter disagrees with the EIR's findings related to temporary construction noise impacts.

See Master Response 2.3.1.4 for a detailed response related to construction noise and Master Response 2.3.1.2 for a discussion of the significance threshold for construction noise impacts.

RESPONSE TO COMMENT I8-18

The commenter identifies that residences in the vicinity of the proposed project site have windows facing the proposed project site.

See Master Response 2.3.1.4 for a detailed response related to construction noise, including noise transmission through different materials, including windows.

COMMENT LETTER I9 – JIM PACHL

Dear Scott,

A member of the Bridgeway Towers Board of Directors brought to my attention California Fire Code § 903.3.5.2, ATTACHED, which requires a secondary on-site water supply of no less than 15,000 gallons, or greater if warranted by the calculations stated in that Fire Code section, for high-rise buildings. This is not mentioned in any of the Sacramento Commons project documents.

19-1

The Bridgeway Towers swimming pool also serves to meet that requirement for Bridgeway. I strongly suspect that the Capitol Towers swimming pool also serves to meet that requirement for Capitol Towers. Problem is that Kennedy Wilson plans to remove that swimming pool, which would result in non-compliance as to Capitol Towers. Do the swimming pools atop the other high-rises proposed for Sac Commons meet that requirement? I doubt it, based on the conceptual diagrams in project documents.

19-2

This requirement also applies to Group I-2 occupancies having occupied floors more than 75 feet above the lowest level of fire department vehicle access.
Does this apply to the 8-story midrise structures.

The EIR should explain how Sacramento Commons will meet the requirements of California Fire Code § 903.3.5.2, ATTACHED, including calculation of the gallonage required to be available on-site. That legal requirement exists even if the Sacramento Fire Department were to not enforce it.

19-3

Thank you very much.

Jim Pachi

sprinkler demand as required by NFPA 13R.

903.3.5.2 Secondary water supply. An automatic secondary on-site water supply having a *usable* capacity of not less than the hydraulically calculated sprinkler demand, including the hose stream requirement, shall be provided for high-rise buildings *and Group I-2 occupancies having occupied floors located more than 75 feet above the lowest level of fire department vehicle access* in Seismic Design Category C, D, E or F as determined by the *California Building Code*. An additional fire pump shall not be required for the secondary water supply unless needed to provide the minimum design intake pressure at the suction side of the fire pump supplying the automatic sprinkler system. The secondary water supply shall have a duration of not less than 30 minutes *or as determined by the occupancy hazard classification in accordance with NFPA 13, whichever is greater. The Class I standpipe system demand shall not be required to be included in the secondary on-site water supply calculations. In no case shall the secondary on-site water supply be less than 15,000 gallons.*

Exception: Existing buildings.

19-4

RESPONSE TO COMMENT I9-1

The commenter identifies a section of the California Fire Code related to secondary on-site water supply source.

As discussed in Section 4.10-2, the California Fire Code contains regulations relating to construction, maintenance, and use of buildings. Topics addressed in the code include fire department access, fire hydrants, automatic sprinkler systems, fire alarm systems, fire and explosion hazards, hazardous materials storage and use, provisions intended to protect and assist fire responders, industrial processes, and many other general and specialized fire-safety requirements for new and existing buildings and the surrounding premises. The California Fire Code contains specialized technical regulations related to fire and life safety.

According to the Fire Department, per 2013 California Fire Code Section 503 - Fire Apparatus Access Roads; 503.1.1- Approved fire apparatus access roads shall be provided for every facility. Roads shall extend within 150 feet of all portions of the facility and all portions of the exterior walls of the first story of the building. Every building will be required to meet 2013 California Fire Code and California Building Code and will receive a building permit upon meeting these requirements. Regarding the backup water supply requirements for fire suppression in high-rise buildings, 15,000 gallons is the Code minimum. If the location were to remove the swimming pool that was approved as the backup water supply, the building would be required to add a water tank or provide an approved second water supply in lieu of the pool (Tunson, pers. comm., 2015 and Lee, pers. comm., 2015).

There are many way for the developer and design team to comply with the requirement to provide a pumping source of 15,000 gallons of water (or volume required by Code formula per California Fire Code 903.3.5.2). As stated, swimming pools are a common way for projects to comply with this state requirement. Other methods include above or below ground tanks. These tanks can also be designed inside the building footprint, as done at Pioneer Towers. This is a standard requirement and is typically designed by the mechanical engineer or fire sprinkler consultant for the project. As stated in the DEIR, the proposed project is required to comply with this as well as all other applicable California Fire Code requirements. Furthermore, as discussed in the PUD Guidelines for the proposed project, each phase of the proposed project requires future site plan and design review. Project design for each phase will incorporate all features required by the California Fire Code and other applicable laws.

RESPONSE TO COMMENT I9-2

The commenter discusses removal of the Capitol Towers pool.

See response to Comment I9-1, above.

RESPONSE TO COMMENT I9-3

The commenter suggests that the EIR should explain certain requirements of the California Fire Code.

See response to Comment I9-1, above.

RESPONSE TO COMMENT I9-4

The commenter provides an excerpt from the California Fire Code.

See response to Comment I9-1, above.

COMMENT LETTER I10 – JAMES REECE

Dear Chairperson Nybo and Commissioners,

Forwarded to you is the email comment of James Reece, a Bridgeway Towers condominium Owner and resident since 2006, regarding the proposed Sacramento Commons. He will not be able to attend the Planning Commission meeting tonight.

I
I10-1

Jim Pacht

Begin forwarded message:

Jim,

I will not be able to attend the meeting tonight, but I have a comment to share.

When Bridgeway Towers and the other buildings in our four-block neighborhood were first built, it was, and remains, the city's premier high density residential project.

The development is home to hundreds of people: renters, owners, seniors, young people. A mix of high and low-rise structures with beautiful grounds, it has been a roaring success. It is shocking that now the planning commission would wish to destroy something they planned for thirty years ago. The noise, dust, commotion, traffic congestion will last for the better part of a decade and will utterly disrupt what is a wonderful neighborhood if the KennedyWilson project is allowed to proceed.

The bank building with 10 stories of parking the city approved at the corner of 5th and Capitol Mall is an example of the type of structure that is ugly and destroys ground level ambience. This is what the planning commission wants for our neighborhood? Those of us who choose to live downtown have invested time and treasure in our homes. We are the pioneers the city wants. There are dozens of other spots in the downtown area that are suited to what we already have: high density, mixed use residential housing.

J. Reece

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I10-2
I10-3
I10-4
I10-5

RESPONSE TO COMMENT I10-1

A commenter states that he is passing along a comment from another commenter.

The City acknowledges this comment.

RESPONSE TO COMMENT I10-2

The commenter provides background on the project site.

The comment does not raise specific questions or information regarding the adequacy of the environmental analysis provided in the DEIR and this comment is included for City Council consideration.

RESPONSE TO COMMENT I10-3

The commenter mentions noise, dust, traffic congestion, and the length of construction period.

The comment does not raise specific questions or information regarding the adequacy of the environmental analysis provided in the DEIR and this comment is included for City Council consideration. See Master Responses 2.3.1.1, 2.3.1.2, 2.3.1.3, 2.3.1.4, 2.3.1.5, and 2.3.1.6 for a detailed response related to construction noise and vibration. See Section 4.2 of the DEIR for a discussion of dust, including Impact 4.2-1 and Mitigation Measure 4.2-1, which is designed to reduce fugitive dust.

RESPONSE TO COMMENT I10-4

The commenter expresses the opinion that a different project is ugly.

The comment does not raise specific questions or information regarding the adequacy of the environmental analysis provided in the DEIR. Refer to Master Response 2.3.3 for a discussion of aesthetic changes associated with the project.

RESPONSE TO COMMENT I10-5

The commenter believes that there are other locations in the Central City area that could accommodate the project.

Please see Master Response 2.3.7.5 for a discussion of off-site alternatives.

COMMENT LETTER I11 – KATHLEEN GREEN

Evan Compton

From: Kathleen Green <kdgreenone@yahoo.com>
Sent: Sunday, April 12, 2015 5:11 PM
To: Scott Johnson; Evan Compton; Jose Bodipo-Memba; Kiyomi Burchell; Ed Chandler; Douglas Covill; sacplanning.declines@me.com; Todd Kaufman; Kim Mack; David Nybo; Matthew Rodgers; Joe Yee
Cc: Steve Hansen
Subject: Fw: email addresses
Attachments: April 10 Planning Com ltr.docx

Attached are my comments on the Sacramento Commons project.
Kathleen Green

I
111-1

April 10, 2015

Planning and Design Commission

915 I Street

Sacramento, CA 95814

RE: Opposition to the Sacramento Commons project

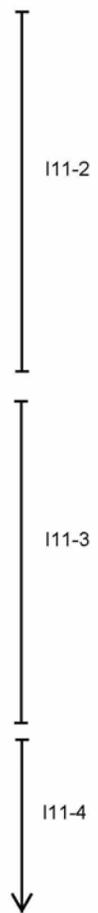
Dear Chair & Planning Commissioners,

This proposed demolition and development (if the lots are sold to developers and built??), will not only displace hundreds of households but adversely affect the existing Bridgeway and Pioneer Towers residents of their sunlight, site views and quality of life in a quiet, park-like setting. This could be a Cabrini Green of the future.

With demolition of 4 blocks the Planning Commission should recommend to the Council that Kennedy-Wilson or their assignees show proof of contracts and financing for construction before issuing any demolition permits. This proposal is not mentioned in the DEIR.

The removal of 200 healthy mature canopy of trees has not been adequately addressed in the DEIR. The impact of the heat created with the loss of so many trees and to the air quality in the downtown area should be analyzed in detail. The Arborist Report estimates that it will take more than 25 years to compensate and mitigate for the loss of these older mature trees. Other arborist have noted that new trees planted in the narrow strips near tall buildings do not do well compared to trees in a park setting. Could the Commission propose that alternatives be required in the building sites to save many of the trees with just the siting of a building?

Capitol Towers and Villas is a prime example of mid-century modern architecture in a garden setting, designed by renowned 20th mid-century design professionals. And today after 54 years is a healthy, functioning, beautiful, historic complex of moderate rent housing in the urban core. It is also the only one in the urban core.



I urge the Commission to scrutinize this project and send alternative recommendations on this proposal to the City Council.

↑
111-4
cont.

Kathleen Green

2010 Vizcaya Walk; Sacramento, Ca 95818

kdgreenone@yahoo.com

cc:

RESPONSE TO COMMENT I11-1

The commenter provides an introduction to comments.

The City acknowledges this comment.

RESPONSE TO COMMENT I11-2

The commenter discusses displacement of residents, sunlight, views, a park-like setting, and a request to show proof of construction financing prior to issuing demolition permits.

Refer to Master Response 2.3.3 for a discussion of aesthetic changes associated with the project. See Master Response 2.3.6 for a discussion related to construction phasing and economic viability. See Chapter 3 of the DEIR for a discussion related to land use, population, and housing, including existing and future development in the Central City area. See Master Response 2.3.6 for a discussion of the phasing of demolition and construction. See Section 4.10 of the EIR for a discussion of park and recreation impacts of the project. Please see Master Response 2.3.10.3 for a discussion of accommodating housing at different affordability levels. Should the City Council exercise its discretion to approve the proposed project, City staff recommends the City Council adopt a term in the development agreement requiring demolition for any phase of the proposed project not to commence until building permits have been issued for the associated construction phase.

