

Scott Johnson

From: Ron Maertz <ronmaertz@surewest.net>
Sent: Monday, May 19, 2014 9:08 PM
To: Scott Johnson
Cc: 'Alex Kelter'; Rick Guerrero
Subject: FINAL ENVIRONMENTAL IMPACT REPORT FOR THE SACRAMENTO ENTERTAINMENT AND SPORTS CENTER & RELATED DEVELOPMENT PROJECT (P13-065)

Scott,

The Environmental Council of Sacramento submits the following comments on the subject FEIR. **Please acknowledge receipt of these comments.**

O11-2

City chose to respond to a different comment from the one that was made. In response to the apparent threat to the availability of SRO units near the arena, the City pointed out that, even with the removal of the Hotel Marshall from the SRO program, the number of available units would not fall below the legal floor of 712 units. But the comment did not allege this would occur. The comment was:

“The immediate vicinity of the SESC includes a mixture of housing types including Single Room Occupancy. Urban redevelopment projects of this type sometimes stimulate the real estate market to the point that people who might, say, have minimum-wage jobs at the SESC could no longer afford to maintain their households. If this occurred, a preventable increase in transportation costs, greenhouse gas emissions and unemployment could easily result for these individuals.”

Thus, City’s answer to this comment was totally unresponsive, except for the affirmation that, indeed, the number of SRO hotel spaces will decline as stated in the ECOS comment. No mitigation was proposed for this acknowledged decline.

O11-3

City’s response includes the following:

. “The Proposed Project includes new housing opportunities in downtown Sacramento and will pay City of Sacramento Housing Trust Fund fees, as appropriate, that helps to achieve the goals and policies listed above.

. “The comment requests assessment of the consistency of the Proposed Project with a number of other goals and policies of the 2013-2021 Housing Element, including policies H-1.2.5, H-1.3.1, H-1.3.2, H-1.3.4, and H-3.1.1. The policies cited in the comment address future actions of the City related to such issues as the process of receiving neighborhood input on development, encouraging social equity and elimination of discrimination, economic integration of neighborhoods, providing housing opportunity for all segments of the community, and promotion of extremely low income housing. These policies address social and economic issues, and the comment does not describe any relationship of these policies to physical environmental effects, which are the focus of evaluation in an EIR. Please also see Response to Comment O4-17 for a discussion of the consideration of social and economic effects under CEQA, and Response to Comment O11-2 regarding the potential indirect effects of the Proposed Project on single room occupancy housing in the downtown area.” But the project does not commit to any specific number of housing units. In response to comment O11-14, a commitment of “up to 550 multi-family residential units” is made, but it does not represent a true commitment because the range of the proposed entitled number of units includes zero. The same applies to the project’s contribution to the Housing Trust Fund. These statements are, therefore, unresponsive.

O11-4

City's response includes the following:

"Housing affordability is not an effect of the Proposed Project on the existing physical environment. Please also see Response to Comment O4-17 for a discussion of the consideration of social and economic effects under CEQA."

Response to Comment O4-17 follows:

"Under the heading, "Economic Viability," the comment includes an array of requested actions and programs related to economic and social issues that would promote housing availability and cost, business improvement, and street parking in the Alkali Flat and Mansion Flats neighborhoods. Under CEQA, economic and social effects are relevant only insofar as they may serve as a link in a chain of cause and effect that may connect the proposed action with a physical environmental effect, or they may be part of the factors considered in determining the significance of a physical environmental effect. The comment includes no discussion or information that suggests a connection between the requested measures and the physical environmental effects of the Proposed Project. No evidence has been presented that the Proposed Project would affect, involve or otherwise be connected to the availability or affordability of housing or the level of business activity in the Alkali Flat or Mansion Flats neighborhoods. As such, there is no basis upon which to require the project to implement the measures suggested in this comment."

But the project has already caused (1) building owners nearest the project to raise rents and lease costs, and (2) a plan to remove at least one SRO hotel from the city's SRO program. City provides no evidence to demonstrate at what distance from the project these appreciated land values will fall to zero, leaving open the question of whether Alkali Flat or Mansion Flats will be affected.

City's response to this question also includes the following:

. "As stated on page 5-18 of the Draft EIR, the analysis concludes that the Proposed Project combined with cumulative retail projects would not cause or contribute to urban decay." However, City does not identify what these "cumulative retail projects" are, making this response impossible to analyze and assess for responsiveness. Project itself is lacking in specifics regarding its own retail projects, in that the proposed range of square footage includes zero.

Ron Maertz
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Environmental Council of Sacramento