The following written comments regarding the West Broadway Specific Plan project and the review of the West Broadway Specific Plan Draft EIR pursuant to the California Environmental Quality Act (CEQA) were received during the public comment period of December 23, 2019 through February 20, 2020. Additional comments were received on March 6th and March 10th, and have been incorporated. The comments are part of the project administrative record, and will be provided to the decision-making body for consideration. Environmental issues raised in the comments will receive a response in the Final EIR.

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<th>Date</th>
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<td>1-3-2020</td>
<td>Gavin McCready – Department of Toxic Substances Control</td>
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<td>1-23-2020</td>
<td>Craig Chaffee</td>
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<td>2-13-2020</td>
<td>Jeanette Griffin – California Department of Fish &amp; Wildlife</td>
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<td>2-18-2020</td>
<td>Michael Rock</td>
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<td>Jordan Hensley – Central Valley Regional Water Quality Control Board</td>
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<td>Upper Land Park Neighbors Assn &amp; Land Park Community Assn</td>
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<td>Joe Livaich, President – Upper Land Park Neighbors Assn</td>
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<td>Teri Duarte, Sacramento Metropolitan Air Quality</td>
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<td>Dan &amp; Florence Tibbetts</td>
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<td>Kirk Vyverberg - Land Park Community Association</td>
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<td>Dan Visnich - Colley Civil Rights Coalition</td>
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<td>Brian Biering</td>
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<td>3-10-2020</td>
<td>Jesus Hernandez</td>
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January 3, 2020

Mr. Ron Bess  
City of Sacramento  
300 Richards Boulevard, 3rd Floor  
Sacramento, California 95811

WEST BROADWAY SPECIFIC PLAN DRAFT ENVIRONMENTAL IMPACT REPORT – DATED DECEMBER 2019  
(STATE CLEARINGHOUSE NUMBER: 2018072032)

Dear Mr. Bess:

The Department of Toxic Substances Control (DTSC) received a Draft Environmental Impact Report (EIR) for the West Broadway Specific Plan.

The West Broadway Specific Plan (WBSP) would systematically reintegrate approximately 240 acres of the western portion of Broadway and the Upper Land Park area into the fabric and activity of the City of Sacramento. The project would encourage an increase in overall land use density and facilitate new mixed-use development, reuse, and redevelopment within the Specific Plan Area that supports a mixed income community and a variety of housing choices, including market rate and affordable housing options for low-income, very low-income, and extremely low-income households. While actual future development patterns may vary from these plan assumptions, implementation of the WBSP could result in approximately 3,787 new residences, a net increase of 16.8 acres of parks and recreation space, and up to 42,500 square feet of new recreation-related building space within the Specific Plan Area.

DTSC recommends that the following issues be evaluated in the EIR, Hazards and Hazardous Materials section:

1. The EIR should acknowledge the potential for project site activities to result in the release of hazardous wastes/substances. In instances in which releases may occur, further studies should be carried out to delineate the nature and extent of the contamination, and the potential threat to public health and/or the environment should be evaluated. The EIR should also identify the mechanism(s)
to initiate any required investigation and/or remediation and the government agency who will be responsible for providing appropriate regulatory oversight.

2. If buildings or other structures are to be demolished on any project sites included in the proposed project, surveys should be conducted for the presence of lead-based paints or products, mercury, asbestos containing materials, and polychlorinated biphenyl caulk. Removal, demolition and disposal of any of the above-mentioned chemicals should be conducted in compliance with California environmental regulations and policies. In addition, sampling near current and/or former buildings should be conducted in accordance with DTSC’s 2006 *Interim Guidance Evaluation of School Sites with Potential Contamination from Lead Based Paint, Termitecides, and Electrical Transformers* (https://dtsc.ca.gov/wp-content/uploads/sites/31/2018/09/Guidance_Lead_Contamination_050118.pdf).

3. If any projects initiated as part of the proposed project require the importation of soil to backfill any excavated areas, proper sampling should be conducted to ensure that the imported soil is free of contamination. DTSC recommends the imported materials be characterized according to DTSC’s 2001 *Information Advisory Clean Imported Fill Material* (https://dtsc.ca.gov/wp-content/uploads/sites/31/2018/09/SMP_FS_Cleanfill-Schools.pdf).

4. If any sites included as part of the proposed project have been used for agricultural, weed abatement or related activities, proper investigation for organochlorinated pesticides should be discussed in the EIR. DTSC recommends the current and former agricultural lands be evaluated in accordance with DTSC’s 2008 *Interim Guidance for Sampling Agricultural Properties (Third Revision)* (https://dtsc.ca.gov/wp-content/uploads/sites/31/2018/09/Ag-Guidance-Rev-3-August-7-2008-2.pdf).

DTSC appreciates the opportunity to review the EIR. Should you need any assistance with an environmental investigation, please submit a request for Lead Agency Oversight Application, which can be found at: https://dtsc.ca.gov/wp-content/uploads/sites/31/2018/09/VCP_App-1460.doc. Additional information regarding voluntary agreements with DTSC can be found at: https://dtsc.ca.gov/brownfields/.
If you have any questions, please contact me at (916) 255-3710 or via email at Gavin.McCreary@dtsc.ca.gov.

Sincerely,

Gavin McCreary
Project Manager
Site Evaluation and Remediation Unit
Site Mitigation and Restoration Program
Department of Toxic Substances Control

cc: (via email)

Governor’s Office of Planning and Research
State Clearinghouse
State.Clearinghouse@opr.ca.gov

Ms. Lora Jameson, Chief
Site Evaluation and Remediation Unit
Department of Toxic Substances Control
Lora.Jameson@dtsc.ca.gov

Mr. Dave Kereazis
Office of Planning & Environmental Analysis
Department of Toxic Substances Control
Dave.Kereazis@dtsc.ca.gov
Ron,

Please see attached comments on WBSP and EIR.

Helen

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From: cjchaffee@comcast.net <cjchaffee@comcast.net>
Sent: Wednesday, January 22, 2020 12:19 PM
To: Helen Selph <HSelph@cityofsacramento.org>
Cc: Mayor Steinberg <mayorsteinberg@cityofsacramento.org>; CAWebmanager@hud.gov; Steve Hansen <SHansen@cityofsacramento.org>
Subject: RE: West Broadway Specific Plan -Here's some input from nearby neighbors on the draft plan and EIR

Helen,

Attached are extensive comments and recommendations from neighbors on the City’s draft West Broadway Plan and EIR. This input focuses mostly on the lack of clarity about what the actual long term plans are for the replacement housing on the two subareas of this Special Planning Area (SPA) now containing too much of Sacramento’s total public housing (PH) project units, and creating so many very long term major and costly problems for all in this SPA.

The City’s draft plan does not adequately describe these many decades of major and costly problems with the existing overconcentration of this dilapidated PH, of person facing desperate poverty. Therefore, the plan is not clear on why the City proposes demolishing all the existing PH on the two subareas, and what will actually replace it.

The City says it will create true mixed income communities on those subareas. But the plan is not clear if the City plans to move ANY of the 751 PH units for extremely/very low income out of the SPA, and integrate them elsewhere in Sacramento in areas with none/little - using fair share principles to reduce the major overconcentration of PH and resulting very harmful and costly effects on this SPA community.

Or is the City actually planning to leave all/most of the 751 PH units for extremely/very low income crammed in the SPA and simply cram about double the number of housing units on the same 70 acres and make most of the new units mostly very small rentals, and almost all at least somewhat government subsidized units for other low income levels and lower waged working folks?

This lack of clarity in the drafted plan on this major many-decades-old issue, and
kicking this further down the road are unacceptable. This is one of, if not THE, biggest issues facing this SPA.

The final plan should clearly state that to create a true mixed income community, the City will move a substantial portion of the 751 public housing units out of the SPA, and also include middle to upper income folks/housing and a fair share of owner occupied homes on these two subareas. Moreover, to be effective and helpful for those needing a helping hand up, the final plan should clearly state that the City will integrate such housing for the extremely/very poor throughout the City limits using effective and fair share practices, and that this integration outside the SPA will be done without negative impact to the existing PH residents and accomplished through attrition and voluntary relocation.

Moreover, the City’s plan to cut down many established trees on those two SPA subareas and greatly reduce the many green open areas there to make room for all the new housing units (751 to 1,610 !) is unacceptable.

Last, the EIR is incomplete and therefore unacceptable. For instance the draft fails to include socioeconomic impacts and needs to. CEQA covers socioeconomic impacts. The State Office of Environmental Health Hazard Assessment (OEHHA) covers them and documents how bad the environment is in this SPA vis a vis the existing overconcentration of public housing/persons in poverty.

The Mayor, and the California HUD Office, are copied here. The Mayor is quoted and should have input into this City plan. And HUD’s California/Regional Office has been responsive on past related issue communication about the many very long term public housing problems in this neighborhood. The council member for this area is also copied.

Please let me know if you have any questions, etc. on this input. We appreciate you seeking and incorporating such important “effected community” input. We look forward to reading and providing input on the related Finance Plan when it is drafted and made public.

From: Helen Selph <HSelph@cityofsacramento.org>
Sent: Friday, December 20, 2019 4:28 PM
To: Luree Stetson <lstetson2@earthlink.net>; Craig Chaffee <cjchaffee@comcast.net>
Subject: West Broadway Specific Plan

Luree & Craig,

Since the two of you have been asking, even though the Notice of Availability for the EIR doesn’t come out until Monday, the Draft West Broadway is available now at the following link:

Enjoy and Happy Holidays!

Helen Selph, Associate Planner
City of Sacramento
Community Development Department
300 Richards Blvd. 3rd Floor
Sacramento, CA 95811
(916) 808-7852
 Neighbor input to City on December 2019 First Draft West Broadway Plan and EIR 1-22-2020

Introduction

Thank you for sharing the City’s late December 2019 draft West Broadway Specific Plan and EIR for this Specific Plan Area (SPA) with the effected community. The Sacramento City Community Development Department (CDD) and your team are spending a lot of time, effort, and government resources to work on this huge, extensive and, at times, very detailed plan. The two City draft documents total hundreds of pages, with a draft Finance Plan Report not even released yet. Plan implementation can easily cost BILLIONS of dollars if including much government funding (e.g., low income tax credits) and long-term debt obligation is accounted for. A long-term plan for this area has the potential for major improvements. Therefore, this is very important work that must be done right, with sufficient community input over time. What follows here are rather extensive review comments and recommendations from the perspective of long-term neighbors.

This new long-range City planning effort for this SPA could again bring hope of positive change to this fragile and troubled community. But many neighbors that have lived here a long time are understandably skeptical that positive change will occur. Please take this input not as negative opposition to such planning, but healthy critical thinking based on real life experiences here. Please be responsive and incorporate needed changes we recommend to the final plan and EIR. Please make the plan as clear as possible, and the best it can be. The final plan must raise, not lower, the safety and quality of life for those already living here. As we all know, nice sounding long term and general plans often get changed for the worse over the actual decades as they are actually implemented, as actual funding is sought, and the new specific developments are built. Such “forces” as politics and requirements of funding at the time can drive results rather than best long-term outcomes for the community in this actual area, or for Sacramento, California or our nation.

We understand this Plan and EIR are meant as a ‘20-year plan’ to organize, integrate, update, and improve many past plans for at least “subareas” of this 233-acre area. Long term residents here have been involved with and spent much time and effort on many of these previous, often fragmented efforts that never came to fruition. Nevertheless, we did our best to read the hundreds of pages in the new draft plan and EIR carefully with open minds. Unfortunately, as you know the drafted plan does not include, nor has the City drafted and released any of the Finance Plan (including estimated costs and possible sources of funding). At least rough information and estimates on costs and financing alternatives are integral and necessary for a plan to be clear and sufficiently complete. Without such financial information, the plans made public to date in this draft plan and EIR are at best, far from solid and complete. Many past plans for this area were never realized due to lack of funding, or from funding that would force an even more negative result for this fragile community. We’ve already requested the City to extend the community input period on the drafted plans/EIR past 2-10-2020 until after the draft Finance Plan is completed and released to the public. Again, we’re hoping long term improvements for this SPA are realized.

We understand the plan includes a number of ‘subareas’: Broadway Commercial Corridor, Marina/Miller Regional Park “special study area”, River Gateway area, the Mill housing, Industrial, the Alder Grove (AG) public housing (PH) projects, the Marina Vista (MV) (fna Seavey Circle) PH projects, and the Land Park Woods (LPW) low income apartments. We understand that all these subareas are included in this plan in an attempt to create a more integrated and comprehensive overall plan for this SPA. However, many of the developments in these various subareas will occur on different timeframes, with different funding streams and requirements, and effect the community differently.

Comments and recommendations focus on the AG and MV SPA subareas in the draft Plan and EIR

The review comments and recommendations in this “effected” community input document” are focused on plans for the two large subareas now containing both of Sacramento’s two largest, failed and harmful last century model public housing (PH) projects – AG and MV (the largest and a little newer). These are the subareas in the SPA that have been the most problematic, costly, and in need of change for many decades. Long ago both of these PH projects (each by far the largest in the entire Sacramento area) were both crammed in this one tiny Sacramento neighborhood. Historically this is one of the limited Sacramento areas where persons of color could buy and own homes – well into the 1950s! For instance, only Caucasians were allowed to buy homes east of Riverside Blvd in the actual Land Park neighborhood well into the 50s. During the 1990’s the SACPD said this was the most violent crime ridden area in all of Sacramento because of these PH projects. With cost estimates in previous City plans approaching a half BILLION dollars or more to replace these problematic PH projects, it is a MAJOR and most difficult problem and challenge for Sacramento. Most in this area understand the need for, and support more affordable housing and homeless shelters throughout Sacramento, California,
and our nation. As Governor Newsom says "Homelessness is a national crisis, one that’s spreading across the West Coast and cities across the country. The state of California is treating it as a real emergency."


While individuals need to take some responsibility and initiative for their life/conditions, homelessness and housing affordability are complex multi-faceted issues. The wealth gap and income inequality continue to grow. At the end of 2017, the top one percent of Americans held over 38 percent of the nation’s total wealth. Meanwhile, 53 million American workers earn barely enough to live on. Here in California, those same low-income workers are the very families increasingly forced to live in their cars and turn to the local church for a hot meal. While unemployment rates are at historical lows, wages, pensions, health care coverage/etc. for more are not enough to afford a middle-class life. While there has been a major recovery in our country since the Great Recession of 2008, the national debt is now at an all-time high. Further, interest rates are at really low levels; rate increases are likely and would hurt our economy – including housing affordability.

Sacramento officials aim to place homeless shelter residents into longer term housing within six months of the first night they spend in the short-term homeless facilities. But affordable housing construction in the Sacramento region (and California and our nation) has not kept up with demand, meaning the inventory of available affordable housing where homeless shelter residents can be placed is low. Sacramento officials need to ensure their long-term plans for this SPA vis a vis homelessness and affordable housing address the underlying causes of these problems, not just the consequences (e.g. increased homelessness and lack of affordable housing). Understanding the underlying problems is critical to developing long term effective solutions. Moreover, the plan needs to state that this SPA is not expected to include far more than its’ fair share of (Sacramento’s needed) low income, very small and/or rental housing units. If the City is developing a new policy to concentrate such public and other affordable housing wherever possible, in all new development plans, that should be stated in the plan for this SPA. We doubt that is the case.

As Mayor Stenberg says:

"While I believe strongly that Sacramento needs more affordable workforce housing and housing for the homeless, I also believe that the city must have a fair share policy. It is unfair and ultimately unsuccessful to over concentrate any housing or social service effort in one or several neighborhoods. I am firmly committed to leading a community dialogue and action plan to both provide more affordable housing and to ensure that we all take responsibility to help those trying to recover and improve their lives."

Furthermore, one of the very top policy considerations in the stated City scope of this “West Broadway” SPA is: “H-1.3.5 Housing Type Distribution:

“The City shall promote an equitable distribution of housing types for all income groups throughout the city and promote mixed income neighborhoods rather than creating concentrations of below-market-rate housing in certain areas. “

This SPA presently contains about 44% of all such SHRA PH units in the entire City limits! This SPA contains about 50% low-income government subsidized housing units. That is certainly a major over-concentration of below-market-rate housing! Further about 50% of all existing housing units in the SPA are rentals. Home ownership in our nation, state, and Sacramento continues to slide with resulting decreases in community stability and the long-term socioeconomic well-being of our society. In particular persons of color continue to face substantially lower home ownership rates and decreased long-term socioeconomic stability. Sacramento must plan for and implement equitable and effective solutions.

Sacramento officials must practice what they preach/promise: Utilize fair share integration policies for such public and other affordable housing throughout Sacramento. Don’t keep it unfairly over-concentrated here in this SPA as it has been for the last 70 years. Furthermore, the City must not try to say that by simply increasing housing densities in this SPA the present over-concentration is “watered down” and no longer a problem. The City’s final plan for this SPA should not create the distinct possibility that not only will all the present PH units with the related major and costly problems remain, but that it could get worse. The final plan should not create the possibility of turning our primarily residential neighborhood where we raise our families into a failed higher-density urban experiment for the City, with all 826 public/low income housing units all left crammed in, and the quality of life and safety in the area getting worse. That would not be fair or promote “equitable distribution”, or a truly “mixed income neighborhood.”
On June 26, 2019 in a phone conversation with City Planner Helen Selph she assured me that this West Broadway long term plan would recognize an over-concentration of PH in this SPA, in this little area of Sacramento, and the need for the City to move some of these PH units out of the area and integrate them in some other good Sacramento areas using a fair share approach. She emphasized that their CDD planning role is long term and at a high overall level, that others in the City like SHRA and the Mayor's Office must work on such, and that such integration will be long term and "will be a heavy lift". That same day, before relaying what she said to others in this community, I emailed her the summary of our telephone call to make sure what I recorded/wrote down about the conversation was correct. These facts and wording we discussed and agreed on are not but need to be included in the final plan – as agreed. This is a major very long-term issue for this community, for this SPA, and for Sacramento moving forward. The problems must be clearly stated to ensure the related solutions are appropriate and effective. Presently the drafted plan is very general and vague on such problems and therefore solutions.

Historical perspective of long-term major and costly problems related to the huge PH projects in this SPA

The City's/ SHRA's 'Marina Vista' (actually overlooks the I-5 freeway, not the river or the Miller Park marina) “MV” was previously called "Seavey Circle”. The name change was made to try to disassociate these PH projects from the many major and costly problems there for decades; but the problems continue. MV is THE largest PH projects in the entire Sacramento region. The AG PH projects are the second largest in the entire Sacramento region, and located only several blocks from the MV PH projects. Both the MV and AV PH projects are among the largest in the entire Western United States. Neighbors have faced some very unsafe and trying times living near these two large PH projects. This over-concentration of PH housing in this one little Sacramento area has resulted in many major and costly problems over the four decades we’ve lived here. Below some of those problems are detailed. It's great that the City is trying to plan to actually make some major improvements in the area. It’s been a long time coming. Politicians and others have promised positive change over the decades, but not delivered. Those promises and the resulting hope were the reasons many homeowners in the area stayed. They had invested a lot of time, money, and effort trying to help improve this community. They want the less fortunate to obtain effective help, including housing.

Again, these two failed last century PH projects have caused major costly problems for MANY decades. Again, in 1990 the SACPD said this was the most dangerous area in all of Sacramento because of these old-style huge PH projects. During the early 90’s the great SHRA Director - Betty Turner - told us neighbors (working with her on the MANY major and costly PH project related problems) that placing so much PH in this one little Sacramento areas (both MV and AG) was an old, prejudiced, and failed idea/practice. Ms. Turner told us the future in Sacramento should be about substantially reducing the PH concentrated in this one little Sacramento area, and about integrating PH (with less in any one little area) and other affordable housing using fair share and effectiveness principles into MANY good areas of Sacramento, and nearer better schools, transportation and jobs. SHRA Director Turner sagely warned that NIMBY by more powerful Sacramento areas, related political pressures, and funding constraints could hamper such progress. They certainly have. Decades later, are Sacramento government officials, CDD, and others still considering or planning to keep all of the 751 PH units (about 44% of all such SHRA PH units in the entire City limits) in this little Sacramento area/neighborhood, this SPA?

The draft plan is not clear on this major problem “elephant in the room” for this area. And that 751 housing units does not count the additional 75 low-income units right next to the MV PH projects. When the original Land Park Woods (LPW) (fka "Camellia Commons") apartments were built, the City promised the neighbors the apartments/housing would ALWAYS be ONLY for seniors. Neighbors then agreed to these apartments being built right next to their homes, knowing that seniors create less risk for the community. But the City PH projects got so bad in the 90’s that the seniors left these LPW apartments. Many home owning neighbors also sold and left. The City and SHRA told neighbors that tax credits for more low-income housing for all low-income people was the only funding available. So more persons facing poverty and many problems in living, with so many needs, many that were troubled single parents raising young children were crammed into this already very fragile and problematic environment. For MANY decades this community has faced the resulting major and costly problems from such overconcentration of low-income housing in this one little area of Sacramento. Those throughout Sacramento needing a helping hand up have been crammed in these two huge warehouse style PH projects, and thus faced unnecessary risks and problems. They deserve far more effective housing.

The history section of this current draft plan should, but does not, contain information on these past prejudices related to these PH projects, and the resulting major and costly problems for the many decades since in and near this SPA. Such historical facts should be added to make the plan clear vis a vis what major changes are proposed for these two PH
project sub areas/housing, and why. This plan should clearly state the fact that this SPA contains far too many housing units for those with extremely/very low incomes, and that such over-concentrations are harmful.

Modern research/evidence is clear: (e.g., HUD Evidence Matters – Understanding Neighborhood Effects of Concentrated Poverty:
https://www.huduser.gov/portal/periodicals/em/winter11/highlight2.html
Placing too much public housing in one little area results in major problems. Neighborhoods of concentrated poverty isolate their residents from the resources and networks they need to reach their potential and deprive the larger community of the neighborhood’s human capital. Research shows cramming too much PH in any one area – overconcentration- creates communities with serious child neglect, crime, delinquency, unemployment, substance abuse and other mental health disorders, and other major and costly problems that, in turn, further restrict the opportunities of those growing up and living in them. It’s warehousing those in need. The impacts of neighborhood poverty rates on creating these problems increase rapidly if a neighborhood exceeds about 20 percent poverty. It appears but is not clear that this plan will result in far greater than 20 percent of all housing units still being for those facing poverty. The plan should provide an estimate of the overall percentages of the estimated 4,900 units that will be for those with extremely low income, very low income, etc.