RESPONSE TO COMMENT I11-3

The commenter opines that tree canopy impacts have not been adequately addressed in the DEIR, that heat created with the loss of trees should be analyzed, that it will take more than 25 years to mitigate tree impacts, that trees planted in narrow strips do not do well. The commenter asks about an alternative that would reduce tree impacts.

Please see Master Responses 2.3.2.2, 2.3.2.3, 2.3.2.6, 2.3.2.8, and 2.3.2.9 for information about tree impacts, the landscaping plan, mitigation, revisions to the project, and calculations of tree growth. Please see Master Responses 2.3.7.1, 2.3.7.2, and 2.3.7.4 for a discussion of alternatives.

As detailed in the Initial Study for the proposed project (see Appendix B of the DEIR), urban heat islands are large areas of substantially higher air temperature in developed areas as compared to surrounding natural or agricultural landscapes, which often result from the lack of significant plant and/or tree canopy cover and the use of dark-colored pavement and building surfaces. Whereas light-colored surfaces reflect solar radiation and trees cool air temperatures, dark-colored surfaces absorb solar radiation and release heat energy that increases air temperatures. Large urban expanses with dark-colored pavement and lack of significant vegetated ground or tree canopy cover can lead to, or increase, the formation of smog and heat-related illnesses. However, at a micro level, individual building or small paved areas, by themselves, would not contribute these areawide heat island effects.

The California Attorney General, in its guidance on how to address heat island effects through general plan and other policies (The California Environmental Quality Act: Addressing Global Warming Impacts

at the Local Agency Level), recommends the adoption of a heat island mitigation plan, which could include requirements for cool roofs, cool pavements, and strategically placed shade trees. According to the Attorney General's guidance, darker colored roofs, pavement, and lack of trees may cause temperatures in urban environments to increase by as much as 6-8 degrees Fahrenheit as compared to surrounding areas. The City's General Plan includes policies and implementation programs that implement the recommendations included in the Attorney General's guidance and directly and indirectly address urban heat islands.

The proposed project would comply with the heat island strategies directed by the General Plan and Central City Urban Design Guidelines. The proposed project would result in a substantial reduction in the existing quantity of darker colored roofs located on-site, would remove existing surface parking lots, and would incorporate project features that further ensure, as compared to existing conditions, that the proposed project would result in no impact with respect to urban heat islands. See also Master Response 2.3.2.5 for information related to GHG sequestration benefits of trees, Master Response 2.3.2.8 for information related to mitigation of tree-related impacts, Master Response 2.3.2.9 for information related to ecosystem services and tree growth calculations, Master Response 2.3.2.11 for information related to rooftop trees, Master Response 2.3.2.12 for information related to non-heritage trees, and Master Response 2.3.2.13 other environmental benefits of trees.

RESPONSE TO COMMENT I11-4

The commenter discusses the history of existing on-site structures and that the existing structures provide moderate rent housing. The commenter urges the Planning & Design Commission to scrutinize the project and consider alternatives.

Please see Master Responses 2.3.4.1 and 2.3.4.2 for information on historic resources. See Master Responses 2.3.4.5 and 2.3.10, which address consistency with General Plan policy, including housing policy. The purpose of the EIR is to disclose, mitigate, and find alternatives that reduce adverse physical environmental effects associated with the project. However, the City provides a comprehensive discussion of population and housing that is related to the comment in Chapter 3 of the DEIR. Please see Master Response 2.3.10.3 for a discussion of accommodating housing at different affordability levels. The opinion of the commenter is acknowledged. Please see Master Response 2.3.7 for information related to alternatives.

COMMENT LETTER I12 – KATHLEEN GREEN

Evan Compton

From: Kathleen Green <kdgreenone@yahoo.com>
Sent: Monday, April 13, 2015 10:48 AM
To: Roberta Deering; caru.bowns@gmail.com; kathleenforrest@hotmail.com; Jon Marshack; chad.moffett@meadhunt.com; eric@bbse.com; mark.huck@parks.ca.gov; Piner Matthew; Evan Compton
Cc: Steve Hansen
Subject: Capitol Towers Eligibility to the City's Historic Resources list

April 10, 2015

Dear Chairman & Members of the Commission:

Capitol Towers and Villas is a great example of mid-century modern architecture in a unique garden setting, and after 54 years it is still a functioning, beautiful, desirable, historic, neighborhood! Since OHP and the State Historic Resources Commission, as well as the National Parks Service "Keeper" have determined that it is eligible for the National Register of Historic Places, there is no question that it should be included on Sacramento's List of Historic Resources.

The Plans submitted by Kennedy-Wilson this could become another "hole-in-the-ground," with the demolition of all the Villas, destroying a canopy of mature trees, including many heritage trees, and displacing hundreds of tenants. This project will go down in the annals of the City of Sacramento's mistakes.

I am in hopes that the Preservation Commission will send a **strong message** to the Planning Commission and City Council members as to the negative effects of this proposed project. **To better plan new construction projects that are going to demolished historic properties, to require that construction plans and financing be in place before any demolition permits are issued.**

I12-1

Yours in Preservation,
Kathleen Green
2010 Vizcaya Walk; Sacramento, 95818
kdgreenone@yahoo.com

RESPONSE TO COMMENT I12-1

The commenter discusses the existing project site architecture, historic standing of existing on-site structures, construction and phasing, and conditions related to construction financing.

See Master Response 2.3.6 for a discussion related to construction phasing and Master Response 2.3.12.9 regarding financial feasibility. Please see Master Responses 2.3.4.1 and 2.3.4.2 for information on historic resources.

COMMENT LETTER I13 – KATHLEEN GREEN

April 24, 2015

RE: Comments on the DEIR of March 9⁵, 2015 for Sacramento Commons proposed project (O14-012)

Dear Mr. Johnson:

As a concerned midtown resident watching this "Sacramento Commons" proposed project by Kennedy Wilson I concur with all the comments of Sacramento Modern, Carr Kunze, and the "Neighbors of Capitol Towers & Villas, as well as the comments from Karen Jacque, Board member of Preservation Sacramento. I also hope the tenants of Pioneer Tower will submit comments as they will be greatly affected by this ill conceived project. Capitol Towers' (Sacramento Commons) National Register of Historic Places and State eligibility as a Historic District, is the only garden apartments super-block even near downtown.

I13-1

The Preservation Commission voted unanimously April 15, 2015 to include Capitol Towers and Villas be added to the City's Register of Historic Resources as a Landmark. **They also voted unanimously to DENY this project!**

I13-2

Housing Element of this project-analyzed - The City of Sacramento General Plan 2013-2021 analysis of the type of housing needed in the Central City by neighborhood. Some of that analysis should be included in

I13-3

this EIR report. It also includes the vacant land and lots in the Central City (Section 5.4 Vacant Land Inventory).

↑
I13-3
cont.

An Alternative not noted is an 'off site' project that the City can transfer these entitlements to another site to save this Historic District.

I13-4

Possible "Hole-in-the-Ground" Project I did not see an 'alternative' measure in the DEIR on how the City can avoid this project being another "Hole-in-the-Ground project". Since Kennedy Wilson is not building any of these proposed apartments, and only acquiring the entitlements and demolition permits to then sell to a developer, the "hole-in-the-ground" scenario is a real possibility. The EIR should suggest mitigation measures so this does not happen.

I13-5

An Alternative not noted in the DEIR: The City will not issue any demolition permits without proof of plans, a construction contract and financing.

I13-6

Construction Disruption and Noise:

The EIR should analyze the displacement of the tenants in the Villa apartments, the loss of business the ground floor business' of the Tower; and loss of tenants in the Tower due to construction. As well as Pioneer Tower. KW has said they will phase construction over a 6 year period, but depending on the economy it could will be much longer.

I13-7
I13-8
I13-9
I13-10

Arborist Report-Tree Canopy Loss and its effects. The DEIR was weak on the effect of the loss of 200 trees, some heritage trees, in this project. Trees filter and capture air pollution from cars and with N and P Streets being main corridors in and out of the downtown, it is even more important to save these trees. There should be charts of the carbon monoxide that each tree absorbs, equating into the number of pounds of more pollution in the air that will affect the downtown.

I13-11

These trees are a major reason that Capitol Towers, as it was planned over 50 years ago, in a garden setting, is a desirable, beautiful, historic community to live in.

I13-12

The 'No Project' could be more elaborate in its description of the benefits of not allowing this project to proceed. As an ALTERNATIVE-the City

I13-13
↓

possibility transferring entitlements to another more appropriate vacant parcel for high-rise apartments? In the **City's General Plan 2013-2021, The Housing Element – Section 5 Land Inventory** of the Sacramento General Plan 2013-2015 is the list of the vacant lots and blocks within the Central City that could accommodate this possibility. It did note that there is enough vacant land to accommodate these projected housing needs to 2021.

↑
I13-13
cont.

In closing, this Historic National Register District adds significance to the quality of life. It is a desirable neighborhood to live in the down town area.

I13-14

The recent construction in the Central City and nearby of apartments, townhouses, homes, low income housing, plus the infill of single lots has been progressing at warp speed. All of these projects did not DESTROY a Historic, functioning, community!

I13-15

I have enclosed my compiled list of these development just in the last 5 years. It does not include the many single-family homes on single lots or the Oak Park area.

I13-16

If this project is approved it will go down in Sacramento's annals of City development/City Planning MISTAKES: The Alhambra Theatre, the Francesca apartments, the Merrium Apartments, and the California Hotel, to name a few.

I13-17

Kathleen Green

2015 housing projects cont:

NEW RESIDENTIAL HOUSING NEAR OR IN DOWNTOWN:

Proposed projects:

-Railyards & River District

-Township 9 – Richards Blvd. Hwy 16 – *10,000 to 12,000 units entitled in this district & the River District & Railyards*

-Crystal Creamery property – 11th & C Street & West- 98 townhouses/homes.

-Docks Waterfront – south of capitol Mall along the river-housing potential and business' – Front Street 1155 units

-North West Land Park project -282 single family homes & townhouses – Aug '15

-Former Clarion, 700–16th Sts-160 units –Senior Housing

-5th & 6th & J St. – Hotel & residential Tower-69 condominiums

-The Old Marshal Hotel 7th & L w/be Hyatt Place Hotel w/ 10-15 apartment or condominiums

Ice Blocks – R St – 16th & 17th, retail and residential (?)

Whole Foods Apts. – 140 units L & 21st Sts.

Total = approximately 10,624

Rental units recently completed or underconstruction:

-Alexan Midtown – Alhambra & S Sts. Completed in 2010
275 units

Hall of Justice – 813 6th St. – 42 units

-The KAY –Block between 7th to 8th & K Sts – will be 137 units + 72,000 sqft retail & enterainment

113-18



2015 housing projects cont:

- Legado deRavel** – 16th St between N & P Streets, two 5 story apartments w/ground floor retail. 84 apartments
- 16 Powerhouse** – 16th & P St.- 50 unit apartment six-story building w/restaurant on the groundfloor(Magpie Café, Inspiration Coffee, & Japanese Restaurant)
- The WAL** (Warehouse Artist Lofts) R & 11th Streets – 116 apartments
- The Warren/EVIVA**– corner of N & 16th Streets -50 to 118 rental pre-fab units
- LaValentina** 12th & E Street housing- 3- three story bldgs. w/ 81 units – affordable apartments
- Maydstone**-15th & J Sts., historic 3-story apt rehabbed '12. 32 units
- 7th & H St.** – 6 story w/retail on ground floor w/150 apartment Units-studios & 1 Brd. Mercy Low income housing
Reports claim was last of low income financing.
- 15th & I Sts.** – **i15**, 8 story –proposed D&S Development – 80 units but not decided
- 16th & H Sts** – Condos/Apartments w/ground floor retail -44 units
SE corner -5 or 6 story completed 2011
TL= approximately 1099

I13-18
cont.