The final City/CDD plan should clearly state that the long-term plan is to reduce this past prejudiced and problematic overconcentration by redistributing at least 50% of these existing 751 PH units into other Sacramento areas with little to no such housing using fair share principles. About six years ago, that is what SHRA told neighbors they would do. The CDD plan should state that this SPA area now contains over 44% of all such SHRA public housing units in the City limits – two of the largest old-style government PH projects in the entire Western United States. Those are important relevant facts. The plan should also state that in such integration work the existing PH residents will be provided help/rights in relocation to these new areas/units outside the SPA. The plan could then transition effectively into the existing draft plan discussion of moving some of the remaining existing low income housing out of the two previous specific PH project subareas and integrating it in other subareas in the overall SPA. The plan would then be clear that it wasn’t simply performing a “bureaucratic shuffle” in the area, “rearranging deckchairs on a titanic” by simply trying to relocate some of the 751 PH units to other subareas in the SPA, but planning on keeping all 751 PH units in the SPA.

Here’s more detail on just one problem mentioned above -crime. Cramming both of Sacramento’s two largest two PH projects into this one little Sacramento area has added substantially to high crime rates in this area for MANY DECADES. The online SACPD crime mapping tool documents the following types of serious crimes in these two PH projects in just the past year. There are about 300 listed, many often, many major, costly, and very harmful crimes:


SACPD and others (e.g., UC Davis Study) report that many crimes go unreported in these two dilapidated and over-concentrated PH projects for fear of retaliation, so these crime counts are conservative. The police can only really mop up/react to the underlying problem – the overconcentration of poverty/PH in this one little area of Sacramento that has caused a bad environment to live in, and major and costly problems for the surrounding community and taxpayers. SACPD reports that crime in the surrounding neighborhood is also higher. And the costs to SACPD decade after decade to respond and stand in harm’s way to such crimes are very high.

Moreover, this drafted plan should mention the failing performance of the elementary school in this SPA and the relation to the overconcentration of PH. Placing so much PH in this one little area, with so many children facing so many needs
and challenges has created a horrible learning environment for the children in this SPA for MANY DECADES. While many other strategies besides reducing the PH concentration have been tried, and much funding spent, the school’s bad performance continues.

Neighbors in/right next to this SPA have also previously shared information with the City CDD on many major, costly, and continuing (for decades) problems related to these PH projects, this harmful housing/community environment. There is no good reason this plan does not at least summarize some of these major and costly problems to make plan readers (including those living in this community, City officials, and developers) understand not only what is proposed, but why. Without this SPA plan providing such information on these present and long-term major and costly problems, the context and purpose of proposed changes made in the plan are not clear and really understood. Therefore, the draft plan is not focused on the best really effective housing and community vis a vis the full range of environment challenges.

In 2016, the State Office of Environmental Health Hazard Assessment (OEHHA) ranked the area contained in the SPA as among the most polluted and negatively impacted by socioeconomic challenges in the entire County and State. OEHHA develops problem indicator scores related to its environmental health hazard risk assessment work. The following are specifics: Impaired Water -97%, Hazardous Waste 94%, Groundwater Threats 93%, Rent Adjusted Income 93%, Unemployment 89%, Poverty 86%, Traffic 83% and Diesel 83%. OEHHA also said other high pollution burden percentile scores can be related to a number of factors including but not limited to the I-5 freeway on the west side of this tract/neighborhood. We did not see anything in the draft EIR about the I-5 freeway pollution, and that placing so much housing - much for the less fortunate with many children with other existing health risks -next to such pollution is unhealthy and costly in the long run. The overconcentration of PH in this area drives OEHHA’s indicators of high poverty and unemployment. This OEHHA work/these findings have previously been shared with the City CDD Office. All these very negative environmental findings should be mentioned in this plan and EIR, and help drive the plan’s conclusions and recommendations for improvements in this SPA.

This draft EIR fails to include/address all/most of the bad socioeconomic environmental health hazard conditions that OEHHA says are extremely bad for those living and growing up in this area. We consulted with a Yale and Stanford educated lawyer very knowledgeable in EIRs. He advises that an effective and complete EIR for this SPA must also include socio-economic considerations:

“In general, the issues you cite are right within CEQA, which requires a close look at any “project” that might have an impact on the environment. Environment has been broadly defined, much to the dismay of developers and, indeed, government agencies trying to do things.”

“There’s some controversy about whether CEQA covers socioeconomic impacts, but there is authority that they’re covered. This is from the CalTrans Handbook: Economic or social effects of a project may be used to determine the significance of physical changes caused by the project. Although primarily directed at physical changes, CEQA regulations require that socioeconomic consequences of the physical change be analyzed. This means evaluating the impacts on an existing community, on religious practices, and on business activity brought on by the physical changes directly related to the project. For additional information regarding social and economic effects, please see see Volume 4 of the Environmental Handbook, for example: http://www.dot.ca.gov/ser/vol1/sec5/ch36eir/chap36.htm#required.”

While PH should represent a public commitment to provide safe and stable housing for some of the lowest-income families in this country, severe underfunding and substandard conditions have repeatedly breached that commitment. The underfunding of PH has impacted the health and well-being of residents, who in study after study report poorer health and increased levels of environmental hazards because of substandard housing conditions.

**The Promise and Peril of HUD's RAD Program — Shelterforce**

https://shelterforce.org › 2018/07/30 › the-promise-and-peril-of-huds-rad-...

Jul 30, 2018

This publication also says one RAD requirement is that “Any residents who are temporarily relocated during any construction or repairs at the property have the right to return to the property after the repairs are completed." Again, this is a 20 year ‘plan’. The draft plan says the longer-term plan (e.g., after about 12 years) is to demolish all housing units on both PH land sites (AG and MV) and rebuild and create a mixed-income community. But for the next 12 years or so, the draft plan says SHRA is trying to/will convert the PH projects to HUD funded “Rental Assistance Demonstration Programs”
(RAD). While the draft plan says RAD converts the units to project based Section 8 rental assistance, the plan should describe a little more about what RAD is, what requirements it creates, and how the RAD funding requirements will fit with the subsequent longer-term plan to demolish all 751 of these old PH project units, and rebuild/redevelop these two subareas area into a mixed income community. No information in the drafted plan is provided on what that 12 year “keep things as they are” period means for the residents presently living there or for the surrounding affected neighborhood. These concerns include if there will be effective management of all these concentrated rental units for the desperately poor during this long 12 year “RAD phase”. There has not been adequate management of these City/SHRA housing projects – as evidenced by many of the ongoing problems for many decades. As one other example, during 2018 it took MANY calls and emails from concerned neighbors to the City for MORE than 6 months to get them to fix and get ALL the 5th Street lights on the whole east side of the crime ridden MV projects – they had ALL been out or almost a year on that side of these crime ridden PH projects. About a block from there a year or so earlier, a homeowner neighbor had a bullet come through her kitchen window and lodge in her refrigerator – from the nearby MV PH projects. Sher was so worried and anxious - what if that bullet had instead come through her other front window - that of her young daughter’s bedroom? This “dark NO City street lights fixed area for almost a year” area is where there was an attempted murder of a SACPD patrolman during 2019 at these MV projects, and where many other crimes frequently occur. Neighbors fear such lack of management could get even worse. How can we trust the City and SHRA on their long-term plan promises of proper management and oversight when our SACPD, families, and so many needing a helping hand up are so often, for so many decades put at risk by the City and SHRA not properly managing and overseeing their failed overconcentrated PH projects in this SPA? How can we trust the City with their long-term plan for “improvements” for this area, when they make NO mention of such major and pervasive problems in their long term plan?

Twelve years is also a very long time for the City to leave all these failed, dilapidated, unsafe, and harmful PH units concentrated here in this one little fragile neighborhood that has already suffered so much for so long. Evidence is clear that the existing PH is far from effective and helpful for those living in this PH, in this environment -especially for the children. Moreover, we do not want the City to again “kick this major existing overconcentration of PH down the road,” and then never accomplish the reduction in PH in this SPA. There are no such assurances against that in this drafted plan. Many times, after decades, the City has dropped real plans for progress because “no funds were available”, etc.

The plan should state, but does not, why the City and SHRA are waiting so long to demolish and rebuild the two PH project subareas, and create the new safe and healthy mixed income housing/environment. Twelve years is also a long time to leave the PH residents and surrounding community in this existing higher risk and negative environment. Furthermore, fixing up, or even maintaining, the dilapidated and unsafe 751 housing units for 12 years will also cost A LOT and seems like a major waste of taxpayer money when the plan is to then demolish all of these housing units. For example, present maintenance costs taxpayers $1,000,000 or more a year for these two failed soon to be demolished PH projects. We saw one SHRA report showing almost $5 million for just one year for maintenance! Isn’t this “throwing precious and good taxpayer funded money after bad”? Sacramento City officials told the federal government/HUD during 2015 that these housing projects needed AT LEAST $100 MILLION in work right away if they were going to be left standing, because these two PH projects are so dilapidated and uninhabitable. The Sacramento City government detailed major structural issues (e.g., not safe in an earthquake – putting housing tenants and their children at risk), leaking sewage and plumbing not fixable as it is so old; same with electrical, major black mold problems, etc., etc. No funding was obtained and none of these major health and safety problems have been fixed. None of these 2015 City findings seem to be included in this latest CDD draft plan. The plan should inform readers of the major current problems needing major work/solutions. These findings also support the CDD conclusions in this draft plan that the existing PH buildings need to all be demolished and new housing units built there. Without providing such facts, the City plan may lead many uninformed readers to wonder why the City government is tearing down what would be perceived as fairly good and safe brick housing structures that were built using so much precious tax funding. Some neighbors perceive some of the MV PH project units to be in the worst shape and most dangerous. Are the latest City’s findings that all housing units at both PH project subareas are too dilapidated and unsafe to maintain long time? The plan should provide such information to support the plan conclusions/recommendations.

Moreover, the final plan should clearly provide information on if the longer term plan allows all 751 units now earmarked as PH to remain in the new rebuild for the AG and MV subareas, or if a certain number of those PH/very low income units would be instead moved to other Sacramento areas with little to no PH/very low income housing (e.g., using fair share distribution and integration principles) to reduce the substantial overconcentration in this SPA. We strongly recommend the City explicitly state that the longer-term (e.g., about 12 year) plan, and sooner if possible, is for a substantial reduction in the PH in this overburdened little Sacramento area/SPA. “Substantial” should be objectively defined/measured. We
strongly recommend that the plan state "At least 50% of the existing PH units shall be relocated out of this SPA to create a true mixed-income community. Moving at least 50% of the PH units out of this SPA will be done without negative impact to the existing PH residents and accomplished through attrition and voluntary relocation".

Sacramento is planning to increase overall housing, including that which is subsidized/affordable. However, this SPA/community should not continue to be used unfairly as an area to cram in far more than a fair share of Sacramento’s planned PH and other low income/affordable housing. City government has already done that for about four decades, with very negative and costly consequences. Fair share principles must be espoused and applied in this plan. For instance, is the City planning to build as high a percentage of PH and other low income/subsidized housing in the huge Railyard area downtown that is far closer to jobs and effective public transit? If not, why not? Is the City planning on instead using this “West Broadway” SPA and community unfairly to “do far more than its fair share” in meeting entire citywide needs and goals - by cramming in even more low income housing, rentals and very small homes in this SPA? That would continue the unfair and prejudiced practices this SPA community has faced for over seventy years already. We don’t assume so, but the plan is not clear and needs to be. We know that NIMBY by other more politically powerful areas/neighborhoods in Sacramento have created barriers to fair share integration for way too long. Such unfair development in this SPA would further reduce the stability, quality, and value of this already overburdened, troubled, and fragile community. Such concerns need to be addressed in this plan.

This draft plan says it will rely heavily on SHRA’s/City’s previous November 2015 “Transformation” plan to HUD for the build out of the land where the AG and MV PH projects now exist. That previous 2015 plan was opposed by the vast majority of nearby homeowners in that community and was never funded. Thank goodness. That previous plan proposed either 1200 (and costing about $279 MILLION “up front”) or 1500 units (and costing about $383 MILLION “up front”) with total finals costs at over HALF a $ BILLION! And these huge costs were before the new increased residential construction costs and the new (January 1, 2020) solar power requirements that will increase the new plan costs. Both plans relied very heavily on taxpayer funding. Both plans relied heavily on borrowed money and long-term debt obligation. Both plans relied on funding tied to developing low income housing units (e.g., low income tax credits). Therefore, both plans would have resulted in total long-term final costs being far greater (e.g., about double) and almost all of the housing being low income housing units - creating an even larger concentration of low- income units and persons facing poverty in this one tiny, fragile and crime ridden Sacramento area. And almost all the proposed housing would have been rentals in an area with far too high a percentage of rentals already.

More ownership should be fostered to help stabilize this community. And that 2015 City/SHRA plan gave no assurances that ANY of the existing PH would be moved and integrated into any other Sacramento areas (e.g., with little to no PH, using fair share principles). SHRA and the City started saying that other good neighborhoods throughout Sacramento with little to no PH were opposed to accepting any PH, so all the PH therefore had to stay where it was. However, even the City Council admitted several years ago that the 2015 proposed increase to 1500 units was too many there and required too much and unavailable government funding. Is the City leadership now flip-flopping and planning 1,610 total units on these two SPA subareas? This change in City direction should be explained in this plan.

This drafted plan says both the AG and MV subareas will be “mixed income”. But it is not clear, and should be, if the City (which now has authority over SHRA) is planning on keeping most if not all the existing PH units/tenants there, and simply heaping on more low income, lower level working housing units, and some for those with somewhat higher income. Or is the City plan to relocate a substantial portion of the 751 PH project units to other Sacramento areas using fair share principles, to create a true mixed income and economical viable community in this SPA? If the present overconcentration of low-income housing units is kept there, then related socioeconomic problems described in this document will continue. Further this plan likely won’t work to attract and retain business along/near Broadway, and won’t be economically viable.

The plan should provide at least rough estimates of what percentages of the total housing units on these two subareas will be government subsidized and for extremely and very low income, low income, etc., and on the other hand what percentage market rate including lower priced and higher priced for ownership and for rental. The draft plan’s vague wording makes it seem like (but is not clear) some of the extremely and very low-income units NOT moved out of the entire SPA would at least be moved from the two existing PH project subareas to other subareas in the SPA. The plan should also be clear on this intent.

Moreover, the draft plan provides NO information on if all housing units in these two subareas will all/mostly be rentals. The plan provides no information nor any recommendations on if a fair percentage of home/unit ownership in these two subareas is supported. The City’s long-term plan certainly should support more home ownership. Will working folks with
incomes and alternates even be allowed to buy and own, let alone choose to live here long term, or will community instability continue with frequent rental and “move up” turnover? The oversaturation of this SPA with PH and rentals is a MANY decades old problem that should be acknowledged in this plan. Recommendations to fix those problems should be provided. The present draft plan does not clearly mention such problems, and is then ambiguous in what is said. Please clarify and provide more meaningful information on this in the final plan. The present draft is unacceptable on these issues.

The draft plan says the longer term (e.g., after about 12 years) plans are to demolish all the existing buildings/PH project housing units on the AG and MV subareas, and then more than double the housing units on the same acreage - cram 930 units where the 360 AG units are now, and 680 where the 391 MV units are now. The plan is to cut down a significant number of the large established shade trees and substantially reduce the open green areas in these two PH project subareas to make room for a lot more housing units. The plan should be changed to save as many of these large trees as possible, even if it means reduced housing densities. “Alder Grove” speaks proudly of the ample trees in this area of the SPA. Ample green space should also be maintained. These mature shade trees and open green spaces add substantially to health benefits, property values, and quality of life for those in this community. The MV subarea is already crammed in right next to the I-5 Freeway with substantial air and noise pollution. These facts are not mentioned in the plan and EIR, and should be. The Sacramento Tree Foundation and many others advise that such mature trees help significantly with such pollution and noise. They also inform that those living in lower economic areas suffer from far less mature shade trees in our hot and getting hotter region. While the draft plan calls for planting new replacement and other trees, again, receiving and enjoying the many benefits of larger established trees would take many decades. Therefore, this present drafted proposed plan is unfair and insensitive to major populations the City is trying to help.

Neighbors have lost trust with the City related to the issue of valuing and saving as many larger trees as possible. For example, in the last several years a developer rushed to cut down almost all trees on the parcel of land next to the I-5 freeway that is immediately south of the SPA and just west of the land with the oldest home in the whole general Land Park area. Noise from and sight of the endless vehicles on I-5 has increased substantially, decreasing the value of nearby properties and the health benefits and quality of life for nearby neighbors. Almost three years later the land is still undeveloped, and left -now- clear-cut.

Moreover, the proposed new densities may add ‘insult to injury’ in these two areas where so much PH is already crammed in. It appears most of the units will be very small -700-1000 square foot. While the surrounding homes are not large, making all or most of the new housing units so small suggests the housing will be very dense and focused primarily on being lower priced affordable housing and rentals. An overconcentration of very small housing units would not be conducive to creating a true mixed income community, and would not integrate effectively with the existing surrounding neighborhood. The plan should clearly state that a substantial percentage of larger market rate apartments and homes will be included in each of the two (previously PH project unit only) subareas. The plan should clearly state that an ample number of owner-occupied homes will be included in these two subareas to foster longer term commitment to living there, and community and socioeconomic stability. They are crucial to creating a true mixed income stable community. Owners occupying homes also serve as role models. Many decades ago, Mayor Joe Serna proposed the idea of trying to find funding to support some of the PH project tenants - that ended up with ample employment and somewhat more income - to stay, own, and occupy some of these units in those PH project subareas, to serve as positive role models and create community stability. This community should not continue to be a revolving door where those that are successfully “lifted up” and get good employment, etc. leave, and where then new folks facing poverty and many other problems in living and serious needs continuously replace them.

That PH project model has failed and created major and costly problems for the tenants, the surrounding homeowners, and the taxpayers. Moreover, while the present draft plan is to more than double the number of housing units, the actual increase in housing densities on these two subareas would be much greater if a truly mixed income and stable community is the goal where a fair percentage of housing units are larger, since all the existing PH project units are small.

The final plan for this entire SPA should require one story housing and other buildings right next to existing neighborhood homes and then increased heights and densities as the new construction is further away, and closer to Broadway – again to be fair and supportive of the existing neighborhood, and to reduce negative effects (e.g., privacy, noise, traffic, pollution) of those living and working in the newly constructed buildings. The final plan should also call for only one-story housing units on the MV subarea that are right next to the I-5 freeway sound wall. This accommodation would reduce noise and other negative effects for those residents. No established trees should be removed, and many more trees (mostly evergreens for year-round effectiveness) and large bushes planted along/by the I-5 freeway sound wall on the
west to increase health and reduce negative effects from the I-5 freeway. The final plan should reflect the fact that it is not right to place low-income housing right by the I-5 freeway since this population - often with many children, already faces increased health risks.

Long before the City released this draft plan, neighbors already provided the City much of the information about these problems. Lawyers can get involved if the City continues to be dismissive of such important community input and major concerns, if the final City plan and EIR do not address such problems and do not then provide meaningful plans and effective remedies for such real and major problems.

This draft plan is still very general and very vague at times about major parts of what will actually be developed long term. The City has not even provided this community with cost and financing estimates. These are critical to a clear and understandable plan – especially one of this size, scope and costs – including to taxpayers. Plan implementation can easily cost BILLIONS of dollars, especially when government funding including tax credits and long-term debt obligation costs are accounted for. The Finance Plan and summary in Chapter 10 of the final version of this drafted overall plan should include cost-benefit analyses of the various options considered and decided on by the City. Chapter 10 in the draft plan just says the Finance Plan is not complete and will be released later as a separate report. No large, important, and ambitious plan like this is near complete, real, or comprehensible without knowing at least some about the rough estimated costs and financing options. Again, the final deadline for public input into the City’s (CDD’s) overall plan for this SPA should be extended from February 10, 2020 until after the drafted Finance Plan is released to the public. This community’s request for an input extension was previously emailed to the CDD Planning Office on 12-31, 2019 8:38 am. The final plan report (e.g., Chapter 10) should at least summarize estimated costs and possible funding from the Finance Plan that the City plans to publish and release under separate cover. The Finance Plan and summary in Chapter 10 of the final version of this drafted overall plan should include cost-benefit analyses of the various options considered and decided on by the City.

**Example of some cost savings estimates/ideas “thinking outside the box” of the present draft SPA plan**

When Sacramento’s two largest existing dilapidated, failed, and harmful PH projects here are torn down to make way for new energy efficient and effective housing construction, there is a major opportunity to realize taxpayer savings by placing a substantial number of the existing 751 PH units in other Sacramento areas with lower land costs, and profiting from selling the existing high priced acreage for market rate housing. The 751 PH units now sit on over 70 acres of some of the more expensive land in the City limits. Relocating much of the PH to other lower cost land in Sacramento could raise MANY $MILLIONS.

Here’s a very rough and incomplete list of some other related annual cost-savings estimates for the City:

- City collects about $3000 per year per new market home on property taxes, and increased amounts on about 1000 existing nearby homes as their value subsequently increases (home values near PH projects are lower than homes further away in area). That’s $MILLIONS.

- SHRA spends millions trying to prop up these dilapidated PH units. One SHRA report documented about $5 million for just one recent year for maintenance. That’s $MILLIONS.

- SACPD policing costs are easily $500,000 a year on the 751 PH units alone. Counting effected neighborhood doubles that for $1 MILLION.

- The decades of very bad elementary school performance in this SPA results from the over-concentrated PH. This costs students, parents, teachers, City taxpayers and others dearly every year. There have been many less than successful but costly and frustrating attempts at improvements.

- City could pull in major funds from building permits, etc. etc. – Many $MILLIONS more.

This list is inchoate and rough, but the takeaway is clear. A final plan for this SPA must take into account limited and precious taxpayer funding, and what is most efficacious for Sacramento, including costs, possibly savings and benefits of each housing option.
Thinking “outside the box” of what the draft plan for this SPA recommends now, here’s one other idea/rough proposal for related really positive and healthy change related to the PH overconcentration in this SPA. Fix up and maintain the somewhat nicer and historical AG PH units. Don’t demolish these old historical brick buildings, but rehab them, if it turns out to be cost effective. Remove the dilapidated unsafe MV PH units, and replace these housing units on this high cost land with market rate non-rental housing. Use the cost savings from selling the MV land for market rate homes and from rehabbing the AG brick buildings to help fund and replace this failed MV PH project with smaller and effective PH “villages” (100 or so safe, modern, and energy efficient PH units in any one location) integrated throughout Sacramento. This will also help create overall stability in the SPA community. Use Measure U funds to help. This SPA would still have more PH than any other Sacramento area, but could recover and thrive. In addition to cost savings and increasing tax revenues for the City, such a plan would support the fair share distribution of PH that is equitable and far more effective.