New Residential Homes being built:

- Tapestri Square** – block of 20th to 21st, T & U Streets – 58 Townhouses – 3 story
- Curtis Park Village** – in old Western Pacific railyards, will be retail, homes. 294 single-family homes, 132 market-rate multi-family

2015 housing projects cont:

units & 92 senior affordable housing multi-family units. Also
180,000 sqft of retail space.

-**McKinley Park Village** – close to central City 334 – townhouses
and single family homes

-**SoCAP Lofts** 1717 6th St (solar powered) Townhouses

-**Sutter Brownstones** 27th on N St. – 28 units

-**Single Family on S & 20th St** – two story 2 & 3 Brd, completed
Winter `13 – 9 townhouses

-1724 E Socap Walk (between Q&R & 6th and 7th Sts)

-**24th & S STs** - 5 single family houses

-**2500 R Street Townhouses** (solar powered). – 34 Townhouses- 2
& 3 Brds. 2-story

-**515 T St.** – Townhouse by CALPers, solar powered -14 units

-**Many single lot infill houses** over the last 3 to 5 years.

TL = approximately 672+

West Sacramento near river:

-**Capitol Yards** –apartments in Raley Landing neighborhood,
282 units, W.Sacramento plans approximately 4000 new
residential units in this area. Plans include streetcar
service to downtown Sacramento.

-**The Park Moderns** – just south of Raley Field – 32-unit
townhouses - completed June `14

-**Jefferson Blvd.** east side to river – 8000 homes

My compilations-Kathleen Greenr

revised 4/20/2015

113-18
cont.



RESPONSE TO COMMENT I13-1

The commenter discusses other comment letters.

The City has responded in writing to all comments received during the DEIR public review period and several that were received after the close of the public review period.

RESPONSE TO COMMENT I13-2

The commenter identifies the historic classification of the project site.

Please see Master Responses 2.3.4.1 and 2.3.4.2 for information on historic resources. On April 15, 2015, the Preservation Commission recommended that the City Council list Capitol Towers on the Sacramento Register. The City Council will, but has not yet, held a public hearing to consider the Preservation Commission recommendation and to take a final action on the nomination.

RESPONSE TO COMMENT I13-3

The commenter discusses the City's Housing Element and that information from the Housing Element should be included in the EIR.

The purpose of the EIR is to disclose, mitigate, and find alternatives that reduce adverse physical environmental effects associated with the project. However, the City provides a comprehensive discussion of population and housing that is related to the comment in Chapter 3 of the DEIR, including information from the City's Housing Element. See Master Responses 2.3.4.5 and 2.3.10, which address consistency with General Plan policy, including housing policy. Please see Master Response 2.3.10.3 for a discussion of accommodating housing at different affordability levels. Please see also Master Response 2.3.7.5 regarding off-site alternatives.

RESPONSE TO COMMENT I13-4

The commenter discusses an off-site alternative.

Please see Master Response 2.3.7.5 for a discussion of off-site alternatives.

RESPONSE TO COMMENT I13-5

The commenter discusses the possibility that the project could be abandoned.

Please see Master Responses 2.3.6.1 and 2.3.12.9 regarding economic feasibility and abandonment of the project.

RESPONSE TO COMMENT I13-6

The commenter discusses a condition for the project requiring a construction contract and financing prior to issuance of a building permit.

Please see Master Responses 2.3.6.1 and 2.3.12.9 regarding economic feasibility and abandonment of the project.

RESPONSE TO COMMENT I13-7

The commenter suggests that the EIR should analyze displacement of tenants.

The City provides a comprehensive discussion of population and housing in Chapter 3 of the DEIR, including information from the City's Housing Element. See Master Responses 2.3.4.5 and 2.3.10, which address consistency with General Plan policy, including housing policy. Please see Master Responses 2.3.10.3 and 2.3.12.12 for a discussion of accommodating housing at different affordability levels.

RESPONSE TO COMMENT I13-8

The commenter suggests that the EIR should analyze displacement of tenants and loss of ground floor business.

The project does not propose to close the ground floor non-residential development in the Capitol Tower building. Please refer to the Response to Comment I13-7 for a discussion of tenant displacement.

RESPONSE TO COMMENT I13-9

The commenter suggests that the EIR should analyze loss of tenants due to construction.

The purpose of the EIR is to disclose, mitigate, and find alternatives that reduce adverse physical environmental effects associated with the project. It is speculative to assume vacancy rates will increase in the superblock as a result of project construction. All environmental issues related to construction (air quality, noise, vibration, traffic) are analyzed and reported in the appropriate section of the DEIR. Please refer to the Response to Comment I13-7 for a discussion of tenant displacement.

RESPONSE TO COMMENT I13-10

The commenter suggests that project phasing could be longer than indicated in the DEIR.

See Master Response 2.3.6 for a discussion related to construction phasing and economic viability. See Chapter 2 of the DEIR for a comprehensive description of the proposed project, including anticipated phasing. As noted in the DEIR, the proposed order of demolition and construction phasing may be subject to change due to market conditions.

RESPONSE TO COMMENT I13-11

The commenter suggests that the tree impact analysis in the EIR is weak and discusses carbon monoxide (presumably carbon dioxide) absorption of trees.

See Master Responses 2.3.2.2, 2.3.2.3, 2.3.2.4, 2.3.2.5, 2.3.2.7, and 2.3.2.8 for a discussion related to the DEIR tree impact analysis, landscape plan, mitigation, carbon sequestration benefits of trees, and the City's significance determination related to tree impacts.

RESPONSE TO COMMENT I13-12

The commenter identifies aesthetic benefits of trees.

See Master Response 2.3.2.4 for a discussion of aesthetic changes related to trees.

RESPONSE TO COMMENT I13-13

The commenter notes that the No Project Alternative could have a more elaborate description of benefits and suggests consideration of other sites.

See Master Responses 2.3.7.1, 2.3.7.2, 2.3.7.3, 2.3.7.4, and 2.3.7.5 for information on the purpose of alternatives analysis, the process used to develop alternatives, alternatives impacts, and off-site alternatives.

RESPONSE TO COMMENT I13-14

The commenter references a historic national register district.

See Master Response 2.3.4 for information about the existing setting and historic resources impacts. This comment is noted and will be provided to the City Council as part of this FEIR for consideration.

RESPONSE TO COMMENT I13-15

The commenter identifies housing construction in the Central City.

The City provides a comprehensive discussion of population and housing in Chapter 3 of the DEIR, including information about other developments. See Master Responses 2.3.4.5 and 2.3.10, which address consistency with General Plan policy, including the City's policies for encouraging infill development in the Central City area. Please see Master Responses 2.3.10.3 and 2.3.12.12 for a discussion of accommodating housing at different affordability levels. Please see also Master Response 2.3.7.5 for a discussion of off-site alternatives.

RESPONSE TO COMMENT I13-16

The commenter indicates that she will provide a list of other development projects.

The comment does not raise specific questions or information regarding the adequacy of the environmental analysis provided in the DEIR. The City provides a comprehensive discussion of population and housing in Chapter 3 of the DEIR, including information about other developments. See Master Responses 2.3.4.5 and 2.3.10, which address consistency with General Plan policy, including the City's policies for encouraging infill development in the Central City area. Please see Master Responses 2.3.10.3 and 2.3.12.12 for a discussion of accommodating housing at different affordability levels. Please see also Master Response 2.3.7.5 for a discussion of off-site alternatives.

RESPONSE TO COMMENT I13-17

The commenter opines that approval of the proposed project would be a mistake.

The comment does not raise specific questions or information regarding the adequacy of the environmental analysis provided in the DEIR and is included for City Council consideration.

RESPONSE TO COMMENT I13-18

The commenter provided a list of other development projects.

The comment does not raise specific questions or information regarding the adequacy of the environmental analysis provided in the DEIR. The City provides a comprehensive discussion of population and housing in Chapter 3 of the DEIR, including information about other developments. See Master Responses 2.3.4.5 and 2.3.10, which address consistency with General Plan policy, including the City's policies for encouraging infill development in the Central City area. Please see Master Responses 2.3.10.3 and 2.3.12.12 for a discussion of accommodating housing at different affordability levels. Please see also Master Response 2.3.7.5 for a discussion of off-site alternatives.

COMMENT LETTER I14 – DR. KNOX MELLON

Scott Johnson

From: Carlotta Mellon <carlotta.mellon@sbcglobal.net>
Sent: Monday, April 27, 2015 2:47 PM
To: Mayor of the City of Sacramento, Kevin Johnson; David Nybo; Scott Johnson; Evan Compton; Sacramento Modern
Cc: Michael Galizio
Subject: Sacramento Commons Project

Dear Mayor Johnson, City Planning Commission Chair Nybo, Mr. Johnson and Mr. Compton:

As a longtime California State Historic Preservation Officer, though now retired, but still an advocate for retention of historic structures and fabric, I want to express my admiration and support for Sacramento Modern's efforts to preserve Capitol Towers and have it become a local landmark on the Sacramento Register of Historic and Cultural Resources. These efforts are clearly in the interests of the wonderful historic city of Sacramento.

14-1

I further support the preservation of the mature and vibrant community surrounding these historic buildings and ask the city to protect this rare central city neighborhood by finding an alternative to the Sacramento Commons proposal.

14-2

Sincerely,

Dr. Knox Mellon

RESPONSE TO COMMENT I14-1

The commenter expresses support for the efforts of Sacramento Modern to preserve Capitol Towers.

The comment does not raise specific questions or information regarding the adequacy of the environmental analysis provided in the DEIR. This comment is noted and will be provided to the City Council as part of this FEIR for consideration. See also Master Response 2.3.4 for information about the existing setting and historic resources impacts.

RESPONSE TO COMMENT I14-2

The commenter expresses support for preserving Capitol Towers and finding an alternative to the proposed project.

The comment does not raise specific questions or information regarding the adequacy of the environmental analysis provided in the DEIR. See Master Response 2.3.4 for information about the existing setting and historic resources impacts and Master Response 2.3.7 for information about alternatives to the proposed project.

COMMENT LETTER I15 – JOSH CROFT

Evan Compton

From: Josh Croft <joshua.m.croft@gmail.com>
Sent: Thursday, April 09, 2015 6:26 PM
To: Evan Compton; Steve Hansen
Subject: I DO support the demolition of the villas and mature tree canopy associated with Capitol Towers

Once the arena is built, the demand to live in the area will go up. I support Capitol Towers efforts to increase the supply of available housing. I want to live in the area but can't afford a big rent hike in the coming years! I15-1

Thanks,
Josh

RESPONSE TO COMMENT I15-1

The commenter expresses support for the project's proposal to increase housing in the area and states that they cannot afford a significant increase in rent.

The comment does not raise specific questions or information regarding the adequacy of the environmental analysis provided in the DEIR. The City provides a comprehensive discussion of population and housing in Chapter 3 of the DEIR. See Master Responses 2.3.4.5 and 2.3.10, which address consistency with General Plan policy, including the City's policies for increasing housing in the Central City area. Please see Master Responses 2.3.10.3 and 2.3.12.12 for a discussion of accommodating housing at different affordability levels.

COMMENT LETTER I16 – JANE KRYSKI MORRIS

Evan Compton

From: JANE <jane349@comcast.net>
Sent: Sunday, April 12, 2015 1:18 PM
To: Evan Compton
Subject: Sacramento Commons

Dear Sirs or Mme.:
I would be remiss stating the fact that I was pro development. However, if I must, I can stomach responsible development. What is proposed for Sacramento Commons is not responsible at all. PLEASE DO NOT ACCEPT THEIR PROPOSED PLAN.
I am asking that we would return to the drawing boards and come up with a feasible plan where we will can still enjoy all of our trees.
Sincerely,
Jane Kryski Morris

I16-1

RESPONSE TO COMMENT I16-1

The commenter contends that the proposed project is not responsible development and is asking for an alternative plan that preserves more trees.

This comment is noted and will be provided to the City Council as part of this FEIR for consideration. Please see Master Responses 2.3.2.2, 2.3.2.3, 2.3.2.6, 2.3.2.8, and 2.3.2.9 for information about tree impacts, the landscaping plan, mitigation, revisions to the project, and calculations of tree growth. Please see Master Responses 2.3.7.1, 2.3.7.2, and 2.3.7.4 for a discussion of alternatives.

COMMENT LETTER I17 – LOUISE JACKSON

Evan Compton

From: Louise E Jackson <lejackson@ucdavis.edu>
Sent: Sunday, April 12, 2015 6:57 PM
To: Evan Compton; Steve Hansen; bodipo50@gmail.com; burchillcitypc@gmail.com;
cburke.realestate@gmail.com; ed@loftgardens.com; dcovill@cbnorcal.com;
sacplanning_declines@me.com; todd.s.kaufman@gmail.com; kimjoanmc@att.net;
dnybo@wateridge.net; matt@mrpe.com; jyeepdc@gmail.com; darrellteatjr@yahoo.com
Subject: Protect historic low rise villas and mature trees from demolition

To the Planning Commission:

Why tear down a beautiful neighborhood that is highly cherished by residents? People will move out if you force them to endure years of construction.

In-fill building should draw residents to the city center, not turn them away.

PLEASE SAVE THE TREES AND VILLAS AT CAPITOL TOWERS,

Louise Jackson

--
Louise E. Jackson
500 N St
Sacramento CA
lejackson@ucdavis.edu

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17-1
I

RESPONSE TO COMMENT I17-1

The commenter references removal of housing structures, construction, and adding population in infill developments.

The comment does not raise specific questions or information regarding the adequacy of the environmental analysis provided in the DEIR. All environmental issues related to construction (air quality, noise, vibration, traffic) are analyzed and reported in the appropriate section of the DEIR. The City provides a comprehensive discussion of population and housing in Chapter 3 of the DEIR. See Master Responses 2.3.4.5 and 2.3.10, which address consistency with General Plan policy, including the City's policies for increasing housing in the Central City area. Please see Master Responses 2.3.10.3 and 2.3.12.12 for a discussion of accommodating housing at different affordability levels.

COMMENT LETTER I18 – KATHY LES

Evan Compton

From: Kathy Les <kathy.les321@gmail.com>
Sent: Monday, April 13, 2015 2:36 PM
To: Evan Compton; Bruce Monighan
Subject: Preservation of Capitol Towers

To: Evan Compton, Senior Planner and Bruce Monighan, Urban Design Manager

Dear Evan and Bruce:

I am writing to express my support for preserving Capitol Towers, both the low and high rise structures, as well as the Lawrence Halprin landscaping. These are gems that speak to early modern architecture in Sacramento. I urge the Planning Commission to find a more viable plan that allows for historic renovation, rather than destruction through demolition of the low-rise structures and inappropriately re-cladding the high rise tower.

118-1

So many times in the past, Sacramento got it wrong with mis-guided remodeling or demolition. We had finally entered a new era of respect for historic structures, and now this proposal. I hope the developers, with your guidance, can revisit their plans and come up with a more creative solution, or find a new site in the nearby area. Isn't the new arena supposed to be bringing out the best in us moving forward? This proposal seems downright disrespectful of our collective architectural heritage, in terms of urban design and planning.

Thank you for your consideration.

Sincerely,

Kathy Les,
Curtis Park resident and former Design Review Board Member

RESPONSE TO COMMENT I18-1

The commenter discusses existing housing structures, landscaping, architecture, a different site for the project, and architectural heritage.

The comment does not raise specific questions or information regarding the adequacy of the environmental analysis provided in the DEIR. See Master Response 2.3.4 for information about the existing setting and historic resources impacts and Master Response 2.3.7 for information about alternatives to the proposed project. Please see Master Responses 2.3.10.3 and 2.3.12.12 for a discussion of accommodating housing at different affordability levels. Please see also Master Response 2.3.7.5 for a discussion of off-site alternatives.

COMMENT LETTER I19 – KENT AND MARY SCHROEDER

Evan Compton

From: Mary Schroeder <findmary@pacbell.net>
Sent: Wednesday, April 15, 2015 7:32 AM
To: Evan Compton
Cc: Schroeder Mary
Subject: Sacramento Commons

This is to ask you to protect the Sacramento Commons. We are retired County residents but spent years working downtown. Sacramento Commons is one of the loveliest areas in The City. It's elegance and architectural significance are irreplaceable. Developers should be required to incorporate the historic buildings and landscape into their new plans. They can look to other vacant lots in the vicinity for residential development.

|
119-1
|

Sincerely,
Kent and Mary Schroeder
4524 Crestridge Road
Fair Oaks, CA. 95628
916-952-0906

Sent from my iPhone

RESPONSE TO COMMENT I19-1

The commenter discusses architectural significance of existing on-site buildings, that the project should incorporate existing buildings into the project, and that the City should pursue alternative sites.

See Master Response 2.3.4 for information about the existing setting and historic resources impacts and Master Response 2.3.7 for information about alternatives to the proposed project include Master Response 2.3.7.5 regarding off-site alternatives.

COMMENT LETTER I20 – HEATHER FARGO

From: Heather Fargo [<mailto:h-fargo@comcast.net>]
Sent: Wednesday, April 15, 2015 2:08 PM
To: eric@bbse.com; chad moffett; caru bowns; kathleenforrest@hotmail.com; mark huck; jon marshack; pinerworks@sbcglobal.net
Cc: Evan Compton; Bruce Monighan; Roberta Deering; Burg, Willian; Kneprath, Kay; Lamare, Jude
Subject: Capitol Towers

Dear Chair Fuller and Preservation Commissioners:

I am writing to urge you to support Capitol Towers listing on the Sacramento Register, and ultimately the National Register. I also ask that you encourage the Planning Commission to consider the preservation of this existing community as a higher priority than increasing the quantity of high rise housing at THIS site. Please urge the Planning Commission to require the developers to incorporate the historic buildings and landscape into their new plans, and to find a way to preserve the existing community of Capitol Towers.

I20-1

I20-2

As a councilmember and later as Mayor, I represented this neighborhood for 19 years. I became very familiar with its residents and businesses and its assets and significance to downtown Sacramento. It's not just an apartment complex, as I'm sure you noticed if you've visited. It's a community of very satisfied residents and business owners who love and contribute to the downtown vibrancy, and have for decades. It is a site which allows the disabled residents to freely navigate from their homes to restaurants, shopping, and other services, without having to cross a street. And for the many employed residents, the adjacency of light rail and the many employers

I20-3

in the area, including the State, means they can get to work without driving. I found it to be one of the safest and happiest neighborhoods in the city. It seems unfair to disrupt this neighborhood just because they are renters. This wouldn't and couldn't happen in another residential block in downtown Sacramento, because the residential property owners wouldn't allow it.

↑ I20-3
con't.
I20-4
I20-5

I support higher density and worked hard for years to encourage more housing in the central city. I'm pleased to see the interest and demand for downtown living. But this is an existing neighborhood, and is already one of the densest housing in the central city. Its success should serve as a model for other development, not a reason to take it down. Within just a few blocks are a half dozen empty or underutilized blocks that would be so much more appropriate for this development. The general plan specifically calls for "protection of existing neighborhoods" (see quote below), based on input from residents throughout Sacramento.

I20-6
I20-7

Sacramento is a special city, and part of what it makes it so special, is that we have preserved what makes it unique. One of my goals as mayor was to preserve the unique historic buildings and neighborhoods in downtown. That effort is part of what has positioned Sacramento for its current round of progress. It's part of what has attracted residents and businesses to locate here. Capitol Towers, with its stability, walkability, tree canopy, and sense of community is a special place that should also be preserved.

I20-8
I20-9

Thank you for considering my comments.

Heather Fargo
former Mayor of Sacramento (2000-2008)

from the City's General Plan - "Protect Established Neighborhoods"

"The City shall preserve, protect, and enhance established neighborhoods by providing sensitive transitions between these neighborhoods and adjoining areas, and by requiring new development, both private and public, to respect and respond to those

I20-10
↓

existing physical characteristics buildings, streetscapes, open spaces, and urban form that contribute to the overall character and livability of the neighborhood. (RDR)"



I20-10
con't.

RESPONSE TO COMMENT I20-1

The commenter supports listing of the project site on the Sacramento and National Registers and would prefer maintaining the project site in its current condition instead of adding housing at this site.

This comment is noted and will be provided to the City Council as part of this FEIR for consideration. See Master Response 2.3.4 for information about the existing setting and historic resources impacts and Master Response 2.3.7 for information about alternatives to the proposed project.

RESPONSE TO COMMENT I20-2

The commenter urges the Planning Commission to incorporate historic buildings and landscaping into the project.

See Master Response 2.3.4 for information about the existing setting and historic resources impacts and Master Response 2.3.7 for information about alternatives to the proposed project.

RESPONSE TO COMMENT I20-3

The commenter provides background regarding the existing site related to satisfaction of residents and business owners, downtown vibrancy, mobility for disabled residents, and proximity to light rail and employment.

The City concurs that the project site's adjacency to light rail and many employers in the area, including the State, means residents of the project site can get to work without driving. The comment does not raise specific questions or information regarding the adequacy of the environmental analysis provided in the DEIR and is provided for City Council consideration. Sacramento Regional Transit (RT) has a process to evaluate transit stops and provide specifications for replacement stops that may be required if proposed projects would adversely affect access during construction or operational phases (Canfield, pers. comm. 2015). RT staff would visit proposed sites to determine the need for replacement bus stops meet RT's operational and Americans with Disabilities Act (ADA) standards. RT provides specifications for replacement stops, including concrete pad space and electrical connections and RT's contractor moves and installs any benches or shelters after the pads are in place. See also Master Response 2.3.6 for a discussion of actions taken to ensure public access during construction, Master Response 2.3.6.2 for discussion of traffic management during construction.

RESPONSE TO COMMENT I20-4

The commenter identifies the project site as one of safest and happiest in the City.