In any case, the final City plan for this SPA must be prepared in the context of an overall fair and cost-effective plan for such PH and other affordable housing throughout Sacramento and the region, and in relation to limited overall funding and scarce and precious taxpayer dollars.

**Plan is good and cost effective to keep Land Park Woods low income apartments as is**

It is good and cost effective that the new drafted plan recommends no real changes to the Land Park Woods (LPW) low income apartments in the SPA. It was wrong that in the past the City converted these apartments to all age all low-income units since this area already shouldered far more than its fair share of PH. But, these additional 75 LPW low income apartments right next to the MV PH projects have now received about $25 million in low income tax credits and other government/taxpayer subsidies in the last couple decades. They are now pretty nice and safe, and should stay long term as is. The “Woods” in the apartment name speaks honestly to all the many and beautiful big trees preserved throughout the complex during the apartment construction, affording shade, and increased health benefits, value, and quality of life for those living there, and the surrounding neighborhood.

In fact, the 75-unit Land Park Woods apartments serve as a good example of the smaller “village” concept of integrated low-income housing that should be integrated into many other Sacramento areas near existing established homes and neighborhoods utilizing the fair share principle of spreading out such housing throughout Sacramento City AND County. Of course, such a vision seems at odds with the present City plan for this SPA, to build higher and dense housing structures close to existing established neighborhoods. It is appreciated that the draft plan calls for building somewhat lower density and height housing units near existing neighborhood homes to reduce negative impacts including privacy. Certainly, there should also not be multi-storied (e.g., 35-foot high) buildings placed right next to the LPW low income apartments or any other existing homes in this SPA.

**Some comments, recommendations for drafted plan for other subareas in SPA and for entire SPA**

The drafted plan says the total housing units for the whole SPA will be about 4,900. The plan says the building height limits are planned for 35 ft in the AG and MV subareas, 65 ft for the Broadway area, and 250 ft for the River Gateway area. Hopefully the City officials, planners and developers will improve this community long term, not create a much higher density urban living area, yes with more housing for Sacramento but also with far more traffic and many other problems too near the old established neighborhood there, to mostly attract government low income and other subsidized affordable housing funding, and increase developer profit opportunities. The final plan including planned funding sources will help tell what this MULTI-BILLION-dollar SPA development will become.

The drafted plan offers some exciting/positive suggestions for Miller Park. Certainly, removing the nearby petroleum tanks and relocating them outside this SPA is a major improvement! But much of the section on the Miller Park improvements are coached in tentative language, -as if much of it may not actually happen. We have seen this lack of follow-through by the City on the previous riverfront improvement plans over the decades. Neighbors are understandable skeptical on if such positive plans will ever be implemented. Sacramento leadership has a very long history of drafting plans for riverfront improvements in this area, but have seen few actual improvements. This community is also skeptical about the City politicians supporting West Sacramento’s desire to build a bridge across the river there. Such a bridge may create major problems (e.g., major increases in traffic, pollution, and noise) in and near that park area and the nearby old established neighborhood in this SPA if a larger bridge is built, and if a smaller bridge does not include ample space for bicycles, pedestrians, and other non-motorized transportation. Certainly, the thought of a large bridge and high rises near there with height limits of 250 feet is not advantageous to those long-term residents trying to live and raise families here, or to creating a truly improved, healthy, and tranquil park setting that often serves as an inexpensive close-by stress-reducing
urban retreat for the many and for families, that are not able to spend a lot of money and time on longer and more distant vacations and “getaways”.

This draft plan contains a lot of fairly vague and unclear information on what will actually be built. For instance, while the draft report is chock full of specifics on such plan specifics as architectural design, street and sidewalk placements and width, etc. etc. it is far from clear if the resulting overall housing in this SPA will be an unfair and harmful high percentage of low income, rentals, and very small units. Many members of the community in this SPA have fought a lot of adversity (detailed above) over the last four decades since too much of Sacramento’s total PH housing was unfairly crammed in here. This community, nevertheless has worked extremely hard to make and maintain improvements over many decades, to make this a safe and desirable area to live long term and raise families. The plan should make it clear that such very hard work by this community and the resulting positive changes will not be diminished but increased if the final plan is implemented. More positive changes for the major problems in this SPA will take time. A 20-year long term City plan is warranted. However, as stated earlier, the real underlying causes for the present rises in homelessness and lack of affordable housing may be related more to national problems of wealth distribution, pay inequality, and other socioeconomic factors reducing our middle class and creating more folks facing poverty with desperate needs. The permanent “solutions” the City’s drafted long-term plan offers for this SPA seem to focus on much higher and dense, very small housing units with a high percentage being rentals and/or government subsidized affordable housing. In the long run these proposed permanent City government “solutions” for this SPA may cause more harm than good for this community, especially if our nation overcomes some of the larger underlying national problems, and the middle and lower economic classes are not forced to permanently lower their quality of life expectations.

Last, this community is very concerned that when the present EIR is completed and approved (City estimating this Spring seems to be rushing it?) the City may try to make it very difficult for neighbors to have real input and alter subsequent and more specific bad plans and construction/development. The community fears that City politicians, SHRA and developers may do what is best/most profitable for them in the short term, while long term residents and taxpayers continue paying long term with increased costs and a reduced quality of life. The City should insert language into this plan and EIR that over the course of the two coming decades or longer of planning and development, further input from the effected community here will not only be allowed but encouraged. A lot of positive change for the area is needed, but is far from certain in this inchoate, often vague draft plan. Please continue to work with the effected community and seek more and more input on improvements to the actual implementation plans in the years and decades ahead.
To the City Environmental Planning Services:

Please include my comments in the official record for the West Broadway Specific Plan EIR.

My wife and I have lived in Sacramento since 1985 and bought our home on Muir Way in 1994 and have lived and invested a great deal of our time and money in our Land Park property. We love living in Land Park and would not choose to live anywhere else.

We live on Muir Way just past McClatchy Way and thus understand the New Helvetia Historic District quite well. We support public housing and affordable housing in our neighborhood. My understanding is there are currently 751 public housing units on Broadway and Muir Way just about two blocks from our home. We have lived peacefully and with few problems from public housing residents. Our concerns for this project are:

1. The proposed addition of 859 units of public housing in our neighborhood is putting the entire burden of public housing on the Land Park area of the City and basically no where else. This does not seem equitable and raises questions about the intensity of the density. Traffic was such a problem on Muir Way more than ten years ago that the City finally installed speed bumps which we really appreciate. Increasing the housing and the density in Land Park will be a real challenge for the high volumes of traffic that already exist on Broadway, Land Park Drive, Muir Way and Riverside Drive.

   Please reconsider the density (which adds nine to ten thousand new residents in our neighborhood) and lower the overall density (by at least thirty percent) of public housing and affordable housing units in the West Broadway Specific Plan so that all the residents of Land Park can continue to enjoy a high quality of life and preserve a long and hard fought truly great neighborhood.

2. The proposal to have Muir Way be connected to Eighth Street and to deliberately direct traffic down Muir Way is a terrible idea and will increase traffic volumes on Muir Way. There are already hundreds of units of public housing on Muir Way in the Alder Grove part of the property owned by SHRA which means there is already considerable traffic on Muir Way especially between McClatchy Way and Broadway. Encouraging traffic from Eighth Street all the way through to Muir Way has never been done before because it would completely change Muir Way and all of Upper Land Park traffic volumes and patterns of travel.

3. The proposed bridge connecting Sacramento and West Sacramento on Broadway seems like a good idea until you read the West Broadway Specific Plan which eliminates a travel lane of traffic in each direction on Broadway at the same time the City proposes to increase traffic by building a bridge and creating a direct line of travel down Eighth Street which then would turn into Muir Way.

   How can you eliminate lanes of travel on Broadway and build a bridge and connect Eighth street to Muir Way all at the same time without creating a significant increase in traffic along Broadway, Eighth Street, Muir Way, Riverside Blvd, and Land Park Drive?? We are having a great deal of trouble understanding the logic of the Specific Plan as it relates to traffic and service levels at key intersections.

Thank you for your consideration regarding our concerns for this West Broadway Specific Plan. We support public and affordable housing but also want to have equity with all neighborhoods in Sacramento and not have the entire burden of public housing or affordable housing for the City be in Upper Land Park.

Sincerely,
Michael Rock and Courtney Krakie
2765 Muir Way
Sacramento, CA 95818
Dear Ron,

Thank you for calling me back today. I would like to formally request a one-week extension on the comment period for the West Broadway Specific Plan DEIR (SCH No. 2018072032). The DEIR was sent to our North Central Region in the Rancho Cordova office, but the project area also falls within the Bay Delta Region, specifically the sections of the project area that are west of Interstate 5. Please see the attached jpg for a map, and I also have kmz files if that would be helpful for you and your team in the future.

Because we didn’t receive the DEIR within the normal timeframe we are requesting a one-week extension to provide comments. This would allow us to send our letter to you by February 27, 2020 instead of February 20, 2020.

I appreciate your time and consideration.

Regards,

Jeanette N. Griffin
Environmental Scientist
CA Department of Fish & Wildlife
Bay Delta Region: Habitat Conservation Program
2825 Cordelia Road, Suite 100, Fairfield, CA 94534-1377
Phone: (209) 234-3447
Fax: (209) 234-3455
Jeanette.Griffin@wildlife.ca.gov
March 6, 2020

Mr. Ron Bess, Assistant Planner  
City of Sacramento, Community Development Department  
300 Richards Boulevard, 3rd Floor  
Sacramento, CA 95811  
RBess@cityofsacramento.org

Subject: West Broadway Specific Plan, Draft Environmental Impact Report,  
SCH No. 2018072032, City and County of Sacramento

Dear Mr. Bess:

The California Department of Fish and Wildlife (CDFW) has reviewed the draft Environmental Impact Report (EIR) for the proposed West Broadway Specific Plan (Project or Plan) pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines. In accordance with our mandates, CDFW is submitting comments on the draft EIR as a means to inform the City of Sacramento (City), as the Lead Agency, of our concerns regarding potentially significant impacts to sensitive resources associated with the proposed Project.

CDFW ROLE

CDFW is a Trustee Agency with responsibility under CEQA (Pub. Resources Code, § 21000 et seq.) pursuant to CEQA Guidelines section 15386 for commenting on projects that could impact fish, plant, and wildlife resources. CDFW is also considered a Responsible Agency if a project would require discretionary approval, such as a California Endangered Species Act (CESA) Incidental Take Permit (ITP), a Lake and Streambed Alteration (LSA) Agreement, or other provisions of the Fish and Game Code that afford protection to the state’s fish and wildlife trust resources.

REGULATORY REQUIREMENTS

California Endangered Species Act

Please be advised that if the Project has the potential to result in “take” of plants or animals listed under CESA, either during construction or over the life of the Project (Fish and Game Code, § 2080 et seq.), the Project must demonstrate compliance with CESA, either through full avoidance measures or obtaining take coverage through a CESA ITP. Issuance of a CESA ITP is subject to CEQA documentation; therefore, the CEQA document must specify impacts, mitigation measures, and a mitigation monitoring and reporting program. If the Project will impact CESA listed species, early consultation is encouraged, as potential significant modification to the Project and mitigation measures may be required in order to obtain a CESA ITP.

CEQA requires a Mandatory Finding of Significance if the Project is likely to substantially restrict the range or reduce the population of a threatened or endangered species. (Pub. Resources Code, §§ 21001, subd. (c), 21083; CEQA Guidelines, §§ 15380, 15064, and 15065). Impacts

Conserving California’s Wildlife Since 1870
must be avoided or mitigated to less-than-significant levels unless the CEQA Lead Agency makes and supports Findings of Overriding Consideration (FOC). The CEQA Lead Agency’s FOC does not eliminate the Project proponent’s obligation to comply with Fish and Game Code section 2080.

Lake and Streambed Alteration
CDFW requires an LSA Notification (Notification), pursuant to Fish and Game Code section 1600 et. seq., for Project activities affecting lakes or streams and associated riparian habitat. Notification is required for any activity that may substantially divert or obstruct the natural flow; change or use material from the bed, channel, or bank including associated riparian or wetland resources; or deposit or dispose of material where it may pass into a river, lake or stream. Work within ephemeral streams, washes, watercourse with a subsurface flow, and floodplains are subject to notification requirements. CDFW will consider the CEQA document for the Project and may issue an LSA Agreement. CDFW may not execute the final LSA Agreement (or ITP) until it has complied with CEQA as a Responsible Agency.

PROJECT DESCRIPTION SUMMARY

Proponent: City of Sacramento

Location: The proposed Project area is located in the City of Sacramento within the Upper Land Park neighborhood, south of the Central City, and across the Sacramento River from the Pioneer Bluffs and Stone Locks areas of West Sacramento. The Project area encompasses approximately 240 acres, bounded by the Sacramento River on the west; Broadway and Business 80/U.S. Highway 50 to the north; Muir Way and 5th Street to the east; and 4th Avenue and Merkley Way to the south. Interstate 5 travels north-south through the western portion of the Project area and separates Miller Regional Park and the industrial lands east of it from the rest of the Project area.

Timeframe: Unknown

Description: The proposed Plan is to provide for the orderly and systematic integration of land uses within the Plan area that is consistent with the City’s goals and maximizes opportunities afforded by the area’s proximity to the Sacramento River and the downtown area. More specifically, the objectives of the Plan are to: 1) accommodate growth that increases the long-term economic sustainability, equity and well-being, and protection of important environmental resources in the Plan area, 2) provide for the orderly and systematic integration of land uses within the Plan area that maximizes opportunities afforded by the area’s proximity to the Sacramento River and Downtown Sacramento, 3) facilitate new mixed-use development, reuse, and redevelopment within the Industrial Subarea lands along 1st Avenue and 5th Street, 4) promote new infill residential development and redevelopment within the Plan area that supports a mixed-income community and a variety of housing choices, including market rate and affordable housing options for low-income, very low-income, and extremely low-income households, 5) promote neighborhood-serving uses, including a grocery store and venue(s) for after-school programs and activities for area youth, 6) enhance public recreation, use, and waterfront access at Miller Regional Park, 7) enhance the West Broadway corridor as a future
gateway and bridge connection between the cities of Sacramento and West Sacramento, 8) leverage the planned improvements of the Broadway Complete Streets Plan to support economic growth and mixed-use development along West Broadway, 9) provide a gridded street network that improves the connection and access within the Plan area to surrounding uses and neighborhoods, 10) enhance bike and pedestrian travel ways through the Plan area to schools, public facilities, and neighborhood amenities, and 11) support and promote local businesses in the Plan area.

COMMENTS AND RECOMMENDATIONS

CDFW offers the following comments and recommendations to assist the City in adequately identifying and/or mitigating the Project’s significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources.

Comment 1: Notification under Fish and Game Code Section 1600 et. Seq. may be required
Proposed activities described in the draft EIR may be subject to Notification and CDFW may require an LSA Agreement, pursuant to Section 1600 et seq. of the Fish and Game Code. These activities include construction and operation of the bike and pedestrian bridge, enhancement of recreational activities including marina alterations, dredging, vegetation removal and management within riparian areas, and discharge of concentrated stormwater runoff into the Sacramento River as a result of expanded impermeable surfaces due to urban development. Please submit Notification to CDFW at the Bay Delta Region Office listed above for projects occurring west of Interstate 5, and at the North Central Region Office for projects occurring east of Interstate 5. To obtain information about the LSA notification process, please access our website at https://www.wildlife.ca.gov/Conservation/LSA.

Comment 2: Impacts from Project phasing are not included in draft EIR
Proposed activities described may have additional impacts due to Project phasing over time and are not discussed or evaluated in the draft EIR. Projects that include multiple phases with different sections or parcels built out at different time periods or phasing that includes whole-site grading with separate parcels developed at later dates have impacts over a period of longer than one year. This delay in full buildout allows wildlife to utilize resources that develop post-grading on vacant parcels. These resources include, but are not limited to, ruderal grassland and brush that provide nesting habitat for passerine birds, infrastructure installed but not utilized that provide burrowing habitat for ground squirrels, burrowing owls, and short-eared owls, and pooling of rainwater on parcels that provide temporary habitat for amphibians and invertebrates. CDFW is unable to analyze these impacts without inclusion of a description of the Project’s timing and implementation in relation to site preparation, infrastructure installation, and complete buildout.

To correct this deficiency, please update the draft EIR with a description of the projected phasing and estimated timeframes for each project specifically mentioned or outlined in the Plan from start of construction to complete buildout. If the Project’s timeframe from start of construction to complete buildout includes breaks in construction longer than 15 days or periods of inactivity that could allow establishment of habitat elements such as burrows and vegetation, then impacts to wildlife utilizing the parcels not built out must be included in the impacts analysis to ensure the Project mitigates impacts to less-than-significant. When and if such a delay occurs, and to
ensure the Project is mitigating to less-than-significant, CDFW recommends revising the draft EIR to include a mitigation measure that meets the following criteria: a qualified biologist shall conduct habitat assessment surveys to determine what wildlife are utilizing the vacant parcels, if vacant parcels are being utilized avoidance and minimization measures (including the measures discussed in this letter) shall be used to prevent impacts and take, and if impacts and take are not fully avoidable, additional compensatory mitigation shall be discussed and agreed upon with CDFW’s approval prior to the re-initiation of construction activities.

Comment 3: Mitigation Measure 4.3-1 does not define floristic survey protocol
Mitigation Measure 4.3-1 does not include defined survey protocols for floristic surveys.

To correct this deficiency, CDFW recommends Mitigation Measure 4.3-1 be revised to include adherence to the most current version of CDFW’s Protocols for Surveying and Evaluating Impacts to Special-Status Native Plant Populations and Natural Communities (2009), including the reporting requirements contained in those protocols, and to indicate the qualified botanist shall conduct the surveys according to the protocols.

Comment 4: Mitigation Measure 4.3-1 revisions needed to mitigate impacts to special-status plants to less-than-significant
Mitigation Measure 4.3-1 does not reduce impacts to a level of less-than-significant by identifying compensatory mitigation in the event impacts to special-status plants cannot be fully avoided, or requiring CESA compliance through take authorization in the event CESA-listed plant species will be impacted by Project activities.

To correct this deficiency, CDFW recommends Mitigation Measure 4.3-1 be revised to require compensatory mitigation for impacts to special-status plant species at a minimum of a 3:1 mitigation ratio (conserved habitat to impacted habitat) for permanent impacts. CDFW also recommends inclusion of language defining the Project’s obligation to obtain CESA-listed plant take coverage through an ITP issued by CDFW when take of Rare, Threatened, or Endangered plants, including Mason’s lilaeopsis (Lilaeopsis masonii), cannot be fully avoided.

Comment 5: Mitigation Measure 4.3-2a, b, d, f, and h revisions needed to mitigate impacts to fish to less-than-significant
Proposed activities described are likely to result in take of special-status fish species within the Project area, especially Delta smelt (Hypomesus transpacificus), Chinook salmon (Oncorhynchus tshawytscha), Central Valley fall/late fall-run Evolutionarily Significant Unit (ESU), Central Valley spring-run ESU, Sacramento River winter-run ESU, steelhead (Oncorhynchus mykiss iridus) Central Valley Distinct Population Segment (DPS), and green sturgeon (Acipenser medirostris) southern DPS. The middle of the rearing and migration of fall/late fall-run Chinook salmon, and the spawning, and incubation of winter-run Chinook salmon in the Sacramento River fall within the months of June and July. Due to the Project occurring within designated critical habitat for these species, and the CESA and Federal Endangered Species Act (ESA) status of these particular runs, allowing the in-water work window to start before August 1 increases the possibility of impacts to these protected species during a very vulnerable life stage. This includes direct and indirect take from bridge support pier installation, coffer dam installation and dewatering, barotrauma, short-term decreased water
quality due to Project-related turbidity and pH-altered runoff from curing concrete coming in contact with the Sacramento River, and long-term decrease in water quality due to increased urban runoff leading to increased pollutant concentrations and sediment runoff.

To correct this deficiency, CDFW recommends Mitigation Measure 4.3-2a: Conduct a Hydroacoustic Effects Analysis be revised to incorporate adherence to the accumulated sound exposure level (SEL) threshold of 183-decibels (dBA) at 10 meters and single-strike peak SEL to not to exceed 206 dBA at 10 meters to avoid impacts to Delta smelt. If exceedance is expected after the Hydroacoustic Effects Analysis specified in Mitigation Measure 4.3-2a is conducted, CDFW recommends inclusion of language defining the Project’s obligation to obtain CESA-listed fish take coverage through an ITP issued by CDFW that would allow for Project-related impacts due to the exceedance.

CDFW recommends Mitigation Measure 4.3-2b: Conduct in-Water Construction Activities Between June 1 and October 1 and Only During Daylight Hours be revised to incorporate the restricted in-water work window of August 1 to November 30 to fully avoid impacts to Delta smelt, Chinook salmon, steelhead, and green sturgeon. In the event Project logistics require work outside the recommended in-water work window, or during non-daylight hours, CDFW recommends inclusion of language defining the Project’s obligation to obtain CESA-listed fish take coverage through an ITP issued by CDFW that would allow for Project-related work to occur outside the restricted work window.

CDFW recommends Mitigation Measure 4.3-2d: Avoid or Minimize Temporary Construction Lighting and Permanent Bridge Lighting from Directing Radiating on Water Surfaces of the Sacramento River be revised to incorporate inclusion of language defining the Project’s obligation to implement light-pollution prevention measures for temporary lighting, or obtain CESA-listed fish take coverage through an ITP issued by CDFW in the event that Project logistics require deviation from the ‘daylight only’ daily work period. CDFW also recommends the Project Proponent incorporate lighting design elements for the overwater permanent structures that would minimize impacts to fish and wildlife, such as shielded light designs, dimming controls that allow for programmed switch-off of lights during times of night when use is low, use of ground-level lighting in place of typical overhead lighting, and use of amber and red-spectrum lighting in place of white and blue-spectrum light that has been shown to affect fish migration patterns and make migrating smolts more susceptible to predators.

CDFW recommends Mitigation Measure 4.3-2f Compensate for Impacts on Critical Habitat be revised to require compensatory mitigation for impacts to special-status fish species at a minimum of a 3:1 mitigation ratio (conserved habitat to impacted habitat) for permanent impacts from Project activities to mitigate impacts to less-than-significant. CDFW also recommends identifying either the specific CDFW-approved mitigation bank that credits will be purchased from or outline an additional enforceable mitigation strategy in the event appropriate credits are not available for purchase.

CDFW recommends Mitigation Measure 4.3-2h Prepare and Implement a Fish Rescue and Relocation Plan be revised to include language defining the Project’s obligation to obtain CESA-
listed fish take coverage through an ITP issued by CDFW that would allow the fish rescue and relocation activities proposed without violating Fish and Game Code, § 2080 et seq.