The comment does not raise specific questions or information regarding the adequacy of the environmental analysis provided in the DEIR and is provided for City Council consideration.

RESPONSE TO COMMENT I20-5

The commenter discusses the equity of developing the project with existing renters being located on the project site.

The comment does not raise specific questions or information regarding the adequacy of the environmental analysis provided in the DEIR. The City provides a comprehensive discussion of population and housing in Chapter 3 of the DEIR, including information about other developments. See Master Responses 2.3.4.5 and 2.3.10, which address consistency with General Plan policy, including the City's policies for encouraging infill development in the Central City area.

RESPONSE TO COMMENT I20-6

The commenter indicates support for housing in the Central City area in general, but not on the proposed project site.

The comment does not raise specific questions or information regarding the adequacy of the environmental analysis provided in the DEIR. The City provides a comprehensive discussion of population and housing in Chapter 3 of the DEIR, including information about other developments. See Master Responses 2.3.4.5 and 2.3.10, which address consistency with General Plan policy, including the City's policies for encouraging infill development in the Central City area.

RESPONSE TO COMMENT I20-7

The commenter encourages an off-site alternative and references General Plan policy related to protection of existing neighborhoods.

The project site is located in a developed area of downtown within an established neighborhood adjacent to existing residential and office uses. The project has been designed to preserve the existing neighborhood quality of the area and to provide a sensitive transition to adjacent uses through landscaping, building heights, and shared open space areas that contribute to the overall character and livability of the neighborhood. Please see Master Responses 2.3.4.5 and 2.3.10.1 for a discussion of the consistency of the project with the General Plan. Please see Master Response 2.3.7.5 for information related to off-site alternatives.

RESPONSE TO COMMENT I20-8

The commenter generally references historic buildings.

Please see Master Response 2.3.4 for a discussion of historic resources.

RESPONSE TO COMMENT I20-9

The commenter generally references tree canopy.

Please see Master Response 2.3.2 for information related to trees and the tree canopy.

RESPONSE TO COMMENT I20-10

The commenter has quoted General Plan policy related to protection of existing neighborhoods.

The project site is located in a developed area of downtown on an existing developed site with residential development adjacent to existing residential and office uses. The project has been designed to preserve the existing neighborhood quality of the area and to provide a sensitive transition to adjacent uses through landscaping, building heights, and shared open space areas that contribute to the overall character and livability of the neighborhood. Please see Master Responses 2.3.4.5 and 2.3.10.1 for a discussion of the consistency of the project with the General Plan.

COMMENT LETTER I21 – KATHLEEN GREEN

April 28, 2015

Chairperson David Nybo

Planning and Design Commissioners via email

300 Richards Blvd., 3rd Floor

Sacramento, CA 95811

Dear Chairperson Nybo and Commissioners:

I am a mid-town resident and "Preservationist" **opposed** to the Sacramento Commons project (P-14012).

I21-1

In light of the vacant lots and blocks within the central city, it makes no sense to demolish an existing, thriving Historic (deemed historic by the National Parks Service/National Trust of Historic Places, the State Historic Resources Commission and SHPO, and the City's Preservation Commission) functioning, community that meets all the requirements of the City's 2030 General Plan. Within that Plan under the Housing Element, Sec. 5, 5.0, second bullet; *"The land inventory includes enough capacity to meet the RHNA for all income levels. The City can accommodate 10,891 lower-income units (i.e., extremely low, very low, and low income units), 6,527 moderate income units, and 11,722 above moderate-income units."* There is enough vacant land in the Central City to accommodate this. This and the Preservation Ordinance's mission, as well as the tree policy, puts this project in conflict with all the City's goals.

I21-2

Attached is my list of the housing projects recently completed in the last 5 years and those under construction and those in the pipe-line; i.e., the Railyards, Township 9, and the Docks proposal. **NONE OF THESE HAVE DEMOLISHED HISTORIC BUILDINGS TO BE BUILT!**

I21-3

To avoid these demolitions the City should impose conditions to prevent hole-in-the-ground projects, which this project will be if approved. **Require the investor/developer to have legally binding contracts for all construction, complete financing, and City approved project plans before demolition permits are issued.**

I21-4

I urge this Commission to DENY this project, as the Preservation Commission did. Please send a strong message to the City Council of the negative possibilities if this project is approved.

I21-5

Yours in Preservation

Kathleen Green

C: New Residential Projects Near or in Downtown

2015 housing projects cont:

NEW RESIDENTIAL HOUSING NEAR OR IN DOWNTOWN:

Proposed projects:

-Railyards & River District

-Township 9 – Richards Blvd. Hwy 16 – *10,000 to 12,000 units entitled in this district & the River District & Railyards*

-Crystal Creamery property – 11th & C Street & West- 98 townhouses/homes.

-Docks Waterfront – south of capitol Mall along the river-housing potential and business' – Front Street 1155 units

-North West Land Park project -282 single family homes & townhouses – Aug '15

-Former Clarion, 700–16th Sts-160 units –Senior Housing

-5th & 6th & J St. – Hotel & residential Tower-69 condominiums

-The Old Marshal Hotel 7th & L w/be Hyatt Place Hotel w/ 10-15 apartment or condominiums

Ice Blocks – R St – 16th & 17th, retail and residential (?)

Whole Foods Apts. – 140 units L & 21st Sts.

Total = approximately 10,624

Rental units recently completed or underconstruction:

-Alexan Midtown – Alhambra & S Sts. Completed in 2010
275 units

Hall of Justice – 813 6th St. – 42 units

-The KAY –Block between 7th to 8th & K Sts – will be 137 units + 72,000 sqft retail & enterainment

121-6



2015 housing projects cont:

- Legado deRavel** – 16th St between N & P Streets, two 5 story apartments w/ground floor retail. 84 apartments
- 16 Powerhouse** – 16th & P St.- 50 unit apartment six-story building w/restaurant on the groundfloor(Magpie Café, Inspiration Coffee, & Japanese Restaurant)
- The WAL** (Warehouse Artist Lofts) R & 11th Streets – 116 apartments
- The Warren/EVIVA**– corner of N & 16th Streets -50 to 118 rental pre-fab units
- LaValentina** 12th & E Street housing- 3- three story bldgs. w/ 81 units – affordable apartments
- Maydstone**-15th & J Sts., historic 3-story apt rehabbed '12. 32 units
- 7th & H St.** – 6 story w/retail on ground floor w/150 apartment Units-studios & 1 Brd. Mercy Low income housing
Reports claim was last of low income financing.
- 15th & I Sts.** – **i15**, 8 story –proposed D&S Development – 80 units but not decided
- 16th & H Sts** – Condos/Apartments w/ground floor retail -44 units
SE corner -5 or 6 story completed 2011
TL= approximately 1099

I21-6
cont.

New Residential Homes being built:

- Tapestri Square** – block of 20th to 21st, T & U Streets – 58 Townhouses – 3 story
- Curtis Park Village** – in old Western Pacific railyards, will be retail, homes. 294 single-family homes, 132 market-rate multi-family

2015 housing projects cont:

units & 92 senior affordable housing multi-family units. Also
180,000 sqft of retail space.

-**McKinley Park Village** – close to central City 334 – townhouses
and single family homes

-**SoCAP Lofts** 1717 6th St (solar powered) Townhouses

-**Sutter Brownstones** 27th on N St. – 28 units

-**Single Family on S & 20th St** – two story 2 & 3 Brd, completed
Winter `13 – 9 townhouses

-1724 E Socap Walk (between Q&R & 6th and 7th Sts)

-**24th & S STs** - 5 single family houses

-**2500 R Street Townhouses** (solar powered). – 34 Townhouses- 2
& 3 Brds. 2-story

-**515 T St.** – Townhouse by CALPers, solar powered -14 units

-**Many single lot infill houses** over the last 3 to 5 years.

TL = approximately 672+

West Sacramento near river:

-**Capitol Yards** –apartments in Raley Landing neighborhood,
282 units, W.Sacramento plans approximately 4000 new
residential units in this area. Plans include streetcar
service to downtown Sacramento.

-**The Park Moderns** – just south of Raley Field – 32-unit
townhouses - completed June `14

-**Jefferson Blvd.** east side to river – 8000 homes

My compilations-Kathleen Greenr

revised 4/20/2015

I21-6
cont.



RESPONSE TO COMMENT I21-1

The commenter registers her opposition to the project.

The comment does not raise specific questions or information regarding the adequacy of the environmental analysis provided in the DEIR and is acknowledged by the City.

RESPONSE TO COMMENT I21-2

The commenter discusses vacant lots in the Central City area and historic characterization of on-site structures.

Please see Master Responses 2.3.4.1 and 2.3.4.2 for information on historic resources. Please see Master Response 2.3.7.5 for a discussion of off-site alternatives.

RESPONSE TO COMMENT I21-3

The commenter suggests that the City's Housing Element land inventory provides enough capacity to meet the regional housing needs assessment and identifies tree impacts and the intent of the City's historic preservation ordinance. The commenter references an attached list of other development projects.

The City provides a comprehensive discussion of population and housing in Chapter 3 of the DEIR, including information about other developments. See Master Responses 2.3.4.5 and 2.3.10, which address consistency with General Plan policy, including the City's policies for encouraging infill development in the Central City area. Please see Master Responses 2.3.10.3 and 2.3.12.12 for a discussion of accommodating housing at different affordability levels. Please see Master Responses 2.3.4.1 and 2.3.4.2 for information on historic resources. Please see Master Response 2.3.2 for a discussion of tree and tree canopy impacts.

RESPONSE TO COMMENT I21-4

The commenter discusses potential abandonment of the project and suggests a project condition requiring contracts and construction financing prior to approval of a demolition permit.

The comment does not raise specific questions or information regarding the adequacy of the environmental analysis provided in the DEIR and this comment is included for City Council consideration. See Master Response 2.3.6 for a discussion related to construction phasing and economic viability.

RESPONSE TO COMMENT I21-5

The commenter urges the Planning & Design Commission to deny the project.

The comment does not raise specific questions or information regarding the adequacy of the environmental analysis provided in the DEIR and this comment is included for City Council consideration.

RESPONSE TO COMMENT I21-6

The commenter provides a list of other development projects.

The City provides a comprehensive discussion of population and housing in Chapter 3 of the DEIR, including information about other developments. See Master Responses 2.3.4.5 and 2.3.10, which address consistency with General Plan policy, including the City's policies for encouraging infill development in the Central City area. Please see Master Response 2.3.7.5 for a discussion of off-site alternatives.

COMMENT LETTER I22 – JUDITH LAMARE

Thank you. You did not include a mitigation measure we requested in NOP comment:

" to require that there be no demolition of any parcel until Kennedy Wilson or its assignee shows proof of a binding contracts for construction and full financing" I22-1

because Sacramento does not need another disaster like the former Saca and Aura projects, which, respectively gave downtown a huge hole in the ground and yet another surface parking lot.

JUDITH LAMARE

RESPONSE TO COMMENT I22-1

The commenter discusses potential abandonment of the project and suggests a project condition requiring contracts and construction financing prior to approval of a demolition permit.

The comment does not raise specific questions or information regarding the adequacy of the environmental analysis provided in the DEIR and this comment is included for City Council consideration. See Master Responses 2.3.6 and 2.3.12.9 for a discussion related to construction phasing and economic viability.