**Comment 6: Mitigation Measure 4.3-3 revisions needed to mitigate impacts to western pond turtle to less-than-significant**

Mitigation Measure 4.3-3 does not include defined survey protocols for detecting western pond turtle (*Emys marmorata*) adults or nests within habitat in the Project area. The northern subpopulation of western pond turtles that persists from the San Francisco Bay Area through the Sacramento Valley has a very broad nesting period (typically April through August) with overwintering of some nests and emergence in March or April. Nests can be established up to 400 meters from the nearest watercourse in sandy substrate with upland grassland characteristics. Without a CDFW-approved survey protocol and a description of the habitat within the Project area being surveyed, CDFW is unable to evaluate if impacts to western pond turtle are fully avoided.

To correct this, CDFW recommends Mitigation Measure 4.3-3 be revised to include adherence to the U.S. Geological Survey (USGS) Draft USGS Western Pond Turtle Visual Survey Protocol for the Southcoast Ecoregion (2006) to identify potential nesting habitat throughout the Project area, or prior to each subsequent project. CDFW also recommends the measure be revised to require compensatory mitigation for impacts to western pond turtle nesting habitat at a minimum of a 3:1 mitigation ratio (conserved habitat to impacted habitat) for permanent impacts and a 1:1 ratio for temporary impacts. Temporary impacts should be defined as impacts that will take less than a year from initial impact to date of habitat recovery back to baseline conditions.

Additionally, CDFW recommends the draft EIR be revised to include the following western pond turtle nesting avoidance measure:

> "Western Pond Turtle Exclusion and Avoidance - To avoid western pond turtle (WPT) nest destruction, exclusion fencing shall be installed around each phase of the Project area and staging areas where Project activity will occur prior to the beginning of the April 1 Western pond turtle nesting season and start of construction for each phase of the Project. Installation of exclusion fencing shall be directed by the qualified biologist. Exclusion fencing shall be partially buried by at least six inches below grade and must be maintained for the duration of the Project (even when a project is dormant). If an active turtle nest containing either hatchlings or eggs is found, CDFW shall be consulted to determine and implement the appropriate avoidance measures. This may include a "no disturbance" buffer around the nest site until the hatchlings have moved to a nearby aquatic site."

**Comment 7: Mitigation Measure 4.3-4 revisions needed to fully avoid impacts to white-tailed kite**

Proposed activities described may impact white-tailed kite (*Elanus leucurus*). The white-tailed kite is a Fully Protected species under State law and may not be taken or possessed at any time.

To correct this, CDFW recommends the draft EIR be revised to include an analysis of the Project's potential impacts to the Fully Protected species, including raptor surveys prior to the start of tree removal activities and during the breeding and nesting seasons when detection is
most likely to identify White-tailed kite nests and roosts. If impacts are identified, CDFW recommends the measure be revised to adhere to Fish and Game code to fully avoid impacts to the species and to require immediate notification to CDFW if the species is detected during Project activities.

Comment 8: Mitigation Measure 4.3-4 revisions needed to mitigate impacts to burrowing owls to a level of less-than-significant
Mitigation Measure 4.3-4 does not include survey protocol to detect burrowing owls (Athena cunicularia) within the Project area. The measure does not define avoidance measures in the event burrowing owls are discovered or reduce impacts from permanent loss of burrowing owl nesting or foraging habitats to a level of less-than-significant as it does not offset those impacts with compensatory mitigation requirements. Burrowing owls are known to utilize urban infrastructure for nesting habitat, such as utility conduits and graded subdivision lots that have laid dormant. Without the Project inclusion of the mitigation measure identified above that addresses potential phasing impacts, as described in Comment 2 of this letter, and inclusion of enforceable avoidance, minimization and mitigation measures defined in the draft EIR in the event burrowing owls are detected the draft EIR does not ensure that impacts have been mitigated to a level of less-than-significant.

To correct this, CDFW recommends Mitigation Measure 4.3-4 be revised to include adherence to the mitigation strategies and survey guidelines defined in the CDFW Staff Report on Burrowing Owl Mitigation (2012). CDFW also recommends Mitigation Measure 4.3-4 be revised to require compensatory mitigation for impacts to burrowing owl foraging habitat at a minimum of a 3:1 mitigation ratio (conserved habitat to impacted habitat) for permanent impacts and a 1:1 ratio for temporary impacts.

Comment 9: Mitigation Measure 4.3-4 revisions needed to avoid impacts to nesting birds
Mitigation Measure 4.3-4 as defined in the draft EIR does not avoid potential impacts to nesting birds because the time period allowed between nesting surveys and the start of Project construction is too long and new nests could become established in previously surveyed areas. Additionally, the described nesting survey window of February 1 to August 31 does not consider shifting patterns of seasonal nesting periods within the Sacramento Valley due to late spring rains and climate change.

To correct these deficiencies, CDFW recommends the measure be revised to include updated language that incorporates the following nesting bird assessment and avoidance language:

"If equipment staging, site preparation, grading, excavation or other Project-related activities are scheduled during the nesting season (February 15 through September 15) of protected raptors and other avian species, focused surveys for active nests of such birds shall be conducted by a Qualified Biologist within 5 days prior to the beginning of Project-related activities. Surveys shall be conducted throughout the Project site, in staging, storage and soil stockpile areas, and along transportation routes. The minimum survey radii surrounding the work area shall be the following: i) 250 feet for passerines; ii) 500 feet for small raptors such as accipiters; iii) 1,000 feet for larger raptors such as buteos. Surveys shall be conducted at the appropriate times of day, and during appropriate nesting times and shall..."
concentrate on areas of suitable habitat. If a lapse in Project-related activities of 14 days or longer occurs, another focused survey, and if required, consultation with CDFW will be required before Project activities can be reinitiated.

If nesting birds are found, then no work shall be initiated until nest-specific buffers have been established with written approval from CDFW. The buffer area(s) shall be fenced off from work activities and avoided until the young have fledged, as determined by the Qualified Biologist. Active nests within or adjacent to the Project site shall be monitored by the Qualified Biologist daily throughout the duration of Project activities for changes in bird behavior or signs of distress related to Project activities. If nesting birds are showing signs of distress or disruptions to nesting behaviors, then nest shall have the buffer immediately increased by the Qualified Biologist until no further interruptions to breeding behavior are detectable.”

Comment 10: Mitigation Measure 4.3-6 revisions needed to mitigate impacts to bats to a level of less-than-significant

Mitigation Measure 4.3-6 identifies potentially significant impacts to bat species that could occur within Project elements, including western red bat (Lasiurus blossevillii), pallid bat (Antrozous pallidus), Mexican free-tailed bat (Tadarida brasiliensis), and big brown bat (Eptesicus fuscus). The measure requires surveys by a qualified bat biologist to determine if bats are utilizing habitat elements prior to Project activities, and development of a mitigation plan in consultation with CDFW if bat roosts are found. However, the measure does not define avoidance and minimization measures beyond this or identify compensatory mitigation in the event impacts to special-status bats cannot be fully avoided if discovered. Western red bat and pallid bat are designated as California Species of Special Concern (SSC), and thus warrant proactive conservation to ensure the populations’ persistence, in addition to the bats of the Sacramento Valley having regionally significant value. As the Project’s potential impacts include possible roost tree removal and Project-related disturbance, such habitat elements found to be in use by bats warrant reduction of impacts to a level of less-than-significant within the draft EIR.

To correct this, CDFW recommends the measure be revised to include a statement defining compensatory mitigation in the event impacts to special-status bats or their habitat are not fully avoidable. CDFW recommends the measure be revised to require compensatory mitigation for impacts to special-status bat habitat at a minimum of a 3:1 mitigation ratio (conserved habitat to impacted habitat) for permanent impacts. CDFW also recommends incorporation of requiring a two-step tree removal method for trees identified by the qualified bat biologist as having bat roost elements, and tree removal conducted under the supervision of the qualified bat biologist. When impacts to bat roots within other elements, such as construction activities within tunnels, are unavoidable, CDFW recommends revising the measure to require consultation with the qualified bat biologist to develop appropriate avoidance and minimization measures. CDFW also recommends incorporation of man-made bat roost elements in the bike and pedestrian foot bridge design and other building and infrastructure designs within the Project area developed with consultation of the qualified bat biologist and CDFW, and consideration given to bat-preferred tree varieties when developing the vegetation and landscape plans for the Project area.
ENVIROMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database, which may be used to make subsequent or supplemental environmental determinations (Pub. Resources Code, § 21003, subd. (e)). Accordingly, please report any special-status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDB). The CNDDB field survey form can be found at the following link: https://www.wildlife.ca.gov/Data/CNDDDB/Submitting-Data#44524420-pdf-field-survey-form. The completed form can be mailed electronically to CNDDB at the following email address: cnndb@wildlife.ca.gov. The types of information reported to CNDDB can be found at the following link: https://www.wildlife.ca.gov/Data/CNDDDB/Plants-and-Animals.

CONCLUSION

CDFW appreciates the opportunity to comment on the draft EIR to assist the City in identifying and mitigating Project impacts on biological resources.

Please note that the proposed Project area lies within both CDFW’s Bay Delta and North Central Regions, and notifications and other permits regarding Project activities will need to be provided to the appropriate region based on the specific location of Project elements. Project elements that lie west of Interstate 5 and south of the I Street Bridge fall within the Bay Delta Region, whereas Project elements east of Interstate 5 and north of the I Street Bridge fall within the North Central Region.

Questions regarding this letter or further coordination should be directed to Ms. Jeanette Griffin, Environmental Scientist, at (209) 234-3447 or Jeanette.Griffin@wildlife.ca.gov; Mr. Dylan Wood, Environmental Scientist, at (916) 358-2384 or Dylan.A.Wood@wildlife.ca.gov; or Ms. Melissa Farinha, Senior Environmental Scientist (Supervisory), at (707) 944-5579.

Sincerely,

Gregg Erickson
Regional Manager
Bay Delta Region

Attachment

cc: Chris Mundhenk, Ascent Environmental, Inc. – Chris.Mundhenk@ascentenvironmental.com
Mitigation Monitoring and Reporting Program for California Department of Fish and Wildlife's Recommended Mitigation Measures Under the California Environmental Quality Act: Draft Environmental Impact Report for the West Broadway Specific Plan/Project

STATE CLEARINGHOUSE NO.: 2018072032

PROJECT PROponent: City of Sacramento

PROJECT: West Broadway Specific Plan
<table>
<thead>
<tr>
<th>Mitigation Measure</th>
<th>Implementation Schedule</th>
<th>Responsible Party</th>
<th>Monitoring/Enforcement</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 Special-Status Plant Assessment and Avoidance: A qualified botanist shall conduct surveys for each special-status plant species with potential to occur within the Project site in accordance with the most current version of CDFW's Protocols for Surveying and Evaluating Impacts to Special-Status Native Plant Populations and Natural Communities.</td>
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<td>2 Special-Status Plant Compensatory Mitigation and Take Authorization: If not fully avoidable by Project activities, impacts to special-status plant species shall be mitigated at a minimum of a 3:1 mitigation ratio (conserved habitat to impacted habitat) for permanent impacts. If take of Rare, Threatened, or Endangered plants is unavoidable, an Incidental Take Permit (ITP) shall be obtained.</td>
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<td>3 Barotrauma Avoidance: Underwater hydroacoustic monitoring shall be conducted during aquatic Project activities and shall not exceed the accumulated sound exposure level (SEL) threshold of 183-decibels (dB) at 10 meters and single-strike peak SEL threshold of 206 dB at 10 meters.</td>
<td>During aquatic project activities/Entire project</td>
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<td>4 Barotrauma Exceedance Take Authorization: If the Hydroacoustic Effects Analysis determines Project activities will result in exceedance of the accumulated SEL threshold of 183 dB at 10 meters and single-strike peak SEL threshold of 206 dB at 10 meters, an ITP authorizing take of CESA-listed fish shall be obtained.</td>
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<td>5 Work Occurring outside In-Water Construction Window Take Authorization: If Project activities occur outside of August 1 to November 30 or during non-daylight hours, an ITP authorizing take of CESA-listed fish shall be obtained.</td>
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<td>6 Special-Status Fish Compensatory Mitigation: If not fully avoidable by project activities, impacts to special-status fish shall be mitigated at a minimum of a 3:1 mitigation ratio (conserved habitat to impacted habitat) for permanent impacts.</td>
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<td>7 Western Pond Turtle Assessment and Avoidance: A qualified biologist shall conduct western pond turtle (WPT) surveys in accordance with the most current version of the U.S. Geological Survey (USGS) Draft Western Pond Turtle Visual Survey Protocol for the Southcoast Ecoregion. If WPT nesting habitat is identified, exclusion fencing shall be installed around each phase of the Project area and staging areas where Project activity will occur prior to the beginning of the western pond turtle nesting season and start of construction for each phase of the Project. Installation of exclusion fencing shall be directed by the qualified biologist. Exclusion fencing shall be partially buried by at least six inches below grade and must be maintained for the duration of the Project. If an active turtle nest containing either hatchlings or eggs is found, CDFW shall be consulted to determine and implement the appropriate avoidance measures. This may include a &quot;no disturbance&quot; buffer around the nest site until the hatchlings have moved to a nearby aquatic site.</td>
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<td>9 Burrowing Owl Assessment and Avoidance: For Project elements that have ground disturbance, a qualified biologist shall conduct surveys for burrowing owls (BUOW) in accordance with the most current version of CDFW's Staff Report on Burrowing Owl Mitigation.</td>
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<td>10 Burrowing Owl Compensatory Mitigation: If BUOW nesting and foraging habitat is identified and not fully avoidable by Project activities, impacts to BUOW habitat shall be mitigated at a minimum of a 3:1 mitigation ratio (conserved habitat to impacted habitat) for permanent impacts and a 1:1 ratio for temporary impacts.</td>
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<td>Nesting Bird Assessment and Avoidance: If equipment staging, site preparation, grading, excavation or other project-related activities are scheduled during the nesting season (February 15 through September 15) of protected raptors and other avian species, focused surveys for active nests of such birds shall be conducted by a qualified avian biologist within 5 days prior to the beginning of Project-related activities. Surveys shall be conducted throughout the Project site, in staging, storage and soil stockpile areas, and along transportation routes. The minimum survey radii surrounding the work area shall be the following: i) 250 feet for passerines; ii) 500 feet for small raptors such as accipiters; iii) 1,000 feet for larger raptors such as buteos. Surveys shall be conducted at the appropriate times of day, and during appropriate nesting times and shall concentrate on areas of suitable habitat. If a lapse in Project-related activities of 14 days or longer occurs, another focused survey, and if required, consultation with CDFW will be required before Project activities can be reinitiated. If nesting birds are found, then no work shall be initiated until nest-specific buffers have been established with written approval from CDFW. The buffer area(s) shall be fenced off from work activities and avoided until the young have fledged, as determined by the qualified avian biologist. Active nests within or adjacent to the Project site shall be monitored by the qualified avian biologist daily throughout the duration of Project activities for changes in bird behavior or signs of distress related to Project activities. If nesting birds are showing signs of distress or disruptions to nesting behaviors, then that nest shall have the buffer immediately increased by the qualified avian biologist until no further interruptions to breeding behavior are detectable.</td>
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</table>
Dear Mr. Bess,

Thank you and your team for your work on the long term West Broadway Specific Plan, and your specific work on the related environmental impact. Our total input document covering both the draft plan and the EIR from some long term home owners living near the overconcentrated, dilapidated, and very problematic public housing projects (and the 75 units low income apartments right next to those) were previously sent to Helen Selph. We assume Helen shared all those combined and interrelated comments with you. We recommend you also read that one longer document with our combined input.

But, below is a summary of the most important input most focused on just the draft EIR. As you likely know this little neighborhood where we live and raise our families contain 751 public housing units representing almost a half of all such SHRA units in the ENTIRE CITY limits! This failed and prejudice past government practice of overconcentration has created major and very costly problems for the public housing tenants, the nearby neighbors, and the taxpayers for MANY decades, and are pertinent to a complete and effective review of such socioeconomic related environmental factors.

We also look forward to reviewing and providing input on the draft finance report when it is released. It is likely that draft financing information will raise further concerns/input on the draft plan and EIR.

Please let us now if you have any further related questions, etc. Thank you, Helen, and your team. Here’s summary of information previously shared with Helen that is most pertinent to the EIR.

This plan and EIR should clearly state the fact that this SPA already contains far too many housing units for those with extremely/very low incomes, and that such over-concentrations are harmful. The plan should state that there will be a substantial reduction in the number of existing extremely low/very low income housing units in this SPA to combat the historically prejudiced overconcentration of such public housing in this tiny Sacramento area; it is no coincidence that it was one of the very limited areas in Sacramento that persons of color could buy/own homes well into the 1950’s. The plan should state that this substantial reduction in the overconcentration of poverty (i.e., extremely and very low income housing) will be accomplished by integrating that substantial portion of that housing in other Sacramento areas with little to none utilizing fair share principles.

Modern research/evidence is clear: (e.g., HUD Evidence Matters – Understanding Neighborhood Effects of Concentrated Poverty:}
Placing too much public housing in one little area results in major problems. Neighborhoods of concentrated poverty isolate their residents from the resources and networks they need to reach their potential and deprive the larger community of the neighborhood’s human capital. Research shows cramming too much PH in any one area – overconcentration - creates communities with serious child neglect, crime, delinquency, unemployment, substance abuse and other mental health disorders, and other major and costly problems that, in turn, further restrict the opportunities of those growing up and living in them. It’s warehousing those in need. The impacts of neighborhood poverty rates on creating these problems increase rapidly if a neighborhood exceeds about 20 percent poverty. It appears but is not clear that this plan will result in far greater than 20 percent of all housing units still being for those facing poverty. The plan should provide an estimate of the overall percentages of the estimated 4,900 units that will be for those with extremely low income, very low income, etc.

Here’s more detail on just one problem mentioned above -crime. Cramming both of Sacramento’s two largest two PH projects into this one little Sacramento area has added substantially to high crime rates in this area for MANY DECADES. The online SACPD crime mapping tool documents the following types of serious crimes in these two PH projects in just the past year. There are about 300 listed, many often, many major, costly, and very harmful crimes:


SACPD and others (e.g., UC Davis Study) report that many crimes go unreported in these two dilapidated and over-concentrated PH projects for fear of retaliation, so these crime counts are conservative. The police can only really mop up/react
to the underlying problem – the overconcentration of poverty/PH in this one little area of Sacramento that has caused a bad environment to live in, and major and costly problems for the surrounding community and taxpayers. SACPD reports that crime in the surrounding neighborhood is also higher. And the costs to SACPD decade after decade to respond and stand in harm’s way to such crimes are very high.

Without this SPA plan providing such information on these present and long-term major and costly problems, the context and purpose of proposed changes made in the plan are not clear and really understood. Therefore, the draft plan is not focused on the best really effective housing and community vis a vis the full range of environment challenges.

In 2016, the State Office of Environmental Health Hazard Assessment (OEHHA) ranked the area contained in the SPA as among the most polluted and negatively impacted by socioeconomic challenges in the entire County and State. OEHHA develops problem indicator scores related to its environmental health hazard risk assessment work. The following are specifics: Impaired Water -97%, Hazardous Waste 94%, Groundwater Threats 93%, Rent Adjusted Income 93%, Unemployment 89%, Poverty 86%, Traffic 83% and Diesel 83%. OEHHA also said other high pollution burden percentile scores can be related to a number of factors including but not limited to the I-5 freeway on the west side of this tract/neighborhood. We did not see anything in the draft EIR about the I-5 freeway pollution, and that placing so much housing - much for the less fortunate with many children with other existing health risks - next to such pollution is unhealthy and costly in the long run. The overconcentration of PH in this area drives OEHHA’s indicators of high poverty and unemployment. This OEHHA work/these findings have previously been shared with the City CDD Office. All these very negative environmental findings should be mentioned in this plan and EIR, and help drive the plan’s conclusions and recommendations for improvements in this SPA.

This draft EIR fails to include/address all/most of the bad socioeconomic environmental health hazard conditions that OEHHA says are extremely bad for those living and growing up in this area. We consulted with a Yale and Stanford educated lawyer very knowledgeable in EIRs. He advises that an effective and complete EIR for this SPA must also include socio-economic considerations:

“In general, the issues you cite are right within CEQA, which requires a close look at any “project” that might have an impact on the environment. Environment has been broadly defined, much to the dismay of developers and, indeed, government agencies trying to do things.”

“There’s some controversy about whether CEQA covers socioeconomic impacts, but there is authority that they’re covered. This is from the CalTrans Handbook: Economic or social effects of a project may be used to determine the
significance of physical changes caused by the project. Although primarily
directed at physical changes, CEQA regulations require that socioeconomic
consequences of the physical change be analyzed. This means evaluating the
impacts on an existing community, on religious practices, and on business
activity brought on by the physical changes directly related to the project. For
additional information regarding social and economic effects, please see Volume

Moreover, the plan should be changed to save as many of these large trees as
possible, even if it means reduced housing densities. “Alder Grove” speaks
proudly of the ample trees in this area of the SPA. Ample green space should also
be maintained. These mature shade trees and open green spaces add
substantially to health benefits, property values, and quality of life for those in
this community. The MV subarea is already crammed in right next to the I-5
Freeway with substantial air and noise pollution. These facts are not mentioned in
the plan and EIR, and should be. The Sacramento Tree Foundation and many
others advise that such mature trees help significantly with such pollution and
noise. They also inform that those living in lower economic areas suffer from far
less mature shade trees in our hot and getting hotter region. While the draft plan
calls for planting new replacement and other trees, again, receiving and enjoying
the many benefits of larger established trees would take many decades.
Therefore, this present drafted proposed plan is unfair and insensitive to major
populations the City is trying to help.

Neighbors have lost trust with the City related to the issue of valuing and saving
as many larger trees as possible. For example, in the last several years a
developer rushed to cut down almost all trees on the parcel of land next to the I-5
freeway that is immediately south of the SPA and just west of the land with the
oldest home in the whole general Land Park area. Noise from and sight of the
endless vehicles on I-5 has increased substantially, decreasing the value of
nearby properties and the health benefits and quality of life for nearby neighbors.
Almost three years later the land is still undeveloped, and left -now- clear-cut.

From: cjchaffee@comcast.net <cjchaffee@comcast.net>
Sent: Thursday, February 6, 2020 2:55 PM
To: 'Helen Selph' <HSelph@cityofsacramento.org>
Cc: 'Ron Bess' <RBess@cityofsacramento.org>
Subject: RE: West Broadway Specific Plan
I am a resident of Upper Land Park writing to express my extreme concerns regarding the Proposed transformation of 244 acres south of Broadway to McClatchy & Vallejo Way: west to river, including Miller Park/Marina and area north of Broadway, south of Highway 50 in my neighborhood.

I am concerned about the proposed tremendous increase to the density of housing, the high traffic that will be diverted directly onto the Broadway corridor, the lack of plans for public elementary, middle, and high schools to support the increased population, and the entire lack of services (grocery stores) in the proposals. Additionally, as a neighborhood it is important to have adequate community and open/park space and none of this information is shared in the current proposal.

Upper Land Park currently has a disproportionate amount of public housing for our neighborhood compared to other neighborhoods in Sacramento. The city needs to LIMIT but IMPROVE the public housing in this development.

The language of the types of Housing proposed to be built needs to be specifically outlined for the community to evaluate.

Proper zoning, compatible with the existing neighborhood needs to be included in the plan. This should include LOW-density residential homes, duplexes and no commercial developments more than 35 high.

Our neighborhood would like to see detailed information on traffic impacts to our neighborhood, with specific information regarding the proposed Broadway Bridge, bike lanes, pedestrian zones, public transit etc....we would like the traffic dispersed onto W & X Street to reduce traffic. Considerations for roundabouts need to be shared along with an analysis of the Safety Issues that may arrive due to the increased housing density as it relates to crime and traffic.

As a long time resident of Upper Land Park and an employee of SCUSD, these are all real concerns and issues that need to be addressed by the City of Sacramento.

Kimberlee Moravick-Cheng
Sent Via E-Mail

February 18, 2020

Ron Bess, Assistant Planner
Community Development Department
300 Richards Boulevard
Sacramento, CA 95811
RBess@cityofsacramento.org

Subject: West Broadway Specific Plan | EIR | 2018072032

Dear Mr. Bess:

The Sacramento Municipal Utility District (SMUD) appreciates the opportunity to provide comments on the Draft Environmental Impact Report (EIR) for the West Broadway Specific Plan (Project, SCH 2018072032). SMUD is the primary energy provider for Sacramento County and the proposed Project area. SMUD’s vision is to empower our customers with solutions and options that increase energy efficiency, protect the environment, reduce global warming, and lower the cost to serve our region. As a Responsible Agency, SMUD aims to ensure that the proposed Project limits the potential for significant environmental effects on SMUD facilities, employees, and customers.

It is our desire that the Project EIR will acknowledge any Project impacts related to the following:

- Overhead and or underground transmission and distribution line easements. Please view the following links on smud.org for more information regarding transmission encroachment:
- Utility line routing
- Easements for infrastructure including the need of 12.5-foot Public Utility Easements (PUE) needed to serve the West Broadway Specific Plan area.
- Relocation impacts to electrical infrastructure
- Electrical load needs/requirements
- Energy Efficiency
- Climate Change
- Cumulative impacts related to the need for increased electrical delivery
SMUD would like to offer the following project specific comments:

- SMUD appreciates the opportunity to have contributed to providing information in this project EIR. The information provided in Appendix H, under the Electrical discussion, states the need for additional infrastructure and facilities as development occurs. SMUD would like to be involved with discussing the above areas of interest as well as discussing any other potential issues. We aim to be partners in the efficient and sustainable delivery of the proposed Project. Please ensure that the information included in this response is conveyed to the Project planners and the appropriate Project proponents.

Environmental leadership is a core value of SMUD and we look forward to collaborating with you on this Project. Again, we appreciate the opportunity to provide input on this EIR. If you have any questions regarding this letter, please contact SMUD’s Environmental Management Specialist, Rob Ferrera, at rob.ferrera@smud.org or 916.732.6676.

Sincerely,

Nicole Goi
Regional & Local Government Affairs
Sacramento Municipal Utility District
6201 S Street, Mail Stop B404
Sacramento, CA 95817
nicole.goi@smud.org

Cc: Rob Ferrera
Central Valley Regional Water Quality Control Board

13 February 2020

Ron Bess
City of Sacramento
300 Richards Boulevard, 3rd Floor
Sacramento, CA 95811

CERTIFIED MAIL
7019 2280 0001 8956 7733

COMMENTS TO REQUEST FOR REVIEW FOR THE DRAFT ENVIRONMENTAL IMPACT REPORT, WEST BROADWAY SPECIFIC PLAN PROJECT, SCH#2018072032, SACRAMENTO COUNTY

Pursuant to the State Clearinghouse's 23 December 2019 request, the Central Valley Regional Water Quality Control Board (Central Valley Water Board) has reviewed the Request for Review for the Draft Environmental Impact Report for the West Broadway Specific Plan Project, located in Sacramento County.

Our agency is delegated with the responsibility of protecting the quality of surface and groundwaters of the state; therefore our comments will address concerns surrounding those issues.

Central Valley Water Board staff recommend including Clean Water Act Section 401 in the 4.3.1 Regulatory Setting in the document.

Project activities within aquatic resources will be subject to a Clean Water Act Section 401 permit and/or a Waste Discharge Requirement. This includes fill, excavation, and dredging for the removal and/or placement of marina structures and bridges.

I. Regulatory Setting

Basin Plan
The Central Valley Water Board is required to formulate and adopt Basin Plans for all areas within the Central Valley region under Section 13240 of the Porter-Cologne Water Quality Control Act. Each Basin Plan must contain water quality objectives to ensure the reasonable protection of beneficial uses, as well as a program of implementation for achieving water quality objectives with the Basin Plans. Federal regulations require each state to adopt water quality standards to protect the public health or welfare, enhance the quality of water and serve the purposes of the Clean Water Act. In California, the beneficial uses, water quality objectives, and the Antidegradation Policy are the State's water quality standards. Water quality standards are also contained in the National Toxics Rule, 40 CFR Section 131.36, and the California Toxics Rule, 40 CFR Section 131.38.

The Basin Plan is subject to modification as necessary, considering applicable laws, policies, technologies, water quality conditions and priorities. The original Basin Plan

KARL E. LONGLEY ScD, P.E., CHAIR | PATRICK PULUPA, ESQ., EXECUTIVE OFFICER

11020 Sun Center Drive #200, Rancho Cordova, CA 95670 | www.waterboards.ca.gov/centralvalley
Plans were adopted in 1975, and have been updated and revised periodically as required, using Basin Plan amendments. Once the Central Valley Water Board has adopted a Basin Plan amendment in noticed public hearings, it must be approved by the State Water Resources Control Board (State Water Board), Office of Administrative Law (OAL) and in some cases, the United States Environmental Protection Agency (USEPA). Basin Plan amendments only become effective after they have been approved by the OAL and in some cases, the USEPA. Every three (3) years, a review of the Basin Plan is completed that assesses the appropriateness of existing standards and evaluates and prioritizes Basin Planning issues. For more information on the *Water Quality Control Plan for the Sacramento and San Joaquin River Basins*, please visit our website:
http://www.waterboards.ca.gov/centralvalley/water_issues/basin_plans/

**Total Maximum Daily Loads (TMDLs) and Impaired Water Bodies**

This portion of the Sacramento River is currently on the Clean Water Act Section 303(d) List of Impaired Waters due to chlordane, chlordrin, diazinon, diethyl, group A pesticides, invasive species, mercury, PCBs (Polychlorinated biphenyls), toxicity. Central Valley Water Board staff recommends referencing the most current 303(d) list and requirements contained in existing TMDLs for the Sacramento-San Joaquin Delta within the draft Environmental Impact Report, discussing any potential short- and long-term effects of these pollutants from project activities or program level impacts, and discussing mitigation measures and/or best management practices to reduce potential effects.

This portion of the Sacramento River is identified on the Clean Water Act Section 303(d) List as impaired by mercury because of elevated methylmercury concentrations in fish that pose a risk to wildlife and humans who consume fish. Due to historical mercury and/or gold mining in the watershed, the project boundary likely has deposits of mercury-containing sediments. As project construction is occurring, Central Valley Water Board staff recommends project proponents implement practices to control erosion and minimize discharges of mercury and methylmercury. For instance, Central Valley Water Board staff recommends the implementation of turbidity curtains and/or cofferdams for in-water work to limit the discharge of suspended solids downstream, which will reduce the risk of methylation of mercury downstream that are attached to those suspended solids. The goal is to minimize erosion of the mercury-containing soils in order to protect beneficial uses in this portion of the Sacramento River and to reduce mercury and methylmercury loads moving downstream.

Dredging activities and activities that reuse dredge material should minimize increases in methyl and total mercury discharges to Delta waterways. If the project will involve dredging activities, Central Valley Water Board staff recommends employing management practices during and after dredging activities to minimize sediment releases into the water column. Further, ensure that under normal operational circumstances, including during wet weather, dredged and excavated material is protected from erosion into open waters.
If dredge material disposal sites are utilized to settle out solids and return waters are discharged into the adjacent surface water, methylmercury concentrations in return flows should be equal to or less than concentrations in the receiving water. Considerations such as vegetation management and return water residence time may minimize the methylmercury concentration in the return water flows. Helpful information on this subject may be found in a report produced by the United States Army Corp of Engineers, entitled Methylmercury Summary Report, Sacramento and Stockton Deep Water Ship Channels, Operation and Maintenance Dredging, May 2019.

If dredge material is reused at aquatic locations, the reuse should not add mercury-enriched sediment to the site or result in a net increase of methylmercury discharges from the reuse site.

The use of vibratory pile driving may increase turbidity within the waterbody that contains mercury. Central Valley Water Board staff recommends discussing best management practices and/or avoidance and minimization measures such as dewatering, implementing turbidity curtains, or use of cofferdams to reduce the potential of creating suspended solids from pile driving.

**Antidegradation Considerations**

All wastewater discharges must comply with the Antidegradation Policy (State Water Board Resolution 68-16) and the Antidegradation Implementation Policy contained in the Basin Plan. The Antidegradation Implementation Policy is available on page 74 at:

https://www.waterboards.ca.gov/centralvalley/water_issues/basin_plans/sacsjr_2018_05.pdf

In part it states:

*Any discharge of waste to high quality waters must apply best practicable treatment or control not only to prevent a condition of pollution or nuisance from occurring, but also to maintain the highest water quality possible consistent with the maximum benefit to the people of the State.*

*This information must be presented as an analysis of the impacts and potential impacts of the discharge on water quality, as measured by background concentrations and applicable water quality objectives.*

The antidegradation analysis is a mandatory element in the National Pollutant Discharge Elimination System and land discharge Waste Discharge Requirements (WDRs) permitting processes. The environmental review document should evaluate potential impacts to both surface and groundwater quality.

**II. Permitting Requirements**

**Construction Storm Water General Permit**

Dischargers whose project disturb one or more acres of soil or where projects disturb less than one acre but are part of a larger common plan of development that in total disturbs one or more acres, are required to obtain coverage under the General Permit for Storm Water Discharges Associated with Construction Activities.
(Construction General Permit), Construction General Permit Order No. 2009-009-DWQ. Construction activity subject to this permit includes clearing, grading, grubbing, disturbances to the ground, such as stockpiling, or excavation, but does not include regular maintenance activities performed to restore the original line, grade, or capacity of the facility. The Construction General Permit requires the development and implementation of a Storm Water Pollution Prevention Plan (SWPPP). For more information on the Construction General Permit, visit the State Water Resources Control Board website at: http://www.waterboards.ca.gov/water_issues/programs/stormwater/constpermits.shtml

Phase I and II Municipal Separate Storm Sewer System (MS4) Permits
The Phase I and II MS4 permits require the Permittees reduce pollutants and runoff flows from new development and redevelopment using Best Management Practices (BMPs) to the maximum extent practicable (MEP). MS4 Permittees have their own development standards, also known as Low Impact Development (LID)/post-construction standards that include a hydromodification component. The MS4 permits also require specific design concepts for LID/post-construction BMPs in the early stages of a project during the entitlement and CEQA process and the development plan review process.

For more information on which Phase I MS4 Permit this project applies to, visit the Central Valley Water Board website at: http://www.waterboards.ca.gov/centralvalley/water_issues/storm_water/municipal_permits/

For more information on the Phase II MS4 permit and who it applies to, visit the State Water Resources Control Board at: http://www.waterboards.ca.gov/water_issues/programs/stormwater/phase_ii_municipal.shtml

Clean Water Act Section 404 Permit
If the project will involve the discharge of dredged or fill material in navigable waters or wetlands, a permit pursuant to Section 404 of the Clean Water Act may be needed from the United States Army Corps of Engineers (USACE). If a Section 404 permit is required by the USACE, the Central Valley Water Board will review the permit application to ensure that discharge will not violate water quality standards. If the project requires surface water drainage realignment, the applicant is advised to contact the Department of Fish and Game for information on Streambed Alteration Permit requirements. If you have any questions regarding the Clean Water Act Section 404 permits, please contact the Regulatory Division of the Sacramento District of USACE at (916) 557-5250.

1 Municipal Permits = The Phase I Municipal Separate Storm Water System (MS4) Permit covers medium sized Municipalities (serving between 100,000 and 250,000 people) and large sized municipalities (serving over 250,000 people). The Phase II MS4 provides coverage for small municipalities, including non-traditional Small MS4s, which include military bases, public campuses, prisons and hospitals.
Clean Water Act Section 401 Permit – Water Quality Certification
If an USACE permit (e.g., Non-Reporting Nationwide Permit, Nationwide Permit, Letter of Permission, Individual Permit, Regional General Permit, Programmatic General Permit), or any other federal permit (e.g., Section 10 of the Rivers and Harbors Act or Section 9 from the United States Coast Guard), is required for this project due to the disturbance of waters of the United States (such as streams and wetlands), then a Water Quality Certification must be obtained from the Central Valley Water Board prior to initiation of project activities. There are no waivers for 401 Water Quality Certifications. For more information on the Water Quality Certification, visit the Central Valley Water Board website at: https://www.waterboards.ca.gov/centralvalley/water_issues/water_quality_certification/

Waste Discharge Requirements – Discharges to Waters of the State
If USACE determines that only non-jurisdictional waters of the State (i.e., “non-federal” waters of the State) are present in the proposed project area, the proposed project may require a Waste Discharge Requirement (WDR) permit to be issued by Central Valley Water Board. Under the California Porter-Cologne Water Quality Control Act, discharges to all waters of the State, including all wetlands and other waters of the State including, but not limited to, isolated wetlands, are subject to State regulation. For more information on the Waste Discharges to Surface Water NPDES Program and WDR processes, visit the Central Valley Water Board website at: https://www.waterboards.ca.gov/centralvalley/water_issues/waste_to_surface_water/

Projects involving excavation or fill activities impacting less than 0.2 acre or 400 linear feet of non-jurisdictional waters of the state and projects involving dredging activities impacting less than 50 cubic yards of non-jurisdictional waters of the state may be eligible for coverage under the State Water Resources Control Board Water Quality Order No. 2004-0004-DWQ (General Order 2004-0004). For more information on the General Order 2004-0004, visit the State Water Resources Control Board website at: https://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2004/wqo/wqo2004-0004.pdf

Dewatering Permit
If the proposed project includes construction or groundwater dewatering to be discharged to land, the proponent may apply for coverage under State Water Board General Water Quality Order (Low Risk General Order) 2003-0003 or the Central Valley Water Board’s Waiver of Report of Waste Discharge and Waste Discharge Requirements (Low Risk Waiver) R5-2013-0145. Small temporary construction dewatering projects are projects that discharge groundwater to land from excavation activities or dewatering of underground utility vaults. Dischargers seeking coverage under the General Order or Waiver must file a Notice of Intent with the Central Valley Water Board prior to beginning discharge.

For more information regarding the Low Risk General Order and the application process, visit the Central Valley Water Board website at:

For more information regarding the Low Risk Waiver and the application process, visit the Central Valley Water Board website at:

**Limited Threat General NPDES Permit**

If the proposed project includes construction dewatering and it is necessary to discharge the groundwater to waters of the United States, the proposed project will require coverage under a National Pollutant Discharge Elimination System (NPDES) permit. Dewatering discharges are typically considered a low or limited threat to water quality and may be covered under the General Order for *Limited Threat Discharges to Surface Water* (Limited Threat General Order). A complete Notice of Intent must be submitted to the Central Valley Water Board to obtain coverage under the Limited Threat General Order. For more information regarding the Limited Threat General Order and the application process, visit the Central Valley Water Board website at:

**NPDES Permit**

If the proposed project discharges waste that could affect the quality of surface waters of the State, other than into a community sewer system, the proposed project will require coverage under a National Pollutant Discharge Elimination System (NPDES) permit. A complete Report of Waste Discharge must be submitted with the Central Valley Water Board to obtain a NPDES Permit. For more information regarding the NPDES Permit and the application process, visit the Central Valley Water Board website at: https://www.waterboards.ca.gov/centralvalley/help/permit/

If you have questions regarding these comments, please contact me at (916) 464-4812 or Jordan.Hensley@waterboards.ca.gov.

[Signature]

Jordan Hensley
Environmental Scientist

cc: State Clearinghouse unit, Governor's Office of Planning and Research, Sacramento (via email)

Lauren Smitherman
Central Valley Water Board
Lauren.Smitherman@waterboards.ca.gov
UPPER LAND PARK NEIGHBORS ASSN
LAND PARK COMMUNITY ASSN
COMMENTS

on the
CITY OF SACRAMENTO'S
WEST BROADWAY DRAFT SPECIFIC PLAN
and DRAFT ENVIRONMENTAL DOCUMENT (EIR)
(February 18, 2020 final)

HOUSING, LAND USE AND ZONING

In 2015, Land Park Community Association, Upper Land Park Neighbors, Greater Broadway Partnership participated in the development of a Choice Neighborhoods Initiative (CNI) Transformation Plan for the redevelopment of SHRA’s Marina Vista and Alder Grove public housing (72 acres). This CNI Transformation Plan is referenced in the WBSP and some elements are specifically incorporated into this WBSP, while many others are not. For example, there is less density proposed in Marina Vista near existing single family homes, which is appreciated. Also, many of the issues in the WBSP merely identify "goals" and not specific direction for SHRA's parcels, which are approximately 76 acres total. The WBSP should include the specific recommendations on land use and densities identified in the CNI Transformation Plan. The WBSP must provide clearer policy direction for SHRA's future development because its two parcel would have 34% of the total residential housing units in the whole WBSP area. Out of 4,900 total units, SHRA would be able to build up to 1,610 on its two parcels).

WBSP ISSUE: Concentrates more affordable housing to SHRA's existing 751 public housing units at Marina Vista (along 5th St & Vallejo) and Alder Grove (Broadway & Muir Way) -- doubling and tripling number of units on these two large sites.

Upper Land Park currently has approximately 50% of the total City public housing units and the WBSP greatly expands the amount of local affordable housing in the WBSP area. We are not opposed to public housing and do not seek to eliminate it within the planning area boundaries. Presently the Alder Grove and Marina Vista areas contain 360 and 391 units respectively. A third public housing area in Upper Land Park, Land Park Woods, has 75 units so there are now 826 public housing units in Upper Land Park. With the proposed increases to 930 and 680 units, for Alder Grove and Marina Vista, the total count will be 1,610 units, a 104 percent increase. We believe it is unreasonable to increase the public and affordable housing stock by such a large amount. Much of the recent national dialogue on housing is moving in the opposite direction, seeking to disperse, not centralize, public and affordable housing on large parcels.
There is an equity issue at play in the WBSP relating to increasing public and affordable housing. For example, compare the Rail Yards Specific Plan with the WBSP. The approved Rail Yards Mixed-Income Housing Strategy states that if 10,000 residential units are ultimately built, 600, or 6 percent, must be affordable (not necessarily public, but affordable). If 6,000 total residential units are built 500 units must be affordable, or 8.3 percent. In the proposed WBSP it is proposed there will be 1,685 public housing units out of 4,900 total units, or 34 percent on two parcels. Equity requires reducing the share of public and affordable units in Upper Land Park and increasing the share of affordable housing in other parts of the City, including the Rail Yards area.

In addition, the WBSP states a goal that affordable will be encouraged in other areas of the WBSP areas, but allows private developers to pay an "in lieu" housing fee to not build affordable housing units with their projects. The WBSP identifies only the Sacramento Housing and Redevelopment Agency (SHRA) properties with public and affordable housing.

**Recommendations:**

1. Include more details for SHRA's two large parcels. The WBSP should include a more detailed housing strategy and identify the percentage of public, affordable and market-rate housing. In addition, the housing strategy should identify average median incomes (AMI); product types (rental and ownership) and document how SHRA parcels will result in a true mixed use development. Documentation of a range of housing opportunities and economic, racial, and demographic integration is critical. This was required of private developers in the Railyards and should be required for SHRA to ensure future development on SHRA parcels results in a true mixed-use community -- and not merely increase and concentrate low income housing on SHRA's two parcels.

2. Add Plan language that requires SHRA to evaluate city-owned sites outside of the Plan area for relocation of some existing public housing. Consider selling either the Alder Grove or Marina Vista parcels (or portions), require the SHRA land to support a mix of market rate housing types and using the proceeds to purchase and develop a suitable tract elsewhere in Sacramento that will relocate some of the public housing in the West Broadway area. The current WBSP ignores community input from the July 31, 2019 public meeting which requested limiting (not eliminating!) public housing in Upper Land Park. We agreed existing SHRA residents must be protected. However, a residents' survey indicated that 34% of existing residents would consider relocation. Also, SHRA agreed to look at other sites in and outside of the Plan's area in the Choice Neighborhoods Initiative (CNI) Transformation Plan, which also identified 14 sites for potential affordable housing developments. The WBSP says this "may happen" it does not require it and Environmental Impact Report (EIR) states affordable units will be placed on SHRA properties. Other major cities have reduced the concentration of public housing and affordable units to other locations. Seattle moved 100 units out of
one housing development so that it had a more balanced mix of housing and economic diversity.

**WBSP ISSUE: Housing Types and Mix Need to be identified in the Plan and the zoning.**

The WBSP needs to develop more clarity about the mix of housing types on public housing land. This is similar to item 1, above, but about residential zoning, not commercial zoning. The proposed densities for Alder Grove and Marina Vista are 36 and 30 units per net acre, respectively. We agree and understand that generally urban residential density will be increased. However, in the situation where multi-unit will be directly adjacent to existing single-family residential development there should be a transition zone of intermediate density housing. This would support the City Housing Goal H-1.3.5, housing type distribution. This concept was also agreed to by SHRA in the Choice Neighborhoods Initiative Transformation Plan.

**Recommendation:** Add language to Specific Plan that requires specific housing types that are similar in size, character to existing single family homes along McClatchy Way, Merkeley and San Luis Court and lower densities that are compatible with single family.