COMMENT LETTER I23 – JIM PACHL

Dear Chairperson Nybo and Commissioners,

Below are a couple of additional considerations which should be addressed in the project design or redesign (if the project is approved). I apologize for the lateness of this submittal.

1. Potential for subsidence of adjacent buildings from excavation dewatering: The DEIR, pp 4.5-10 thru 4.5-13, section titled "Impact 4.5-2," says "The proposed project could expose people to subsidence, . . .". Among other things, it says that construction dewatering of excavations for Sac Commons structures may be required, that artificial fill was placed on the site in the 1860's, and that "if the dewatering system draws down the water table adjacent to the excavation area, there is a possibility of ground settlement that may undermine existing foundation on adjacent sites, causing cracking." The DEIR says that subsidence has occurred at other locations in downtown and then asserts that unspecified geotechnical analysis, building code compliance, and unspecified future engineering measures would prevent this from occurring. The DEIR does not explain how these unspecified measures would prevent subsidence.

I23-1

Even a few vertical inches of soil subsidence beneath adjacent Pioneer or Bridgeway Towers could cause cracking of foundations, which could create stresses on pipes and structural concrete in these buildings, potentially causing cracked pipes and cracked concrete slabs. Soil subsidence could also crack Bridgeway's swimming pool and spa.

I23-2

If construction of the 8-story apartments requires excavation and dewatering, those buildings should be located a greater distance from Pioneer and Bridgegay Towers to reduce the likelihood of soil subsidence beneath those existing high-rises. KW should be required to post a bond to cover any damage caused by subsidence arising from dewatering the soil for the project.

I23-3

2. California Fire Code § 903.3.5.2, ATTACHED, requires a secondary on-site water supply of no less than 15,000 gallons, or greater if warranted by the calculations stated in that Fire Code section, for high-rise buildings in Seismic Catagories C thru F . This is not mentioned in any of the Sacramento Commons project documents.

The Bridgeway Towers swimming pool meets that requirement for Bridgeway. I suspect that the Capitol Towers swimming pool meets that requirement for Capitol Towers. Removal of the Capitol Towers swimming pool would cause that building to be noncompliant. Based on the conceptual drawings, it appears that the swimming pools atop the proposed Sac Commons high-rises would be too small to accommodate 15,000 gallons each (or more if required by the formula of §903.3.5.2) Project redesign may be needed to accommodate the necessary water storage facilities. Compliance with §903.3.5.2 is mandatory and may not be waived by the Sacramento Fire Department

I23-4

Thank you very much.

Jim Pachl

sprinkler demand as required by NFPA 13R.

903.3.5.2 Secondary water supply. An automatic secondary on-site water supply having a *usable* capacity of not less than the hydraulically calculated sprinkler demand, including the hose stream requirement, shall be provided for high-rise buildings *and Group I-2 occupancies having occupied floors located more than 75 feet above the lowest level of fire department vehicle access* in Seismic Design Category C, D, E or F as determined by the *California Building Code*. An additional fire pump shall not be required for the secondary water supply unless needed to provide the minimum design intake pressure at the suction side of the fire pump supplying the automatic sprinkler system. The secondary water supply shall have a duration of not less than 30 minutes *or as determined by the occupancy hazard classification in accordance with NFPA 13, whichever is greater. The Class I standpipe system demand shall not be required to be included in the secondary on-site water supply calculations. In no case shall the secondary on-site water supply be less than 15,000 gallons.*

Exception: Existing buildings.

123-5

RESPONSE TO COMMENT I23-1

The commenter quotes from DEIR pages 4.5-10 through 4.5-13 regarding the fact that artificial fill was likely placed at the project site during the 1860s, and states that the DEIR says that construction dewatering could result in subsidence at adjacent sites. The commenter states that the DEIR fails to specify how a geotechnical analysis, building code compliance, and future engineering measures would prevent subsidence at adjacent sites from occurring.

The analysis contained in the DEIR relied, in part, on a Geotechnical Feasibility Report prepared for the project by ENGEO (2014) (attached to the DEIR as Appendix E). As is common in the downtown Sacramento area, soils generally consist of artificial fill brought in the mid- to late 1800s and a high groundwater table is present. The low structural bearing capacity of the artificial fill, the high groundwater table, and the potential for liquefaction, subsidence, and settlement must be addressed for any project constructed in the downtown area (including the time when the Pioneer and Bridgeway Towers were constructed). For high-rise buildings, such as the proposed project, these issues are generally dealt with by constructing deep pier foundations that are drilled into stable rock; at the project site, stable rock is located approximately 60–80 feet below the ground surface.

The Geotechnical Feasibility Report for the proposed project identifies four types of deep foundation systems for possible support of the proposed high-rise structures on the site. Two of the proposed foundation systems—driven and torque-installed steel piles—do not create soil or groundwater surplus; rather, the soil surrounding the pile is densified and the earth pressures cause the soil to adhere to the sides of the pile. This effectively seals the pile into the soil layer with no gaps created along the sides of the pile such that groundwater would not be expected to discharge from these pier types. However, the other two types of piles methods involve drilling and could potentially create soil and groundwater spoils.

As indicated in Section 4.8 “Hydrology and Water Quality”, in Impact 4.8-1, if construction dewatering is required, the proposed project is required to comply with City’s Engineering Services Policy No. 0001, which requires approval of a Memorandum of Understanding (MOU) for long-term (greater than one week) groundwater dewatering discharges. The MOU must cover proposed dewatering details such as flow rate and system design. In addition, Mitigation Measure 4.5-2 (DEIR pages 4.5-12 and 4.5-13) requires the project applicant to obtain the services of a licensed geotechnical engineer to prepare a site-specific design-level geotechnical report that will address and make specific recommendations on a variety of geotechnical conditions such as construction dewatering, subsidence, and settlement. The proposed project is required by California law to be designed and constructed to meet the standards contained in the California Building Standards Code (CBC), the requirements of which have been specifically designed to reduce geotechnical hazards and address and provide for building safety and stability, including subsidence and settlement. Compliance with City building codes requires the project applicant to submit all proposed plans for building design and site construction to the City for engineering review and to determine compliance with the CBC. Thus, the proposed project would not result in adverse effects to nearby buildings related to settlement or subsidence and the impact would be less than significant. This conclusion is further supported by the fact that other projects in the project area, such as 500 Capitol Mall, which is located north of and directly across the street from the project

site, have been developed in recent years without adversely effecting nearby buildings related to settlement or subsidence.

RESPONSE TO COMMENT I23-2

The commenter states that even a few vertical inches of soil subsidence beneath adjacent Pioneer or Bridgeway Towers could cause structural damage and damage to facilities, such as swimming pools and spas.

Please see Response to Comment I23-1, above.

RESPONSE TO COMMENT I23-3

The commenter states that if excavation and dewatering are required, the proposed buildings should be located a greater distance from Pioneer and Bridgeway Towers to reduce the likelihood of soil subsidence beneath those buildings. The commenter further suggests that the project applicant should be required to post a bond to cover any damage caused by subsidence arising from dewatering the soil for the project.

As discussed in DEIR Impact 4.5-2 and summarized above in Response to Comment I23-1, the proposed project is required by California law to be designed and constructed to meet the standards contained in the CBC, the requirements of which have been specifically designed to reduce geotechnical hazards and provide building safety and stability, including subsidence and settlement. Preparation of site-specific design-level geotechnical report, which will be reviewed by the City for verification of compliance with CBC, on a phase by phase basis as individual project phases are fully designed and submitted to the City as part of future site plan and design review will ensure the proposed project would not result in adverse effects to nearby buildings related to settlement or subsidence. Thus, the impact is considered less than significant and there is no need to locate the proposed buildings further away from the Pioneer or Bridgeway Towers.

RESPONSE TO COMMENT I23-4

The commenter identifies a section of the California Fire Code related to secondary on-site water supply source.

As discussed in Section 4.10-2, the California Fire Code contains regulations relating to construction, maintenance, and use of buildings. Topics addressed in the code include fire department access, fire hydrants, automatic sprinkler systems, fire alarm systems, fire and explosion hazards, hazardous materials storage and use, provisions intended to protect and assist fire responders, industrial processes, and many other general and specialized fire-safety requirements for new and existing buildings and the surrounding premises. The California Fire Code contains specialized technical regulations related to fire and life safety.

According to the Fire Department, per 2013 California Fire Code Section 503 - Fire Apparatus Access Roads; 503.1.1- Approved fire apparatus access roads shall be provided for every facility. Roads shall

extend within 150 feet of all portions of the facility and all portions of the exterior walls of the first story of the building. Every building will be required to meet 2013 California Fire Code and California Building Code and will receive a building permit upon meeting these requirements. Regarding the backup water supply requirements for fire suppression in high-rise buildings, 15,000 gallons is the Code minimum. If the location were to remove the swimming pool that was approved as the backup water supply, the building would be required to add a water tank or provide an approved second water supply in lieu of the pool (Tunson, pers. comm., 2015 and Lee, pers. comm., 2015). As stated in the DEIR, the proposed project is required to comply with this as well as all other applicable California Fire Code requirements. Furthermore, as discussed in the PUD Guidelines for the proposed project, each phase of the proposed project requires future site plan and design review. Project design for each phase will incorporate all features required by the California Fire Code and other applicable laws. See also the Response to Comment I9-1.

RESPONSE TO COMMENT I23-5

The commenter provides an excerpt from the California Fire Code.

See Response to Comment I23-4, above.

COMMENT LETTER I24 – MELISSA GAUDREAU

From: Melisa Gaudreau

I encourage the City Planning and Design Commission, and the City Council to vote NO on the Sacramento Commons project at the Capitol Towers site, as currently proposed. Although I am with the office of Page & Turnbull, and assisted with the nomination for the property to the National Register of Historic Places, I am writing today as a resident of Sacramento, an architect, and a member of a family of 4 that enjoy the many aspects of Sacramento that make this city interesting, beautiful and livable.

I24-1

I see this proposed project as wrong for Sacramento on so many levels;

I24-2

- It ignores the original design, erasing a rare Sacramento example of successful placemaking and urban design
- It demolishes a resource eligible for the National Register of Historic Places, California Register of Historical Resources, and Sacramento Register of Historic and Cultural Resources – a property that gained unanimous vote in favor for listing from the State Historical Resources Commission and the Sacramento Preservation Commission, experts in the field
- It removes a place that represents the formulative work of mid-century, national & local designers, and denies any future generation the opportunity to experience the site to formulate their own opinions/understanding/interpretation of the work (Wurster, Bernardi and Emmons; Edward Larrabee Barnes; DeMars & Reay; Lawrence Halprin; Dreyfuss and Blackford; among others)
- It strips away a mature site weaving urban, landscape, public art and architectural design that continues to be successful and well-loved
- The proposed project does not comply with Sacramento’s General Plan, as it does not protect historic and cultural resources
- The proposed project discards preservation alternatives, and dismisses possible rehabilitation and densification of the site in a manner to protect the historic significance and eligibility of the resource

I24-3

I24-4

I24-5

- The proposed project destroys the eligible resource by demolition, with no feasible mitigation for the adverse effect [124-6]

- The proposed design has no potential to replicate the critical acclaim and architectural awards given to the original WBE design, and will very unlikely duplicate the receipt of National Register eligibility in 50 years [124-7]

I ask for you to have the courage to reassess the proposed project, and study the appropriate redevelopment of the site in a manner respectful of its design, intelligence and quality. Certainly the City can now recognize the significance of the property, and have the leadership to put together a project to be proud of, for 50 more years. Undoubtedly density and value can be added to the property while maintaining its historic character and features intact. Our downtown is dotted with buildings and sites with historic character of different periods of design – a layered fabric that is unique to Sacramento and signifies our individual story. Capitol Towers deserves to remain a physical part of our fabric and a living piece of the story. Please make the correct decision and do not accept the demolition of this site and the proposed design for Sacramento Commons. [124-8]

Thank you for your consideration to this important site,

Melisa Gaudreau

RESPONSE TO COMMENT I24-1

The commenter encourages the Planning & Design Commission and City Council to deny the proposed project and references a nomination of the property to the National Register of Historic Places.

Please see Master Response 2.3.4 for a discussion of historic resources.

RESPONSE TO COMMENT I24-2

The commenter believes the project is wrong due to the impact on what the commenter believes is a successful example of placemaking and urban design.

Please see Master Response 2.3.4 for a discussion of historic resources and Chapter 3 of the DEIR for a discussion of the project's consistency with City urban design policies and standards. Please see also Master Response 2.3.3.6 for a discussion of City site plan and design review for the proposed project.

RESPONSE TO COMMENT I24-3

The commenter discusses historic characterization of the project site and urban design.

Please see Master Response 2.3.4 for a discussion of historic resources and Chapter 3 of the DEIR for a discussion of the project's consistency with City urban design policies and standards. Please see also Master Response 2.3.3.6 for a discussion of City site plan and design review for the proposed project.

RESPONSE TO COMMENT I24-4

The commenter claims that the project is inconsistent with the City's General Plan.

Please see Master Responses 2.3.4.5 and 2.3.10.2 for a discussion of consistency of the project with the City's General Plan.

RESPONSE TO COMMENT I24-5

The commenter suggests alternatives, including rehabilitation and densification.

Please see Master Responses 2.3.7.6 and 2.3.7.7 for a discussion of alternatives suggested by the commenter.

RESPONSE TO COMMENT I24-6

The commenter references historic resources on-site and the lack of feasible mitigation to avoid adverse effects.

Please see Master Responses 2.3.4.1, 2.3.4.2, and 2.3.4.4 for a discussion of historic resources. As noted by the commenter, the DEIR concludes that historic resources impacts caused by the proposed project are significant and unavoidable.

RESPONSE TO COMMENT I24-7

The commenter discusses historic characterization of the project site and awards for the original design.

Predictions related to whether the proposed project or any contemporary development project will warrant consideration as an historic resource 50 years from today is speculative. Please see Master Response 2.3.4 for a discussion of historic resources and Chapter 3 of the DEIR for a discussion of the project's consistency with City urban design policies and standards.

RESPONSE TO COMMENT I24-8

The commenter calls for a new design for the project, and references the historic significance of the property and historic character of other locations in Sacramento. The commenter urges decision makers to deny the project.

Please see Master Response 2.3.4 for a discussion of historic resources.

COMMENT LETTER I25 – BECKY FERGUSON

Letter I25

From: Becky Ferguson

Thanks, Michael. This is in relation to the Sacramento Commons project. Given that the plan would require demolition of the current units that has a significant impact on the downtown rental housing market. Do they have any plans with how they will release tenants from current leases with ample notice? I am concerned that the legal 60 days would make it difficult if all the individuals in the units being demolished are released at once. That seems like a lot of people who chose to live downtown who would be back on the market all at once.

I
125-1
I

Thanks,
Becky

--

Becky Ferguson

Penn State '08 HHD, '11g EDU

RESPONSE TO COMMENT I25-1

The commenter mentions the rental housing market downtown and the process for notifying tenants.

The comment does not raise specific questions or information regarding the adequacy of the environmental analysis provided in the DEIR and this comment is included for City Council consideration. Please see Master Responses 2.3.10.3 and 2.3.12.12 for a discussion of accommodating housing at different affordability levels. Please see also Master Response 2.3.12.8 regarding residential displacement.

COMMENT LETTER I26 – JUDITH LAMARE

From: Judith Lamare

Dear Chair Nybo and Planning Commissioners:

Neighbors of Capitol Towers and Villas has submitted the attached comment to the City's environmental review unit on the DEIR for Sacramento Commons project. This includes the results of an independent arborist report summarized below and attached. We urge you to achieve much more certainty for tree canopy protection and no net loss for future tree canopy than is being offered by Kennedy Wilson in their Sacramento Commons proposal. We also address in detail a number of other issues, **including the proximity of new buildings to our existing residential towers.**

I26-1

Neighbors of Capitol Towers and Villas contracted with Gordon Mann, a certified arborist, to review the DEIR and project arborist's report (Dudek Report). Key findings of the Gordon Mann Arborist report are:

I26-2

- The Project's Arborist's Report (Dudek Report) is accurate and reliable regarding inventory, health assessments, evaluations and risk assessment. However, the Dudek report errs in including City Street trees in calculating the ecosystem benefits of the project and in not disclosing the lost 25 year ecosystem services of the 199 trees to be removed from the project (were they to remain for 25 years). The Mann report relies upon the Dudek inventory and analysis. (Mann, p. 17)

I26-3

- The proposed project tree planting (Conceptual Landscape Plan) to replace the removal of 191 mature (non-Heritage) existing trees is only 147 ground planted trees. This proposed planting plan is less than a 1:1 ratio of replacement trees to removed trees. The proposed number and size of tree planting proposed is insufficient mitigation for the impacts this project will have on the ecosystem services on the site. (Mann, p. 1)

I26-4

- Proposed rooftop trees should not be included in the calculation of ecosystem services because rooftop trees are quite small and deliver minimal services, primarily as amenity trees. (Mann, p. 7)

I26-5

- The non-Heritage trees to be removed provide much higher benefits than the Heritage and City Trees but only the Heritage and City tree removals are mitigated. The Dudek report in Table 2, on page 15, shows that only 16 trees out of 291 trees in the inventory (18.2%) are in Fair/Poor to Poor condition. Almost all of the trees to be removed are in good health and can be maintained and continue to add value and services to the property and community with acceptable risk. (Mann, p. 6, 7, 8)

I26-6

- The proposed landscape plan would remove existing landscape and then take between 20 and 25 years or more to meet the existing site ecosystem services even if fully implemented and

maintained by property owner. Absent the project, the existing landscape would continue to provide the current or higher level of those ecosystem services over those 20 to 25 years. The cumulative annual ecosystem services lost over these 20-25 years is not being recognized or calculated. (Temporal loss is not identified). (Mann, p. 7, p. 10)

↑
I26-6
cont.

- The successful performance of the proposed Conceptual Landscape Plan is not likely due to the following factors. Construction site preparation involves grading and soil compaction that affects both existing –to-be-retained trees and replacement trees. The end result is trees grow with more conflicts to adjacent hardscape and structures, and the result in many recent developments is the loss of the planted trees starting from eight to 20 years after planting, never reaching the 25-year old size they were intended for in the ecosystem services predicted in Table 3. When trees conflict with adjacent hardscape and infrastructure, and there is not adequate space for the trunk and root system, the trees have been removed and replaced with smaller scale trees that will not provide equivalent ecosystem services. If trees are removed and replaced during mitigation activity, it further delays the equivalent restoration of resources beyond the 25 years presented in the arborists report. (Mann, p. 10)

I26-7

- The mitigation for removal of four City street trees and canopy pruning for four City street trees does not reflect their true value in public benefits. These trees are worth thousands of dollars but the mitigation required is in the hundreds of dollars. (Mann, p. 9)

I26-8

- The Alternatives outlined in the DEIR (Chapter 5) lack specific information about the project Landscape Plans for each alternative. The future canopy of remaining existing trees would be larger and remain larger over time with the three alternatives. The DEIR suggestion that removing more large trees and planting more small trees is a better alternative for canopy is not supported by an independent arborist’s evaluation (Mann, p. 14).

I26-9

- The City needs additional adequate specific requirements to ensure that actual project implementation will produce the tree values claimed. (Mann, p. 15) The project conditions should include the following:

I26-10

- 1) Request an appraisal of the value of the Street Trees to be removed for the project, and require a replacement of equal value to the Street Tree population so there is no net loss experienced to the City for the construction of this development.
- 2) Request an appraisal of the value of the project trees approved to be removed for the project, and require a replacement of equal value to the project landscape, excluding rooftop garden trees.
- 3) Require adequate tree protection for any existing trees to protect the soil and roots from the construction activities through the landscape construction phase.
- 4) Require adequate soil volume and growing space for any new trees to be planted in the approved project.

I26-11

I26-11

I26-12

I26-13

- 5) Require the developer to contract grow the proposed new trees for the project. The quantities and species are known from the landscape plan. There should be adequate time to grow the trees that will be planted from the time of plan approval to when the project construction is complete. Do not accept the excuse that the contractor or developer cannot find the approved tree species and sizes when the tree planting phase is occurring. Do not approve final occupancy until all the required trees are planted and have the irrigation system operating.

126-14

Jim Pachl & Jude Lamare

RESPONSE TO COMMENT I26-1

The commenter makes reference to an attached arborist report and requests that the Planning & Design Commission review the arborist report.

This comment letter and the referenced arborist report are provided for City Council consideration (see Response to Comment O6).

RESPONSE TO COMMENT I26-2

The commenter notes that the arborist report included as an appendix has an accurate and reliable inventory, health assessment, evaluation, and risk assessment and that, in the opinion of the commenter, the City Street Trees at the project site should not be included.

Please see Master Response 2.3.2.9.

RESPONSE TO COMMENT I26-3

The commenter alleges that tree mitigation is not sufficient.

Please see Master Responses 2.3.2.2, 2.3.2.3, 2.3.2.7, 2.3.2.8, 2.3.2.9, which address tree removal, the landscape plan, tree mitigation, the City's significance determination, and tree growth estimates.

RESPONSE TO COMMENT I26-4

The commenter believes that rooftop trees should not be included in the calculation of ecosystem services.

Please see Master Response 2.3.2.12, which addresses rooftop trees and Master Response 2.3.2.3, which addresses the landscape plan. The DEIR provides information about ecosystem services both with and without the rooftop trees for decision maker consideration.

RESPONSE TO COMMENT I26-5

The commenter states that non-heritage trees are proposed to be removed but not mitigated.

Please see Master Responses 2.3.2.2, 2.3.2.3, 2.3.2.7, 2.3.2.8, 2.3.2.9, which address tree removal, the landscape plan, tree mitigation, the City's significance determination, and tree growth estimates, and Master Response 2.3.2.12, which addresses non-heritage trees. A landscape architect and arborist have confirmed that the proposed project can accommodate all 147 ground level trees included in the Conceptual Landscape Plan. The applicant has agreed to revise Mitigation Measure 4.3-2 to clarify that the proposed project is required to plant at least 147 ground level trees as part of the landscape for the proposed project. See also the Response to Comment O2-18.

RESPONSE TO COMMENT I26-6

The commenter discusses the length of time for the landscape plan to provide current or higher levels of ecosystem services.