**WBSP ISSUE: C-2 Zoning adjacent to Existing Single Family homes**

On the proposed zoning map (figure 4-4: Zoning December 2019 EIR) we are concerned about the C-2 zoning in the southeast section of the specific planning area. We note that this “edge” of the planning area directly abuts a single-family residential area. The C-2 zone is along 5th Street, but ends next to Merkeley and McClatchy Ways. We believe that there needs to be a smoother transition to this edge adjacent to the single-family residences. Under the proposed C-2 zoning the density range is 33 to 110 units per acre.

**Recommendation:** Change C-2 zoning to R-3A or less on parcels that front Merkeley Way. The edge near the above streets should be limited to housing stock that is more compatible with the existing adjacent residential neighborhood. Duplexes and small lot single family homes, with residential densities less than 30 net units per acre would be appropriate. Similarly, any surrounding commercial development in this proposed zone should be limited in height to no more than 35 feet.

**WBSP ISSUE: Plan is unclear about housing types on Alder Grove Parcel, which increases units from 360 up to 930.** To obtain the number of units, what building types will be needed, i.e. 6 story multi-unit buildings? What percentage of buildings would be large multi-unit buildings vs. smaller residential units. (The CNI Transformation Plan included owner-occupied single family homes and condos.)
Recommendations: Add more detail to the WBSP and identify building types, percentage on SHRA two parcels. This level of detail should be specified in the plan and zoning changes.

**TRAFFIC CIRCULATION, MOBILITY & TRAFFIC SAFETY**

The WBSP doesn't identify basic traffic analysis data and information from which the public can understand the impacts to the larger Land Park residential areas and its key commercial corridors. We have asked for data to better understand the following and would like the following information made available in the WBSP or its appendices. When reviewing Section 4.12 Transportation and Circulation we have the following comments.

**WBSP ISSUE:** WBSP inputs and assumptions have not been disclosed. It is not possible to evaluate the traffic model results without full disclosure of the following inputs and assumptions:

- Detailed land use quantities and trip generation rates, especially within the WBSP Area but also along Broadway and elsewhere within the Study Area
- Exact locations of various projects included in the “Cumulative” alternatives, especially the proposed Broadway Bridge
- Detailed trip tables showing distribution of trips between zones, especially for zones within the WBSP Area
- Mode share allocations for all four modes: vehicle, transit, pedestrian, and bicycle – both inputs and results after trip generation and assignment
- Travel counts for non-auto modes: transit, pedestrian, bicycle.

**Recommendation:** provide above data to the public in final WBSP appendices

**Recommendation:** The analysis should be focused on the “No Build” and “Build” alternatives – that is, the third and fourth of the “Analysis Scenarios” described on page 4.12-1 of the document that area built on cumulative conditions. It is not useful to analyze the impact of the WBSP on existing conditions (the second alternative listed on page 4.12-1), as that scenario cannot exist in the future.

**Recommendation:** The analysis should present volume to capacity ratios (V/C) as well the various Level of Service (LOS) outcomes. This omission makes it difficult to truly evaluate the impacts of the WBSP.

**Recommendation:** Provide more detail for the public to understand and evaluate the “difference method” forecast. The WBSP seems to imply that model-generated baseline volumes are not consistent with actual counts. Were the adjustments made on a link-by-link basis, on a trip generation basis, or other basis? How did changes in mode share factor into these adjustments?
Recommendation: The sentence in the first paragraph of this section that includes “This cumulative impact analysis does not rely on a list...” [emphasis added] does not make sense, since there is extensive discussion elsewhere of projects that are reflected in the future year analysis, as well as the fact that the SACMET traffic model will include future projects as well. Also see the following two paragraphs on page 41.

Recommendation: As recommended by Caltrans, we believe the WBSP's study area should be increased to, at a minimum, Freeport Blvd on the east, Sutterville Road on the south, and R Street on the north. The designated Study Area (Impact Analysis Area) is too limited to permit analysis and evaluation of the WBSP’s impacts on surrounding areas, including Upper Land Park, Land Park, and the Downtown Core.

WBSP ISSUE: Specific traffic concerns in Section 4.12
First, the WBSP area does not currently meet standards for a Transit Priority Area (TPA), and second, an increase in service in the future necessary for it to qualify as a TPA is not currently funded, and is not feasible within current funding programs and sources.
Recommendation: Redo the analyses to reflect realistic mitigation for public transit ridership

How were trips using the proposed Broadway Bridge over the Sacramento River calculated, and where are the results showing what proportion of cumulative trips are accounted for by the Bridge project?

Recommendation: provide information in Final EIR.

In Table 4.12-7, we note that while total vehicle trips over baseline are expected to increase by exactly 3.00 times (300%), internal trips are forecast to increase by 12.3 times (1,230%). This is very hard to understand, given the relatively small size of the study area and the desire by the city to promote non-auto mobility.

Recommendation: Provide an explanation in Final EIR.

Is there a table analogous to 4.12-7 that compares trips for the Cumulative-Plus-Project scenario? We cannot locate such a table.

Recommendation: Provide table for Cumulative-Plus-Project.

WBSP ISSUES: New 8th St connector street and recommended auto routes through Upper Land Park and Land Park proper.
- Realigns Muir Way to Broadway at 8th Street, creating a new "collector" street to reduce backup traffic created by West Sacramento Bridge.
- Recommends primary north-south collector roadways as major auto routes - 5th Street, Muir Way and Riverside Blvd.
- Suggests "signage" indicating 5th, Muir and Riverside are major roadways.
Because of the increased traffic from more dense development, the new West Sacramento bridge connecting at Broadway's west end, and the reduction in traffic lanes on Broadway ("Complete Streets" Project), most intersections on West Broadway go to "Level of Service" LOS F, resulting in three or more traffic light changes for clearing an intersection. The WBSP ignores the community's input at the July 31, 2019 WBSP Community Workshop. Residents' stated they wanted the WBSP to create...connectivity to the Central City, Miller Regional Park and West Sacramento. (#1, page 10); minimize traffic impacts from new development, including cut-through traffic (#2, page 10); and 3) reduce traffic impacts to neighborhoods (page 1) (Workshop Summary).

Instead, the WBSP reduces traffic on Broadway by re-routing it through our residential neighborhood and creating the first LOS F intersection in the greater Land Park residential area. Realigning Muir Way through Alder Grove to connect at 8th Street, would reduce traffic delays at 8th St (creates a LOS E), even though Broadway intersections are allowed to be at a LOS F. The Muir Way realignment will expedite vehicular traffic from Broadway by establishing a new collector roadway as a major auto route. West Sacramento Bridge traffic and traffic from increased density will be directed onto residential streets in Upper Land Park and Land Park. In fact, the WBSP proposes "signs" to direct traffic south on 5th (from Broadway to Vallejo), Muir Way (Broadway & 8th Street to Vallejo Way) and Riverside (from Broadway) onto our residential areas. Instead of directing increased traffic out of residential areas, the Plan does the exact opposite and creates a LOS F at Vallejo Way and Riverside Blvd and other residential street intersections go to LOS D. Funneling traffic onto Vallejo Way is dangerous because it doesn't physically meet the City's width requirements for a collector street. (At Riverside its width is approximately 23 feet and meets the City definition of a neighborhood street.)

**Recommendations:**
1. Include language in WBSP that encourages West Broadway Bridge traffic to be dispersed onto X Street to reduce traffic delays on Broadway.

2. Do not realign Muir Way to 8th Street. Instead direct Broadway traffic north at 8th Street and onto X Street. W and X Streets were built to handle higher traffic volumes.

3. Reduce housing density levels to help reduce traffic impacts in Upper Land Park and Land Park. (Alternative 3 of the Draft EIR states that reduction in housing would reduce traffic.)

**WBSP ISSUE: The lack of mitigation for the impact to intersection of Vallejo and Riverside.** The increase in traffic throughout each day will increase intersection conflicts and therefore crash risk; and, increased congestion will encourage some drivers to cut through residential streets to reach alternative routes (e.g. Land Park Drive).

ULPN & LPCA Comments
Recommendation: Consider traffic movement restrictions (time of day), or, innovative treatments, including Mini-Roundabout intersections.

WBSP ISSUE: Creates major delays at intersections throughout Specific Plan area that are significant, but unavoidable according to the Plan's Environmental Impact Report (EIR).

According to the WBSP traffic analyses, the worst impact in traffic delays occurs at Vallejo Way and Riverside Blvd, which would go to a LOS F during AM peak commute times: 105 sec delay (AM) and 107 sec delay (PM). (Footnote, Table 4.12-12 AM and PM peak intersection operation, p 4.12-47)

Most other intersection operations vary by location and peak hour. All would operate at LOS D or better in AM peak. The highest delays would occur in PM peak commute times at Broadway/Front (LOS E) 73 sec delay; Broadway/8th (LOS E) 63 sec delay; Vallejo/Riverside (LOS D) 40 sec delay; and X Street/3rd St (LOS F) (MM 4.12-2, EIR)

WBSP ISSUE: The draft EIR (including Appendix G) does not contain any documentation of, or direct reference to technical studies performed to evaluate the affect of the WBSP (project) on traffic crash frequency, severity and rates. Appendix B of the December 2018 CEQA update package on “Transportation Impacts” provides general information & guidance on safety impact analysis & mitigation. Also, Caltrans has commented on the need to perform safety analysis focused on changes to the configuration, traffic conditions, and traffic control strategy employed at intersections. Analytical tools can predict changes in crash-type, frequency, severity and rates based on the direct and well-established relationship among traffic volumes, operating conditions (speed, speed differential, and queuing), and crashes.

Recommendation: A safety performance analysis must be conducted at all affected and new intersections at which an arterial, urban collector, traffic signal, or through operating speeds (on one intersecting street) are above 35 MPH.
<=> Under the principle & goals of any Vision Zero program, any predicted or estimated increase in serious injury & fatal crashes (regardless of travel mode) would be a significant impact
<=> numerous intersection safety strategies can be proposed & evaluated to determine which would mitigate the conditions responsible for increase in risk and crash potential.

Recommendation: A Traffic safety performance analysis (and other studies) must be performed for intersections at which the city has decided to install a traffic signal. The California MUTCD recommends use of the Intersection Control Evaluation framework to predict and compare the safety, mobility, economic, air quality, sustainability, energy, annual operational & maintenance costs, and queuing generated by alternatives in order to INFORM decision-making (and “makers”) and the public.

Recommendation: Develop roundabout alternative and compare versus traffic signal, and present findings for public review & comment
WBSP ISSUE: An increase in Left-Turn and Crossing conflicts can increase the number of severe crashes on Broadway over the life or design period.

Recommendations:
Direct West Broadway Bridge traffic onto X Street as soon as possible. This could be done by eliminating the I-5 to Highway 99 off ramp to 3rd Street to build connector which allows bridge traffic to use X Street and reduce traffic on Broadway. (Caltrans is benefitting from the bridge by removing traffic from Highway 50 freeway.)

Perform and document impacts in consideration of the City’s Vision Zero goal, and State’s Strategic Highway Safety Plan goal. Certain intersections (Riverside at Broadway and at X Street) already have severe crash history. The increase in traffic will produce an increase in severe crashes unless mitigation is included.

WBSP ISSUE: Creates serious delays on US 50 East Bound off ramp at X Street and 5th Street. Currently queues are 1,475 feet; increases queues to 2,675 feet during peak periods. (Off ramp queues, p. 4.12.-48 & 49, EIR). This creates dangerous conditions for traffic traveling on I-5 and going onto W/X Freeway to Highway 50 or 99.

Recommendation: Reduce density to mitigate traffic coming onto Broadway (Alternative 3).

NEIGHBORHOODS & SERVICES

WBSP ISSUE: Community Centers
We believe the WBSP provides inadequate community center space at the two major public housing at Alder Grove and Marina Vista. Currently, for 751 units between the two areas, there is 12,000 square feet of community center space. The unit count for public housing in the WBSP more than doubles, yet the community center space only increases 50 percent, to 18,000 square feet. Plus, the original space allocation of 12,000 square feet for community center space is too small. One of the public inputs from the July 31, 2019 public meeting was to enhance the community center, not scale it back on a relative basis.

Recommendation: Re-evaluate and increase the community center space on SHRA properties. A much larger multi-function community center should be developed, one that serves both SHRA public housing residents and the greater Land Park community. With up to 930 units at Alder Grove, a much larger community space area is needed. A space needs study should be conducted to properly size and build this community:

PARKS AND OPEN SPACE

WBSP ISSUE: The WBSP proposed park acreage and locations are inadequate for proposed density.
The WBSP admits that it doesn't meet the City's park acreage requirements. It lacks 7.2 acres based upon the expected number of people who will reside in the area. This ignores the community input at the July 31, 2019 meeting, which requested parks within walking distance of residential units. The WBSP increases existing residential units from the current 1,113 to 4,900. That’s an enormous 340 percent increase. Yet, the proposed local serving public park increases are minuscule, not at all in keeping with the residential unit increases. For example, Alder Grove, proposed to grow from 360 units to 930 units, only adds 3 acres of public park space. Similarly, Marina Vista, increasing from 391 to 680 units adds only 2.5 park acres. There is some vague Specific Plan language about improving Miller Regional Park, but the Plan does not assure this will be done and as a regional park it does not satisfy the need for close-in local serving parks. In lieu park fees used for park amenities or park acres in other areas of the city is inadequate for the population being proposed in the WBSP area. This will put more strain on Southside Park and William Land Park.

**Recommendation:** The WBSP must add more park acres by creating locally serving public parks in the WBSP area. Any in lieu park fees obtained within the WBSP area should be used in the West Broadway Specific Plan Area.

**HISTORIC AND CULTURAL RESOURCES**

**WBSP ISSUE:** Proposes total demolition of the New Helvetia Historic District (aka Alder Grove) and ignores community input at 7/31/2019 Workshop which said to "Preserve the historic portions of Alder Grove" (page 13, Workshop Summary).

WBSP doesn't adequately articulate the historic importance of the historic brick buildings and district located at Broadway and Muir Way, across from the historic Old City Cemetery. New Helvetia is the site of the first fight against segregation in Sacramento. The WBSP states that SHRA must follow state and federal rules, but then the WBSP states all buildings will be demolished, which does not meet the Secretary of Interior's Preservation Standards. New Helvetia Historic District (most of Alder Grove) is a national and state approved historic district meeting three criteria:

The WBSP references an SHRA "Historic Preservation Strategy Review" report, but doesn't include details about the report in the WBSP. That report states that half of buildings should be retained to preserve an historical district. This should be stated in the WBSP to encourage SHRA to retain the historic buildings and also add housing density by removing some historic buildings and adding more housing in open space and parking lots. Instead, the WBSP recommends demolition of all historic buildings in New Helvetia Historic District. And that possible mitigation for demolition, the WBSP suggests placing "monument" signs throughout the development that discusses Nathaniel Colley's history at this site. (This is same recommendation in the CNI Transformation Plan recommendation, which was rejected at the July 31, 2019 Community Workshop.) The WBSP recommendation to destroy New Helvetia Historic
District with proposed mitigation of monument signs would not meet the Secretary of Interior's Historic Standards. Keep a portion of the historic brick buildings to create more diverse housing types within the area and adjacent to Historic City Cemetery.

**Recommendations:**

1. Add language to the WBSP that recognizes the importance of New Helvetia.
2. Describe the recommendations from the SHRA's Historic Preservation Strategy Review which was to retain a large portion of the historic buildings with upgrades, i.e. 60% of buildings, and add new housing stock.
3. The Specific Plan should state that redevelopment of Alder Grove (aka New Helvetia Historic District) can be achieved -- adding more new housing - and at the same time preserve a large number of the existing historic brick buildings. Preserving a part of the New Helvetia Historic District would create a unique, high density development across from the historic City Cemetery..

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1 New Helvetia Historic District meets three criteria for Secretary of Interior's approval: 1) Important person: Nathaniel Colley, Sr. the first black attorney in Sacramento who received national recognition for promoting fair housing; 2) Important event: site of first challenge to segregation in Sacramento brought about by Nathaniel Colley; and 3) Important Architecture: only development in which Sacramento's top four architects worked together. Only 3% of the nation's approved historic entities meet three criteria. only 5% of the City's 77 nominated listings meet all three criteria.

Revised 2/18/2020 final
February 19, 2020

Mr. Ron Bess
City of Sacramento
Community Development Department
Environmental Planning Services
300 Richards Blvd. 3rd Floor
Sacramento, CA 95811


Dear Mr. Bess:

Upper Land Park Neighbors, a 501 (c) 4 non-profit organization, is committed to working with all residents within Upper Land Park area to improve our community. Several years ago, when the Sacramento Housing and Redevelopment Agency (SHRA) proposed redevelop of Alder Grove and Marina Vista public housing communities, ULPN asked the City to create a plan for SHRA and the whole area to provide more certainty and direction for new development. In addition, we participated in Choice Neighborhoods Initiative (CNI) Planning Grant process initiated by SHRA. The CNI grant developed a CNI Transformation Plan outlining how the SHRA’s 78 acres of public housing could be redeveloped.

We have worked with the City and SHRA to create higher urban densities in order to avoid sprawl and to reduce vehicle miles travelled. We believe the existing commercial/industrial area should transition into a new community, but believe it should be done in a way that benefits all existing and future residents.

Our review of the Draft WBSP and EIR was done in collaboration with the Land Park Community Association. Our comments on the Draft WBSP and EIR are attached. Our review identified concerns the Draft WBSP that need to be addressed in order to accomplish balanced development within the 244-acre plan area. Of major concern are the following issues listed below. (More detailed comments are in the attached comments)

1. Several community requests from the July 31, 2010 WBSP Community Workshop have not been addressed in the WBSP. Examples include protecting residential streets from traffic impacts. Instead, the WBSP directs increased auto traffic on existing residential streets.

2. The WBSP concentrates affordable housing with the existing 751 public housing units at Alder Grove and Marina Vista. Existing public housing units and new affordable unit would be located on SHRA’s two large parcels. Even though the WBSP states affordable units are expected throughout the WBSP area, private developers have the option of paying an "in lieu housing fee." Thus, there is no certainty that the WBSP will spread affordable units through the area. The WBSP needs to include a detailed mixed-income housing strategy similar to the Railyards Specific Plan. The Rail Yards Specific Plan approved only 600 affordable units with a total of 10,000 housing units. The WBSP proposes
1,610 low-income and affordable out of a total of 4,900 residential units -- 34% of the total build out. We fail to see the principle of equity applied in the West Broadway Specific Plan area.

3. The increased density of 4,900 total residential units creates significant traffic concerns. In addition, the addition of 8,000-11,500 vehicle trips per day from the planned West Sacramento – Broadway Bridge, with design alternatives of two to four vehicle traffic lanes creates level of service (LOS) F at intersections on the west end of Broadway. This WBSP needs to state that the West Sacramento bridge traffic should have two routes: one onto Broadway and then directed north to X Street and, 2) a new road which allows autos to connect to X Street as soon as possible near 3rd Street. Our concern is that the Broadway Bridge will not be a "neighborhood friendly design" as the City adopted.

We hope these comments and questions are seriously considered by the City. We look forward to working with the City to adopt a plan that benefits all existing residents and future residents of Upper Land Park and the whole Land Park community. If you have questions, please feel free to contact me at 916.396.7659 or Luree Stetson at 916.447.3803 or email upperlandparkneighbors@gmail.com

Sincerely,

[Signature]

Joe Livaich, President
UPPER LAND PARK NEIGHBORS (ULPN)

cc:
Steve Hansen, City council member
Helen Selph, Project Manager
ULPN Board members
Land Park Community Association
February 19, 2020

SENT VIA E-MAIL ONLY

Ron Bess, Assistant Planner
City of Sacramento
Community Development Department
300 Richards Blvd.
Sacramento, CA 95811

RE: West Broadway Specific Plan Draft Environmental Impact Report (SAC201801998)

Dear Mr. Bess:

Thank you for providing the opportunity to review the Draft Environmental Impact Report for the West Broadway Specific Plan (WBSP) to the Sacramento Metropolitan Air Quality Management District (Sac Metro Air District). The West Broadway Specific Plan (WBSP) is bounded by the Sacramento River; Broadway; 5th Street/Muir Way; and 4th Avenue. The WBSP will include land use regulations and policies designed to streamline the housing development process and support new development in the WBSP. Sac Metro Air District staff comments on the project follow.

Overall, the plan’s objectives, such as promoting infill residential development and neighborhood-serving uses, and increasing bike and pedestrian travel, will promote a reduction in private vehicle use, thus supporting the improvement of air quality and reduction of greenhouse gas emissions. Our comments below are focused on enhancing the ability of the plan to achieve those goals.

**Mitigation Measure 4.2-2 and the Air Quality Mitigation Plan**

Mitigation Measure 4.2-2 addresses the significant and unavoidable impacts of long-term operational emissions of the WBSP by requiring the implementation of WBSP’s Air Quality Mitigation Plan (AQMP). The AQMP requires that 13% of all new residential units include all-electric appliances and exclude natural gas connections to the units. However, the specific requirement of the AQMP is not stated in Chapter 4.2, Air Quality, nor in the Summary of Impacts and Mitigation Measures table in the Executive Summary. Further, the AQMP is not appended as a formal part of the DEIR. The requirement that is detailed in the AQMP may not be implemented if not included in language that is adopted as part of the FEIR. To enhance compliance with this air quality mitigation measure, we recommend the following:

1. In the section “Mitigation Measure 4.2-2” on page 4.2-21, fourth paragraph, and on page ES-10 in the Executive Summary, in the sentence “Project applicants for individual projects within the Specific Plan Area shall comply with the recommended measures of the WBSP’s AQMP…” (emphasis added), please delete “recommended” or replace with the word “required.”
2. In the next sentence in “Mitigation Measure 4.2-2” on page 4.2-21, fourth paragraph, and in the next sentence on page ES-10 in the Executive Summary, please replace “Section 7.1 of the AQMP includes specific language about how this mitigation measure will be implemented and requirements for compliance with the measure” with “Section 7.1 of the AQMP requires that 13% of all new residential units include all-electric appliances and exclude natural gas connections to the units and includes specific language about how this mitigation measure will be implemented and requirements for compliance with the measure.”

3. Append the AQMP to the FEIR. Please use the correct name of the plan, “Air Quality Mitigation Plan.”

Reference to General Plan
Mitigation Measure 4.2-2 includes the sentence “Additionally, each development proposed as part of WBSP implementation would be required to comply with the policies of the General Plan.” The policies in the City’s General Plan may change over the years during which the WBSP is implemented, and it will be important that future WBSP projects comply with the General Plan that exists at the time. In the section “Mitigation Measure 4.2-2” on page 4.2-21 of Chapter 4, Air Quality, and on page ES-10 in the Executive Summary, modify the sentence that refers to General Plan compliance of future projects proposed in the WBSP to: “Additionally, each development proposed as part of WBSP implementation would be required to comply with the policies of the General Plan in effect at the time of project proposal.”

Section 4.2, Air Quality, Overall
The Sac Metro Air District recommends the following to improve the clarity and technical accuracy of Section 4.2, Air Quality.

1. On page 4.2-4, the first paragraph under the heading “Criteria Air Pollutants” provides a discussion of the Sac Metro Air District’s planning role in maintaining compliance with national air quality standards for ozone. The Sac Metro Air District also develops plans and regulations for compliance with standards for fine particulate matter (PM$_{2.5}$). We recommend that the discussion in this paragraph be expanded to include planning for PM$_{2.5}$. Please refer to our Guide to Air Quality Assessment for more information.

2. On page 4.2-9, under the heading “Particulate Matter,” add wildfires to the list of area sources in the SVAB: “PM$_{10}$ emissions in the SVAB are dominated by emissions from area sources, primarily fugitive dust from vehicle travel on paved and unpaved roads, farming operations, construction and demolition, particles from residential wood combustion, and wildfires.”

3. On page 4.2-10, under the heading “Monitoring Station Data and Attainment Designations,” correct the dates of the air quality data represented in the table: “Table

4. On page 4.2-11, in Table 4.2-4, under the column heading “Ozone,” list only the timeframe to which the data apply. Delete “1-hr” in both the first and second rows of the table:
   a. “Maximum concentration (1-hr/8-hr avg, ppm)”
   b. “Number of days state standard exceeded (1-hr/8-hr).”

5. On page 4.2-11, in Table 4.2-4, under the column heading “Fine Particulate Matter,” the 2018 maximum concentration of 149.9 is nearly three times that of the maximum concentration in 2017, due to emissions from wildfires. It would be helpful to add a footnote indicating the role of wildfires in increasing emissions concentrations in those years. This applies as well to the “Respirable Particulate Matter” section of the table, since the 2017 and 2018 maximum concentrations are three to six times higher than the 2016 maximum concentration. Please add a footnote indicating the role of wildfires in increasing emissions concentrations in those years.

6. On page 4.2-14, under the heading “Impact 4.2-1: Result in Short-Term Construction Emissions of NOx, PM10, and PM2.5,” in the second paragraph, please correct the reference to the table in Chapter 2: “Construction activities were estimated to occur incrementally over time. **Table 2-4 Table 2-2** in Chapter 2 details the projected development…”

7. On page 4.2-14, Table 4.2-5, “Modeled Daily Maximum Construction Emissions of Criteria Air Pollutants and Precursors,” we were unable to verify the values listed in the table with the values in the CalEEMod reports.

8. On page 4.2-16, under the heading “Mitigation Measure 4.2-1b: Reduce Construction-Related Exhaust and Dust Emissions,” beginning of second paragraph, please correct the reference: “Before any grading activities, the project applicant or its designee shall provide a plan for approval by the County City and SMAQMD.”

9. On page 4.2-18, first paragraph, please correct the reference: “Payment into SMUD’s SMAQMD’s mitigation fee program would provide funding…”

10. On page 4.2-21, in the section “Mitigation Measure 4.2-2,” correct the reference: replace “Mitigation Measure 4.2-1 below includes details about the AQMP…” with “Mitigation Measure 4.2-2 below includes details about the AQMP…” Please make the same correction on page ES-10 in the Executive Summary. Add a reference to the Appendix number where the AQMP can be found.

11. On page 4.2-22, in the first paragraph, please replace “…as shown in the AQMP (See Appendix C)” with language indicating the location of the AQMP in the FEIR document, once an appendix location has been established for the AQMP.
Air Quality Mitigation Plan
Please include the appropriate content in Appendix A of the AQMP. Page 3-2 of the AQMP directs the reader to AQMP Appendix A for “details on 2019 Title 24 energy reductions.” However, “Appendix A” of the AQMP is labeled “Appendix A – CalEEMod Modeling Results and Assumptions Tables.” Further, there is no content in Appendix A of the AQMP.

DEIR Appendices
Appendix C of the DEIR contains CalEEMod Annual and Summer reports, but no Winter reports. Please add the Winter emissions summary reports.

Non-CEQA Comments
In response to the Notice of Preparation for the WBSP, the Sac Metro Air District recommended that the EIR include consideration of a project alternative that would reduce population exposure to toxic emissions generated from high-volume roadways Interstate 5 and U.S. Highway 50. Interstate 5 dissects the West Broadway Specific Plan area, and U.S. 50 forms the plan’s boundary in the northwest section. This proximity places many existing and future residences within 1,000 feet of these heavily-travelled roadways. Evidence exists associating short-term and long-term health effects with locating sensitive receptors near major roadways or rail lines. These include an increased exposure to carcinogens such as diesel particulate matter, organic gases, and fine particulate matter. In addition to carcinogens, roadway pollution may include fine particulates with metallic constituents, which are strongly associated with acute respiratory diseases and cardiovascular disease, including death from heart attack.

The City of Sacramento has the authority to consider the impact of toxic air contaminants on public health through its police powers. We recommend that the City consider exposure reduction measures for land developments in the WBSP that could expose people to sources of roadway pollution. The Sac Metro Air District recommends that the WBSP incorporate a vegetative barrier along Interstate 5 and U.S. 50. As individual projects adjacent to these roadways are approved, they would build and maintain the portions of the vegetative barrier included within their boundaries. Design considerations for individual projects would provide additional exposure reduction. To this end, we recommend the WBSP plan include the following measures as conditions of approval for projects proposed within 1,000 feet of Interstate 5 or U.S. Highway 50:

- Plant and maintain a vegetative barrier between the project’s sensitive receptors and the freeway. See the Sac Metro Air District’s Landscaping Guidance for Improving Air Quality near Roadways for information on tree and shrub selection and planting.
- Plant trees to the extent possible throughout the project to maximize tree canopy in all areas.
- Within the project,
  - Locate non-residential uses nearest Interstate 5 or U.S. 50.
  - Locate residences as far away as possible from Interstate 5 or U.S. 50.
For overall guidance on developing land near major roadways, we recommend consulting the Sac Metro Air District’s Mobile Sources Air Toxics Protocol.

Thank you for your consideration of these comments. If you have any questions, please contact me at 916-874-4816 or tduarte@airquality.org.

Sincerely,

Teri Duarte, MPH
Planner/Analyst

Attachment
Cc: Paul Philley, AICP, Sac Metro Air District
Dear Mr. Hansen and Mr. Ron Bee,

I am a resident of Upper Land Park. I oppose the City's proposed development plan to transform 244 acres south of Broadway to McClatchy and Vallejo Way. This community cannot and should not have to support increased public housing units. We do not want to eliminate the current public housing, but rather LIMIT the public housing in our area. Next, you do not address the "type" of different housing you propose. How much is rental vs. ownership? Have you done a study of traffic and its impact on our streets? Also, by doubling and tripling public housing on the 2 parcels (Marina Vista and Alder Grove), you are segregating minorities. You want to keep ALL Minorities in one section of the City. As a minority I am offended.

I ask that you commit to planned studies that include environmental effects, traffic congestion, increased public housing and segregation.

thank you, Susan Sidhu-Manuel
973 Swanston Drive  
Sacramento, CA 95818  
February 20, 2020

City of Sacramento  
Environmental Planning Services

To Whom it May Concern:

We are writing to express disappointment with the documents, “Draft West Broadway Specific Plan” and “Draft Environmental Impact Report for the West Broadway Specific Plan,” prepared for the Community Development Department of the City of Sacramento by Accent Environmental. First, we support and endorse the comments submitted by the Upper Land Park Neighbors Association. In addition, we have a few very specific comments regarding these two documents.

The Land Park neighborhood is an affluent area of Sacramento and from a per capita standpoint, pays a disproportionate share of the property taxes that the city relies on to provide services. We have accepted living with the New Helvetia Projects (Projects) and the crime that the Projects introduce into our neighborhood. We are very concerned however that the plan in the above referenced documents increases residential units from 1,113 up to 4,900. The plan is not specific with regards to the type of units, but one can speculate the vast majority will be low income housing. We can accept an increase in the density of affordable housing, but quadrupling of the density is completely unacceptable.

What is also unacceptable is that there is no analysis presented that other areas of Sacramento were considered. The Land Park neighborhood already has a disproportionate share of the affordable housing in the city, and by quadrupling the density, we will end up with most of the affordable housing. This is insulting that our elected officials, in their overseeing of the Community Development Department and the Sacramento Housing and Redevelopment Agency, would allow this to go forward.

We encourage you to not more than double the density (not more than 2,200 units total) as part of the West Broadway project and to look to other areas of Sacramento and the many parcels controlled by the Sacramento Housing and Redevelopment Agency to place the additional dwelling units. This would spare the Land Park neighborhood with not as drastic of an impact on crime that we are sure to take if the density is increased to 4,900 units.

Besides impacts on crime that are not addressed by the above referenced documents, the documents also fail to account for the impacts on traffic the 10,000 additional people will cause. The documents reference 2,700 additional vehicle trips in the morning commute hours and 3,300 vehicle trips in the late afternoon commute hours. Traffic is already congested in our neighborhood, and will only get worse when the Broadway bridge to West Sacramento is constructed. Increasing by 6,000 total the number of vehicle trips in our neighborhood by your project coupled with what is coming with the bridge in a few years is also unacceptable. By reducing the number of units to not more than doubling the density will make this more
tolerable. Other neighborhoods of Sacramento will be better able to absorb the traffic impacts, especially if constructed near easy access to public transportation.

We also want to briefly discuss the bridge project even though it is being analyzed in a separate analysis. Information that is currently available shows the bridge will discharge traffic onto Broadway. Further, Broadway is likely to be reduced to one lane traffic in each direction. This alone will have significant adverse effects on traffic in the Land Park neighborhood. We encourage you to consider discharging traffic from the West Sacramento bridge onto X Street and not onto Broadway.

We also want to point out that the current dwelling units along Muir Way are historic structures. When anybody else would propose demolishing such structures, strong opposition would be presented by many, including the City of Sacramento. However, when it is a pet project of the City of Sacramento’s bureaucracy, we find it ironic how historic preservation laws and policies are ignored by the City of Sacramento.

The plan as presented has a drastic adverse impact on the quality of life of those of us in the Land Park neighborhood. The impacts on crime and on traffic will be severe and are not accurately analyzed. Further, other alternatives considering other neighborhoods were not considered in the analysis.

We strongly encourage you to take a harder look at the impacts the current proposal will cause on the existing Land Park neighborhood and to look at alternatives that spreads this large increase in the number of dwelling units to other neighborhoods in addition to Land Park. Failure to do so we view as an insult to the Land Park taxpayer base. Thank you for your consideration.

Sincerely,

Dan Tibbitts

Florence Tibbitts

cc. City Council Member Steve Hansen
West Broadway Specific Plan and Draft EIR Comments
SCH 2018072032, 19feb2020
Reviewer: Land Park Community Association

ATTN: Ron Bess, RBess@cityofsacramento.org,
Helen Selph, HSelph@cityofsacramento.org
City of Sacramento, 300 Richards Blvd 95811

The Land Use Committee of the Land Park Community Association supports the concepts underlying the West Broadway Specific Plan. Our support for both the planning and review process is done in collaboration with the Upper Land Park Neighbors Association in an effort to build complete neighborhoods that integrate into healthy communities. This community has long needed an updated vision for this rapidly transforming area. In conjunction with the Broadway Complete Streets project aimed at creating a complete neighborhood commercial corridor, we welcome a new and modernized approach that makes this area a vital part of the City of Sacramento. To this end we have participated in past planning efforts and honor previous plans addressing West Broadway.

Concern #1: Not all previous Plans and Comments have been honored and addressed in the current plan, discounting the effort, contributions, and agreements of the past. Explanations or over-riding considerations should accompany the acknowledgement of all preceding efforts.

Furthermore, we understand the need to create higher urban densities to absorb the inevitable growth as Sacramento is recognized as one of the most “livable” cities in a most desirable state. When well-planned and designed, increased urban density can combat the deleterious effects of urban sprawl – long commutes, significant increases in vehicle miles traveled, increasing vehicular pollution among them. Density can contribute to both sustainability and equity.

Concern #2: An increase in density with the planned 3700 additional dwelling units also creates a decline in community mobility, causing traffic intersections to drop to an unjustified and the lowest level-of-service (LOS-F) in our neighborhood commercial corridors.

In addition, the corresponding drop in mobility is exacerbated by the addition of 8000-11,500 vehicle trips per day from the planned West Sacramento – Broadway Bridge, with design alternatives of two to four vehicle traffic lanes in addition to “neighborhood friendly” multi-model accommodations.

Concern #3: The Broadway Bridge “neighborhood friendly design” should contribute to a reduction of vehicles miles traveled in the City and have no negative impacts on the mobility and air quality of our neighborhoods.

Crash frequency, severity and rates are usually greatest at intersections, and these performance measures are sensitive to increases in the volume and in the number of crossing and left turn conflicts. Crashes numbers and rates are also affected by the intersection configurations and the specific form of intersection traffic control.

Concern #4: A predictive safety performance analysis is required to determine if the WBSP will impact public safety (all travel modes) as referenced in Caltrans letter (dated 2018 ) and in Appendix B of the the CEQA Update package (adopted December 2018). However, documentation of safety impact
analysis findings, calculations, study assumptions etc. does not appear to be included in the Draft EIR, or its Appendices.

Finally, in honor of the City’s General Plan and the Greater Land Park Community Plan, we acknowledge and support the principles of LIVABILITY, SUSTAINABILITY, AND EQUITY. In so doing, we support the strategies adopted by the SHRA Transformation Plan to upgrade and integrate their area public housing throughout the City’s neighborhoods.

**Concern #5:** The Specific Plan acknowledges that nearly 50% of Sacramento’s current public housing exists within the Plan area, yet calls for doubling the density of “affordable housing” to 34% of the proposed buildout. When compared to the Rail Yards Specific Plan, currently approved for an 6% mix of affordable housing, we fail to see the principle of equity applied. Also, reducing low income density would help the plan meet the open and community space standards for this underserved public.

It is with a backdrop of general support that the Land Park Community Association in conjunction with the Upper Land Park Neighbors Association provides the attached questions, comments and observations on the WBSP and Environmental Impact Report as part of the public record... These are meant to be constructive in all manners but also intended to clarify our summary recommendation.

**Summary Recommendation:** (1) Adopt WBSP Alternative #3 to modify density increases in SHRA properties and zones adjacent to existing R-1 designation; and, (2) restrict the West Sacramento Broadway Bridge to two lanes, prioritizing the use of public transportation over vehicle use. Alternative #3 would sufficiently achieve the provision of a variety of housing choices, better the management of the West Broadway corridor as a gateway to the City, and improving the street grid connections within the Specific Plan Area while reducing their negative impact on the surrounding neighborhoods. Therefore, when considering objectives, the WBSP Alternative #3 would best meet the purpose and need for the plan.

**Attachments for the Record:** West Broadway Specific Plan & Draft EIR Review and Comments, Land Park Community Association with the Upper Land Park Neighbors Association 16feb2020.

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WBSP-Draft EIR Review 19Feb20.doc  
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Luree Stetson  
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UPPER LAND PARK NEIGHBORS ASSN  
LAND PARK COMMUNITY ASSN  
COMMENTS  
on the  
CITY OF SACRAMENTO'S  
WEST BROADWAY DRAFT SPECIFIC PLAN  
and DRAFT ENVIRONMENTAL DOCUMENT (EIR)  
(February 18, 2020 final)

HOUSING, LAND USE AND ZONING

In 2015, Land Park Community Association, Upper Land Park Neighbors, Greater Broadway Partnership participated in the development of a Choice Neighborhoods Initiative (CNI) Transformation Plan for the redevelopment of SHRA’s Marina Vista and Alder Grove public housing (72 acres). This CNI Transformation Plan is referenced in the WBSP and some elements are specifically incorporated into this WBSP, while many others are not. For example, there is less density proposed in Marina Vista near existing single family homes, which is appreciated. Also, many of the issues in the WBSP merely identify "goals" and not specific direction for SHRA's parcels, which are approximately 76 acres total. The WBSP should include the specific recommendations on land use and densities identified in the CNI Transformation Plan. The WBSP must provide clearer policy direction for SHRA's future development because its two parcel would have 34% of the total residential housing units in the whole WBSP area. Out of 4,900 total units, SHRA would be able to build up to 1,610 on its two parcels).

WBSP ISSUE: Concentrates more affordable housing to SHRA's existing 751 public housing units at Marina Vista (along 5th St& Vallejo) and Alder Grove (Broadway & Muir Way) -- doubling and tripling number of units on these two large sites.

Upper Land Park currently has approximately 50% of the total City public housing units and the WBSP greatly expands the amount of local affordable housing in the WBSP area. We are not opposed to public housing and do not seek to eliminate it within the planning area boundaries. Presently the Alder Grove and Marina Vista areas contain 360 and 391 units respectively. A third public housing area in Upper Land Park, Land Park Woods, has 75 units so there are now 826 public housing units in Upper Land Park. With the proposed increases to 930 and 680 units, for Alder Grove and Marina Vista, the total count will be 1,610 units, a 104 percent increase. We believe it is unreasonable to increase the public and affordable housing stock by such a large amount. Much of the recent national dialogue on housing is moving in the opposite direction, seeking to disperse, not centralize, public and affordable housing on large parcels.
There is an equity issue at play in the WBSP relating to increasing public and affordable housing. For example, compare the Rail Yards Specific Plan with the WBSP. The approved Rail Yards Mixed-Income Housing Strategy states that if 10,000 residential units are ultimately built, 600, or 6 percent, must be affordable (not necessarily public, but affordable). If 6,000 total residential units are built 500 units must be affordable, or 8.3 percent. In the proposed WBSP it is proposed there will be 1,685 public housing units out of 4,900 total units, or 34 percent on two parcels. Equity requires reducing the share of public and affordable units in Upper Land Park and increasing the share of affordable housing in other parts of the City, including the Rail Yards area.

In addition, the WBSP states a goal that affordable will be encouraged in other areas of the WBSP areas, but allows private developers to pay an "in lieu" housing fee to not build affordable housing units with their projects. The WBSP identifies only the Sacramento Housing and Redevelopment Agency (SHRA) properties with public and affordable housing.

**Recommendations:**

1. Include more details for SHRA’s two large parcels. The WBSP should include a more detailed housing strategy and identify the percentage of public, affordable and market-rate housing. In addition, the housing strategy should identify average median incomes (AMI); product types (rental and ownership) and document how SHRA parcels will result in a true mixed use development. Documentation of a range of housing opportunities and economic, racial, and demographic integration is critical. This was required of private developers in the Railyards and should be required for SHRA to ensure future development on SHRA parcels results in a true mixed-use community -- and not merely increase and concentrate low income housing on SHRA's two parcels.

2. Add Plan language that requires SHRA to evaluate city-owned sites outside of the Plan area for relocation of some existing public housing. Consider selling either the Alder Grove or Marina Vista parcels (or portions), require the SHRA land to support a mix of market rate housing types and using the proceeds to purchase and develop a suitable tract elsewhere in Sacramento that will relocate some of the public housing in the West Broadway area. The current WBSP ignores community input from the July 31, 2019 public meeting which requested limiting (not eliminating!) public housing in Upper Land Park. We agreed existing SHRA residents must be protected. However, a residents’ survey indicated that 34% of existing residents would consider relocation. Also, SHRA agreed to look at other sites in and outside of the Plan's area in the Choice Neighborhoods Initiative (CNI) Transformation Plan, which also identified 14 sites for potential affordable housing developments. The WBSP says this "may happen" it does not require it and Environmental Impact Report (EIR) states affordable units will be placed on SHRA properties. Other major cities have reduced the concentration of public housing and affordable units to other locations. Seattle moved 100 units out of
one housing development so that it had a more balanced mix of housing and economic diversity.

**WBSP ISSUE: Housing Types and Mix Need to be identified in the Plan and the zoning.**

The WBSP needs to develop more clarity about the mix of housing types on public housing land. This is similar to item 1, above, but about residential zoning, not commercial zoning. The proposed densities for Alder Grove and Marina Vista are 36 and 30 units per net acre, respectively. We agree and understand that generally urban residential density will be increased. However, in the situation where multi-unit will be directly adjacent to existing single-family residential development there should be a transition zone of intermediate density housing. This would support the City Housing Goal H-1.3.5, housing type distribution. This concept was also agreed to by SHRA in the Choice Neighborhoods Initiative Transformation Plan.

**Recommendation:** Add language to Specific Plan that requires specific housing types that are similar in size, character to existing single family homes along McClatchy Way, Merkeley and San Luis Court and lower densities that are compatible with single family.

**WBSP ISSUE: C-2 Zoning adjacent to Existing Single Family homes**

On the proposed zoning map (figure 4-4: Zoning December 2019 EIR) we are concerned about the C-2 zoning in the southeast section of the specific planning area. We note that this “edge” of the planning area directly abuts a single-family residential area. The C-2 zone is along 5th Street, but ends next to Merkeley and McClatchy Ways. We believe that there needs to be a smoother transition to this edge adjacent to the single-family residences. Under the proposed C-2 zoning the density range is 33 to 110 units per acre.

Recommendation: Change C-2 zoning to R-3A or less on parcels that front Merkeley Way. The edge near the above streets should be limited to housing stock that is more compatible with the existing adjacent residential neighborhood. Duplexes and small lot single family homes, with residential densities less than 30 net units per acre would be appropriate. Similarly, any surrounding commercial development in this proposed zone should be limited in height to no more than 35 feet.

**WBSP ISSUE: Plan is unclear about housing types on Alder Grove Parcel, which increases units from 360 up to 930.** To obtain the number of units, what building types will be needed, i.e. 6 story multi-unit buildings? What percentage of buildings would be large multi-unit buildings vs. smaller residential units. (The CNI Transformation Plan included owner-occupied single family homes and condos.

**Recommendations:** Add more detail to the WBSP and identify building types, percentage on SHRA two parcels. This level of detail should be specified in the plan and zoning changes.
TRAFFIC CIRCULATION, MOBILITY & TRAFFIC SAFETY

The WBSP doesn't identify basic traffic analysis data and information from which the public can understand the impacts to the larger Land Park residential areas and its key commercial corridors. We have asked for data to better understand the following and would like the following information made available in the WBSP or its appendices. When reviewing Section 4.12 Transportation and Circulation we have the following comments.

WBSP ISSUE: WBSP inputs and assumptions have not been disclosed. It is not possible to evaluate the traffic model results without full disclosure of the following inputs and assumptions:

- Detailed land use quantities and trip generation rates, especially within the WBSP Area but also along Broadway and elsewhere within the Study Area
- Exact locations of various projects included in the “Cumulative” alternatives, especially the proposed Broadway Bridge
- Detailed trip tables showing distribution of trips between zones, especially for zones within the WBSP Area
- Mode share allocations for all four modes: vehicle, transit, pedestrian, and bicycle – both inputs and results after trip generation and assignment
- Travel counts for non-auto modes: transit, pedestrian, bicycle.