Please see Master Responses 2.3.2.2, 2.3.2.3, 2.3.2.7, 2.3.2.8, 2.3.2.9, which address tree removal, the landscape plan, tree mitigation, the City's significance determination, and tree growth estimates.

RESPONSE TO COMMENT I26-7

The commenter suggests that the landscape plan is not likely to be successful.

Please see Master Response 2.3.2.3, which discusses the landscape plan and likelihood of success. A landscape architect and arborist have confirmed that the proposed project can accommodate all 147 ground level trees included in the Conceptual Landscape Plan. The applicant has agreed to revise Mitigation Measure 4.3-2 to clarify that the proposed project is required to plant at least 147 ground level trees as part of the landscape for the proposed project. See also the Response to Comment O2-18.

RESPONSE TO COMMENT I26-8

The commenter discusses the monetary value of trees.

Please see Master Responses 2.3.2.8 and 2.3.12.5, which discuss mitigation for tree impacts.

RESPONSE TO COMMENT I26-9

The commenter discusses landscape plans for each alternative.

Please see Master Response 2.3.7.4, which discusses alternatives analysis, including analysis of tree impacts.

RESPONSE TO COMMENT I26-10

The commenter discusses the monetary value of trees.

Please see Master Responses 2.3.2.8 and 2.3.12.5, which discuss mitigation for tree impacts.

RESPONSE TO COMMENT I26-11

The commenter discusses the monetary value of trees and rooftop trees.

Please see Master Responses 2.3.2.8 and 2.3.12.5, which discuss mitigation for tree impacts. Please see Master Response 2.3.2.12, which addresses rooftop trees and Master Response 2.3.2.3, which addresses the landscape plan.

RESPONSE TO COMMENT I26-12

The commenter discusses protection of trees during construction.

Please see Master Response 2.3.2.3, which addresses the landscape plan, and Master Responses 2.3.2.8 and 2.3.12.5, which discuss mitigation. A landscape architect and arborist have confirmed that the proposed project can accommodate all 147 ground level trees included in the Conceptual Landscape Plan. The applicant has agreed to revise Mitigation Measure 4.3-2 to clarify that the proposed project is required to plant at least 147 ground level trees as part of the landscape for the proposed project. Mitigation Measure 4.3-2 has been revised to list recommendations set forth in Appendix E to the Arborist Report rather than to incorporate the recommendations by reference. See also the Response to O2-18.

RESPONSE TO COMMENT I26-13

The commenter discusses soil volume and growing space.

Please see Master Response 2.3.2.3, which discusses the landscape plan and Master Response 2.3.2.12, which addresses rooftop trees, including growing space.

RESPONSE TO COMMENT I26-14

The commenter discusses the landscape plan, mitigation, tree species, and irrigation.

Please see Master Response 2.3.2.8 and 2.3.12.5, which discuss mitigation and Master Response 2.3.2.3, which addresses the landscape plan.

COMMENT LETTER I27 – MICHAEL GALIZIO

From: [Michael Galizio](#)

Dear Planning Commission:

I am urging you today to find an alternative to the misguided and not workable proposal for Sacramento Commons being considered this week. Here are six key reasons why this proposal should be stopped: I 127-1

1) During the CEQA process it is incumbent upon the City to provide the necessary leadership, guidance, and commitment to ensure that CEQA law is upheld. Design problems warrant design solutions. Preservation and progress can be achieved at the same time through finding realistic and workable solutions. We are depending on the Commission to do just that. I 127-2

2) The Capitol Towers area is a historic district worth preserving for future generations to experience and enjoy. **The neighborhood is already one of the most densely populated residential areas in downtown Sacramento and is vital and working - don't destroy it for some Beverly Hills money guys.** I 127-3

3) Sacramento Commons' planned demolition and redesign of the historic district will have devastating impacts on numerous levels that CAN and HAVE TO be avoided I 127-4

4) There are at least 30,000 new or entitled units in or close to Central City and another 21,946 units nearby in Natomas, South Sacramento, and West Sacramento. More than could ever be sold or inhabited. I 127-5

5) There are other more suitable sites — that do not contain an established historic district and park neighborhood — that would benefit from such development. Be smart, tell the developers what Sacramento needs not the other way round. I 127-6

6) Water. We don't have any. We cannot, and it is not responsible for you, approve more and more housing in an area that just does not have the water capacity to accommodate the thousands more residents the money guys from Beverly Hills are proposing. The Stanford University Report warns: "It's not a multi-year drought that's getting progressively worse as the years go by. It's that it has barely rained at all this year. That's a much more acute situation in a lot of ways." In addition the report concludes that there is more than a 50% chance that this drought is the "new normal". How can you continue to approve more and more residential building when there is not enough water to handle the existing population? I 127-7

Thank you.

Michael Galizio

RESPONSE TO COMMENT I27-1

The commenter urges the Planning & Design Commission to find alternatives to the proposed project and expresses disagreement with the proposed project.

Please refer to Master Response 2.3.7 for a comprehensive discussion of alternatives.

RESPONSE TO COMMENT I27-2

The commenter generally discusses the design and environmental process.

The comment does not raise specific questions or information regarding the adequacy of the environmental analysis provided in the DEIR and this comment is included for City Council consideration.

RESPONSE TO COMMENT I27-3

The commenter expresses support for preserving the proposed project site structures and mentions the site's density.

Please refer to Master Response 2.3.4 for a comprehensive discussion of historic resources and Master Response 2.3.11 for a discussion of density.

RESPONSE TO COMMENT I27-4

The commenter expresses opposition to demolition on the proposed project site.

Please refer to Master Response 2.3.4 for a comprehensive discussion of historic resources. The comment does not raise specific questions or information regarding the adequacy of the environmental analysis provided in the DEIR and this comment is included for City Council consideration.

RESPONSE TO COMMENT I27-5

The commenter discusses other project entitlements in Sacramento and suggests these other entitlements cannot be sold or inhabited.

The City provides a comprehensive discussion of population and housing in Chapter 3 of the DEIR, including information about other developments. See Master Responses 2.3.4.5 and 2.3.10, which address consistency with General Plan policy, including the City's policies for encouraging infill development in the Central City area. Please refer to Master Response 2.3.7.5 for a discussion of off-site alternatives.

RESPONSE TO COMMENT I27-6

The commenter suggests that other sites would be preferable to the proposed project site.

Please refer to Master Response 2.3.7.5 for a discussion of off-site alternatives.

RESPONSE TO COMMENT I27-7

The commenter discusses water supply.

The City along with much of the State of California is in a state of declared drought. The City has implemented water conservation measures consistent with the Stage 2 Drought described in the City's 2010 Urban Water Management Plan (Section 5.2.3.1 "Stages of Action"). This stage of drought is sufficient for conservation of water up to 30%. The City's conservation goal is 25%, consistent with the Governor's Executive Order B-29-15. The City will continue to enforce Stage 2 drought measures and will implement new measures that will be applicable to new development (also consistent with Executive Order B-29-15). The City Stage 2 drought response does not include suspending the issuances of new connections to the water system. The City anticipates that its water conservation measures will protect its water supply and does not foresee the need to suspend new water connections (Armijo, pers. comm., 2015). Moreover, increasing the percentage of City residents that live in high density residential infill units is one tool that can be used to reduce average household water use within the City. Multi-family homes use approximately half the amount of water for outdoor use compared to single-family homes and approximately 42% of total residential water use is for outdoor landscape irrigation (Public Policy Institute 2006). Therefore, the City views higher-density infill development as part of the solution to address the current and future drought situations.

COMMENT LETTER I28 – TOMMY LEUNG

Letter I28

From: tleung@iuno.com

Dear Mr. Johnson:

I would like to echo SacMod's comments regarding this project.

The Sac Commons project falls far short of achieving its lofty goals. In fact, the project does much to destroy the symbiotic relationship between urban living and environmental friendliness that currently exists. What the Sac Commons project guarantees is the destruction of existing housing with no certainty of replacing same, let alone increase housing units. Sac Commons also guarantees the disruption of existing public transportation by eliminating the major bus stops at 7th and O Streets (for example, see what happened to this bus stop during the recent water/sewer pipe replacement work done along 7th Street) and 5th and O Streets without even mentioning remedial efforts in the DEIR -- must seniors and individuals with disabilities be forced to endure this disruption just so some unknown investors can make an extra buck? The Sac Commons project guarantees the erection of barriers to pedestrian travel along N, 7th, P, and 5th Streets, forcing walkers and individuals with mobility problems into the gutter, without providing for remedial measures in the DEIR just so some investors can make an extra buck.

I28-1
I28-2
I28-3

Developers have plenty of vacant lots on which to erect housing -- as you will recall, the former SACA Tower property is available, and a combo condo/hotel project was proposed for that site, just like one of the structures highlighted in this DEIR. Let this developer experiment on that site -- if it fails, no harm, no foul. If this developer fails on this Super Block, the results would be disastrous -- the destruction of hundreds of housing units, and the surrounding neighborhood. I am sure you have all heard of the South Bronx, the ghetto that was the highlight of urban blight. Well, did you know that before the developer Robert Moses decided to put up the freeway (called the Cross Bronx Expressway) that cut through that South Bronx neighborhood, it was a vibrant, thriving community? Well, just like the South Bronx, the failure of the Sac Commons project can turn this Super Block into California's version of the South Bronx -- do you want this to be your legacy? I notice the DEIR does not discuss the results of a failed project -- do you wonder why?

I28-4

Thank you for your consideration of these comments.

Tommy Leung
Bridgeway Towers Resident

RESPONSE TO COMMENT I28-1

The commenter generally discusses the project and the removal of housing.

The City provides a comprehensive discussion of population and housing in Chapter 3 of the DEIR, including information about other developments. See Master Responses 2.3.4.5 and 2.3.10, which address consistency with General Plan policy, including the City's policies for encouraging infill development in the Central City area. As noted first in the Project Description, Chapter 2 of the DEIR, and then throughout the DEIR, the project proposes a net addition of between 965 and 1,061 dwelling units. Please see Master Response 2.3.10.3 for a discussion of accommodating housing at different affordability levels.

RESPONSE TO COMMENT I28-2

The commenter discusses public transit during construction, a separate project to replace a sewer main, and impacts for seniors and persons with disabilities.

Sacramento Regional Transit (RT) has a process to evaluate transit stops and provide specifications for replacement stops that may be required if proposed projects would adversely affect access during construction or operational phases (Canfield, pers. comm. 2015). RT staff would visit proposed sites to determine the need for replacement bus stops meet RT's operational and Americans with Disabilities Act (ADA) standards. RT provides specifications for replacement stops, including concrete pad space and electrical connections and RT's contractor moves and installs any benches or shelters after the pads are in place. See also Master Response 2.3.6 for a discussion of actions taken to ensure public access during construction, Master Response 2.3.6.2 for discussion of traffic management during construction.

RESPONSE TO COMMENT I28-3

The commenter references barriers to pedestrian mobility.

See Master Response 2.3.6 for a discussion of actions taken to ensure public access during construction and Master Response 2.3.6.2 for traffic management during construction. See also Response to Comment I28-2.

RESPONSE TO COMMENT I28-4

The commenter discusses vacant lots and other failed projects.

See Master Responses 2.3.6.1 and 2.3.12.9 for a discussion of economic feasibility and project abandonment. Please see Master Response 2.3.7.5 for a discussion of off-site alternatives.