Recommendation: provide above data to the public in final WBSP appendices

Recommendation: The analysis should be focused on the “No Build” and “Build” alternatives – that is, the third and fourth of the “Analysis Scenarios” described on page 4.12-1 of the document that area built on cumulative conditions. It is not useful to analyze the impact of the WBSP on existing conditions (the second alternative listed on page 4.12-1), as that scenario cannot exist in the future.

Recommendation: The analysis should present volume to capacity ratios (V/C) as well the various Level of Service (LOS) outcomes. This omission makes it difficult to truly evaluate the impacts of the WBSP.

Recommendation: Provide more detail for the public to understand and evaluate the “difference method” forecast. The WBSP seems to imply that model-generated baseline volumes are not consistent with actual counts. Were the adjustments made on a link-by-link basis, on a trip generation basis, or other basis? How did changes in mode share factor into these adjustments?

Recommendation: The sentence in the first paragraph of this section that includes “This cumulative impact analysis does not rely on a list…” [emphasis added] does not make sense, since there is extensive discussion elsewhere of projects that are reflected
in the future year analysis, as well as the fact that the SACMET traffic model will include future projects as well. Also see the following two paragraphs on page 41.

**Recommendation:** As recommended by Caltrans, we believe the WBSP's study area should be increased to, at a minimum, Freeport Blvd on the east, Sutterville Road on the south, and R Street on the north. The designated Study Area (Impact Analysis Area) is too limited to permit analysis and evaluation of the WBSP’s impacts on surrounding areas, including Upper Land Park, Land Park, and the Downtown Core.

**WBSP ISSUE: Specific traffic concerns in Section 4.12**
First, the WBSP area does not currently meet standards for a Transit Priority Area (TPA), and second, an increase in service in the future necessary for it to qualify as a TPA is not currently funded, and is not feasible within current funding programs and sources.

**Recommendation:** Redo the analyses to reflect realistic mitigation for public transit ridership

How were trips using the proposed Broadway Bridge over the Sacramento River calculated, and where are the results showing what proportion of cumulative trips are accounted for by the Bridge project?

**Recommendation:** provide information in Final EIR.

In Table 4.12-7, we note that while total vehicle trips over baseline are expected to increase by exactly 3.00 times (300%), internal trips are forecast to increase by 12.3 times (1,230%). This is very hard to understand, given the relatively small size of the study area and the desire by the city to promote non-auto mobility.

**Recommendation:** Provide an explanation in Final EIR.

Is there a table analogous to 4.12-7 that compares trips for the Cumulative-Plus-Project scenario? We cannot locate such a table.

**Recommendation:** Provide table for Cumulative-Plus-Project.

**WBSP ISSUES: New 8th St connector street and recommended auto routes through Upper Land Park and Land Park proper.**
- Realigns Muir Way to Broadway at 8th Street, creating a new "collector" street to reduce backup traffic created by West Sacramento Bridge.
- Recommends primary north-south collector roadways as major auto routes - 5th Street, Muir Way and Riverside Blvd.
- Suggests "signage" indicating 5th, Muir and Riverside are major roadways.

Because of the increased traffic from more dense development, the new West Sacramento bridge connecting at Broadway's west end, and the reduction in traffic lanes on Broadway ("Complete Streets" Project), most intersections on West Broadway
go to "Level of Service" LOS F, resulting in three or more traffic light changes for clearing an intersection. The WBSP ignores the community's input at the July 31, 2019 WBSP Community Workshop. Residents' stated they wanted the WBSP to create......connectivity to the Central City, Miller Regional Park and West Sacramento. (#1, page 10); minimize traffic impacts from new development, including cut-through traffic (#2, page 10); and 3) reduce traffic impacts to neighborhoods (page 1) (Workshop Summary).

Instead, the WBSP reduces traffic on Broadway by re-routing it through our residential neighborhood and creating the first LOS F intersection in the greater Land Park residential area. Realigning Muir Way through Alder Grove to connect at 8th Street, would reduce traffic delays at 8th St (creates a LOS E), even though Broadway intersections are allowed to be at a LOS F. The Muir Way realignment will expedite vehicular traffic from Broadway by establishing a new collector roadway as a major auto route. West Sacramento Bridge traffic and traffic from increased density will be directed onto residential streets in Upper Land Park and Land Park. In fact, the WBSP proposes "signs" to direct traffic south on 5th (from Broadway to Vallejo), Muir Way (Broadway & 8th Street to Vallejo Way) and Riverside (from Broadway) onto our residential areas. Instead of directing increased traffic out of residential areas, the Plan does the exact opposite and creates a LOS F at Vallejo Way and Riverside Blvd and other residential street intersections go to LOS D. Funneling traffic onto Vallejo Way is dangerous because it doesn't physically meet the City's width requirements for a collector street. (At Riverside its width is approximately 23 feet and meets the City definition of a neighborhood street.)

Recommendations:
1. Include language in WBSP that encourages West Broadway Bridge traffic to be dispersed onto X Street to reduce traffic delays on Broadway.

2. Do not realign Muir Way to 8th Street. Instead direct Broadway traffic north at 8th Street and onto X Street. W and X Streets were built to handle higher traffic volumes.

3. Reduce housing density levels to help reduce traffic impacts in Upper Land Park and Land Park. (Alternative 3 of the Draft EIR states that reduction in housing would reduce traffic.)

WBSP ISSUE: The lack of mitigation for the impact to intersection of Vallejo and Riverside. The increase in traffic throughout each day will increase intersection conflicts and therefore crash risk; and, increased congestion will encourage some drivers to cut through residential streets to reach alternative routes (e.g. Land Park Drive).

Recommendation: Consider traffic movement restrictions (time of day), or, innovative treatments, including Mini-Roundabout intersections.
WBSP ISSUE: Creates major delays at intersections throughout Specific Plan area that are significant, but unavoidable according to the Plan's Environmental Impact Report (EIR).

According to the WBSP traffic analyses, the worst impact in traffic delays occurs at Vallejo Way and Riverside Blvd, which would go to a LOS F during AM peak commute times: 105 sec delay (AM) and 107 sec delay (PM). (Footnote, Table 4.12-12 AM and PM peak intersection operation, p 4.12-47)

Most other intersection operations vary by location and peak hour. All would operate at LOS D or better in AM peak. The highest delays would occur in PM peak commute times at Broadway/Front (LOS E) 73 sec delay; Broadway/8th (LOS E) 63 sec delay; Vallejo/Riverside (LOS D) 40 sec delay; and X Street/3rd St (LOS F) (MM 4.12-2, EIR)

WBSP ISSUE: The draft EIR (including Appendix G) does not contain any documentation of, or direct reference to technical studies performed to evaluate the affect of the WBSP (project) on traffic crash frequency, severity and rates.

Appendix B of the December 2018 CEQA update package on “Transportation Impacts” provides general information & guidance on safety impact analysis & mitigation. Also, Caltrans has commented on the need to perform safety analysis focused on changes to the configuration, traffic conditions, and traffic control strategy employed at intersections. Analytical tools can predict changes in crash-type, frequency, severity and rates based on the direct and well-established relationship among traffic volumes, operating conditions (speed, speed differential, and queuing), and crashes.

Recommendation: A safety performance analysis must be conducted at all affected and new intersections at which an arterial, urban collector, traffic signal, or through operating speeds (on one intersecting street) are above 35 MPH.

<> Under the principle & goals of any Vision Zero program, any predicted or estimated increase in serious injury & fatal crashes (regardless of travel mode) would be a significant impact

<> numerous intersection safety strategies can be proposed & evaluated to determine which would mitigate the conditions responsible for increase in risk and crash potential.

Recommendation: A Traffic safety performance analysis (and other studies) must be performed for intersections at which the city has decided to install a traffic signal. The California MUTCD recommends use of the Intersection Control Evaluation framework to predict and compare the safety, mobility, economic, air quality, sustainability, energy, annual operational & maintenance costs, and queuing generated by alternatives in order to INFORM decision-making (and “makers”) and the public.

Recommendation: Develop roundabout alternative and compare versus traffic signal, and present findings for public review & comment

WBSP ISSUE: An increase in Left-Turn and Crossing conflicts can increase the number of severe crashes on Broadway over the life or design period.
Recommendations:
Direct West Broadway Bridge traffic onto X Street as soon as possible. This could be done by eliminating the I-5 to Highway 99 off ramp to 3th Street to build connector which allows bridge traffic to use X Street and reduce traffic on Broadway. (Caltrans is benefitting from the bridge by removing traffic from Highway 50 freeway.)

Perform and document impacts in consideration of the City’s Vision Zero goal, and State’s Strategic Highway Safety Plan goal. Certain intersections (Riverside at Broadway and at X Street) already have severe crash history. The increase in traffic will produce an increase in severe crashes unless mitigation is included.

WBSP ISSUE: Creates serious delays on US 50 East Bound off ramp at X Street and 5th Street. Currently queues are 1,475 feet; increases queues to 2,675 feet during peak periods. (Off ramp queues, p. 4.12.-48 & 49, EIR). This creates dangerous conditions for traffic traveling on I-5 and going onto W/X Freeway to Highway 50 or 99.

Recommendation: Reduce density to mitigate traffic coming onto Broadway (Alternative 3).

NEIGHBORHOODS & SERVICES

WBSP ISSUE: Community Centers
We believe the WBSP provides inadequate community center space at the two major public housing at Alder Grove and Marina Vista. Currently, for 751 units between the two areas, there is 12,000 square feet of community center space. The unit count for public housing in the WBSP more than doubles, yet the community center space only increases 50 percent, to 18,000 square feet. Plus, the original space allocation of 12,000 square feet for community center space is too small. One of the public inputs from the July 31, 2019 public meeting was to enhance the community center, not scale it back on a relative basis.

Recommendation: Re-evaluate and increase the community center space on SHRA properties. A much larger multi-function community center should be developed, one that serves both SHRA public housing residents and the greater Land Park community. With up to 930 units at Alder Grove, a much larger community space area is needed. A space needs study should be conducted to properly size and build this community:

PARKS AND OPEN SPACE

WBSP ISSUE: The WBSP proposed park acreage and locations are inadequate for proposed density.

The WBSP admits that it doesn't meet the City’s park acreage requirements. It lacks 7.2 acres based upon the expected number of people who will reside in the area. This
ignores the community input at the July 31, 2019 meeting, which requested parks within walking distance of residential units. The WBSP increases existing residential units from the current 1,113 to 4,900. That's an enormous 340 percent increase. Yet, the proposed local serving public park increases are minuscule, not at all in keeping with the residential unit increases. For example, Alder Grove, proposed to grow from 360 units to 930 units, only adds 3 acres of public park space. Similarly, Marina Vista, increasing from 391 to 680 units adds only 2.5 park acres. There is some vague Specific Plan language about improving Miller Regional Park, but the Plan does not assure this will be done and as a regional park it does not satisfy the need for close-in local serving parks. In lieu park fees used for park amenities or park acres in other areas of the city is inadequate for the population being proposed in the WBSP area. This will put more strain on Southside Park and William Land Park.

**Recommendation:** The WBSP must add more park acres by creating locally serving public parks in the WBSP area. Any in lieu park fees obtained within the WBSP area should be used in the West Broadway Specific Plan Area.

**HISTORIC AND CULTURAL RESOURCES**

**WBSP ISSUE:** Proposes total demolition of the New Helvetia Historic District (aka Alder Grove) and ignores community input at 7/31/2019 Workshop which said to "Preserve the historic portions of Alder Grove" (page 13, Workshop Summary).

WBSP doesn't adequately articulate the historic importance of the historic brick buildings and district located at Broadway and Muir Way, across from the historic Old City Cemetery. New Helvetia is the site of the first fight against segregation in Sacramento. The WBSP states that SHRA must follow state and federal rules, but then the WBSP states all buildings will be demolished, which does not meet the Secretary of Interior's Preservation Standards. New Helvetia Historic District (most of Alder Grove) is a national and state approved historic district meeting three criteria:

The WBSP references an SHRA "Historic Preservation Strategy Review" report, but doesn't include details about the report in the WBSP. That report states that half of buildings should be retained to preserve an historical district. This should be stated in the WBSP to encourage SHRA to retain the historic buildings and also add housing density by removing some historic buildings and adding more housing in open space and parking lots. Instead, the WBSP recommends demolition of all historic buildings in New Helvetia Historic District. And that possible mitigation for demolition, the WBSP suggests placing "monument" signs throughout the development that discusses Nathaniel Colley's history at this site. (This is same recommendation in the CNI Transformation Plan recommendation, which was rejected at the July 31, 2019 Community Workshop.) The WBSP recommendation to destroy New Helvetia Historic District with proposed mitigation of monument signs would not meet the Secretary of
Interior’s Historic Standards. Keep a portion of the historic brick buildings to create more diverse housing types within the area and adjacent to Historic City Cemetery.

**Recommendations:**

1. Add language to the WBSP that recognizes the importance of New Helvetia.
2. Describe the recommendations from the SHRA's Historic Preservation Strategy Review which was to retain a large portion of the historic buildings with upgrades, i.e. 60% of buildings, and add new housing stock.
3. The Specific Plan should state that redevelopment of Alder Grove (aka New Helvetia Historic District) can be achieved -- adding more new housing - and at the same time preserve a large number of the existing historic brick buildings. Preserving a part of the New Helvetia Historic District would create a unique, high density development across from the historic City Cemetery.

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i New Helvetia Historic District meets three criteria for Secretary of Interior's approval: 1) Important person: Nathaniel Colley, Sr. the first black attorney in Sacramento who received national recognition for promoting fair housing; 2) Important event: site of first challenge to segregation in Sacramento brought about by Nathaniel Colley; and 3) Important Architecture: only development in which Sacramento's top four architects worked together. Only 3% of the nation's approved historic entities meet three criteria. only 5% of the City's 77 nominated listings meet all three criteria.

Revised 2/18/2020 final
Please consider the following recommendations in the planning of the West Broadway area to promote a long-term solution rather than a short-sighted, one-term fix to our very real housing issues. Sacramento deserves public housing that is dispersed and thoroughly vetted for outcomes such as traffic and safety. Do not repeat the concentrated models of public housing that have resulted from the many failed projects across our nation and which in the long run do not serve the very people who need it the most.

UPPER LAND PARK NEIGHBORS (ULPN)
PROPOSED COMMENTS
on the City of Sacramento's
DRAFT WEST BROADWAY SPECIFIC PLAN (WBSP)
AND DRAFT ENVIRONMENTAL IMPACT REPORT

WHAT IS CITY PROPOSING?

1. Transforms 244 acres south of Broadway to McClatchy & Vallejo Ways; west to river, including Miller Park/Marina and area north of Broadway, south of Highway 50 into a "cohesive and contemporary neighborhood." This is the same size as the Railyards area being developed north of Downtown. The Plan identifies the long-term vision for redeveloping the West Broadway area, and future studies of transforming the Marina/Miller Regional park.

2. Increases existing residential units in the area from 1,113 to 4,900 dwelling units. (3,787 new residential units).
   - More than doubles the existing 751 public housing units
   - Adds 859 new units for a total of 1,610 units on two SHRA parcels.
   - Approximately 33% of total Plan Area residential units would be on SHRA Marina Vista and Alder Grove parcels.

3. "Encourages" different housing types but doesn't identify percentage of rental vs. ownership units or discuss the balance of communities (level of racial, economic and demographic integration) in new residential areas.

4. Triples existing 1,000 vehicle trips per day in the Specific Plan area.
   - Adding 2,700 vehicle trips during the a.m. peak hour.
   - Adding 3,300 vehicle trips during the p.m. peak hour
WHAT ARE SIGNIFICANT ISSUES?

HOUSING, LAND USE AND ZONING

WBSP ISSUE: Concentrates affordable housing to SHRA's existing 751 public housing at Marina Vista (along 5th Street & Vallejo) and Alder Grove (Broadway and Muir) -- doubling and tripling units on these two sites.

The current WBSP ignores community input from the July 31, 2019 public meeting which requested limiting (not eliminating!) public housing in Upper Land Park. We agree existing SHRA residents must be protected and have improved apartments. Our concern is that there is nothing in the WBSP that ensures that existing public housing units would be relocated for the inclusion of market rate housing, creating true mixed-income housing developments.

Recommendations:
1. The WBSP should include a more detailed housing strategy that identifies the percentage of public, affordable and market-rate housing. In addition, the housing strategy should identify average median incomes (AMI); product types (rental and ownership) and document how SHRA parcels will result in a true mixed use development. Documentation of a range of housing opportunities and economic, racial, and demographic integration is critical. This was required of private developers in the Railyards and should be required for SHRA to ensure future development on SHRA parcels results in a true mixed-use community -- and not merely increase and concentrate low income housing on SHRA's two parcels.

2. Add Plan language that requires SHRA to evaluate relocation of its existing public housing to other available sites outside of the Plan area. Consider selling either the Alder Grove or Marina Vista parcels (or portions), require the SHRA land to support a mix of market rate housing types and using the proceeds to purchase and develop a suitable tract.

WBSP ISSUE: Housing Types and Mix Need to be identified in the Plan and the zoning.

Recommendation: Add language to Specific Plan that requires specific housing types that are similar in size, character to existing single family homes along McClatchy Way, Merkeley and San Luis Court and lower densities that are compatible with single family.

WBSP ISSUE: C-2 Zoning adjacent to Existing Single Family homes

Recommendation: The edge near the above streets should be limited to housing stock that is more compatible with the existing adjacent residential neighborhood. Duplexes and small lot single family homes, with residential
densities less than 30 net units per acre would be appropriate. Similarly, any surrounding commercial development in this proposed zone should be limited in height to no more than 35 feet.

**WBSP ISSUE:** Plan is unclear about housing types on Alder Grove Parcel, which increases units from 360 up to 930.

**Recommendations:** Add more detail to the WBSP and identify building types, percentage on SHRA two parcels. This level of detail should be specified in the plan and zoning changes.

**TRAFFIC CIRCULATION AND MOBILITY**

**WBSP ISSUE:** WBSP inputs and assumptions have not been disclosed. It is not possible to evaluate the traffic model results without full disclosure of the following inputs and assumptions:

- Detailed land use quantities and trip generation rates, especially within the WBSP Area but also along Broadway and elsewhere within the Study Area.

- Exact locations of various projects included in the “Cumulative” alternatives, especially the proposed Broadway Bridge.

- Detailed trip tables showing distribution of trips between zones, especially for zones within the WBSP Area.

- Mode share allocations for all four modes: vehicle, transit, pedestrian, and bicycle – both inputs and results after trip generation and assignment.

- Travel counts for non-auto modes: transit, pedestrian, bicycle.

**Recommendation:** provide above data to the public in final WBSP appendices.

**WBSP ISSUES:** New 8th St connector street and recommended auto routes through Upper Land Park and Land Park proper.

- Realigns Muir Way to Broadway at 8th Street, creating a new "collector" street to reduce backup traffic created by West Sacramento Bridge.
- Recommends primary north-south collector roadways as major auto routes - 5th Street, Muir Way and Riverside Blvd.

- Suggests "signage" indicating 5th, Muir and Riverside are major roadways.

**Recommendations:**
1. Include language in WBSP that encourages West Broadway Bridge traffic to be dispersed onto X Street to reduce traffic delays on Broadway.

2. Do not realign Muir Way to 8th Street. Instead direct Broadway traffic north at 8th Street and onto X Street. W and X Streets were built to handle higher traffic volumes.

3. Reduce housing density levels to help reduce traffic impacts in Upper Land Park and Land Park. (Alternative 3 of the Draft EIR states that reduction in housing would reduce traffic.)

**WBSP ISSUE:** Creates major delays at intersections throughout Specific Plan area that are significant, but unavoidable according to the Plan’s Environmental Impact Report (EIR).

According to the WBSP traffic analyses, the worst impact in traffic delays occurs at Vallejo Way and Riverside Blvd, which would go to a LOS F during both AM and PM peak commute times:

Most other intersection operations vary by location and peak hour. All would operate at LOS D or better in AM peak. The highest delays would occur in PM peak commute times at Broadway/Front (LOS E) 73 sec delay; Broadway/8th (LOS E) 63 sec delay; Vallejo/Riverside (LOS D) 40 sec delay; and X Street/3rd St (LOS F) (MM 4.12-2, EIR)

**WBSP ISSUE:** Creates serious delays on US 50 East Bound off ramp at X Street and 5th Street. Currently queues are 1,475 feet; increases queues to 2,675 feet during peak periods. (Off ramp queues, p. 4.12-48 & 49, EIR). This creates dangerous conditions for traffic traveling south on I-5 and going onto W/X Freeway to Highway 50 or 99.

**Recommendations:**
1. Reduce density to mitigate traffic coming onto Broadway (Alternative 2, page)
2. Direct West Broadway Bridge traffic onto X Street as soon as possible. This could be done by eliminating the I-5 South to Highway 99 off ramp to 5th Street to build connector which allows bridge traffic to use X Street and reduce traffic on Broadway. (Caltrans is benefitting from the bridge by removing traffic from Highway 50 freeway.)
**WBSP ISSUE:** No analysis of roundabouts vs. three new traffic signals along west end of Broadway. The basis of these recommendations is an analysis performed pursuant to California Manual of Uniform Traffic Control Devices Manual traffic signal warrants.

**Recommendation:** Develop roundabout alternative and compare versus traffic signal, and present findings for public review & comment

**WBSP ISSUE:** Conduct and document the Data-Driven Safety Analysis for other intersections within the Specific Plan area and other intersections impacted by the change in traffic volumes — especially left-turn movements toward the City Center, and crossing movements (across Broadway, X and W Streets)? An increase in Left-Turn and Crossing conflicts can increase the number of severe crashes over the life or design period.

**Recommendation:** Perform, document and consider impacts in consideration of the City’s Vision Zero goal, and State’s Strategic Highway Safety Plan goal. Certain intersections (Riverside and Broadway, and many along X Street) already have severe crash history. The increase in traffic will produce an increase in severe crashes unless mitigation is included.

**WBSP ISSUE:** The lack of mitigation for the impact to intersection of Vallejo and Riverside. The increase in traffic throughout each day will increase intersection conflicts and therefore crash risk; and, increased congestion will encourage some drivers to cut through residential streets to reach alternative routes (e.g. Land Park Drive).

**Recommendation:** Consider traffic movement restrictions (time of day), or, innovative treatments, including Mini-Roundabout intersections.

**NEIGHBORHOODS & SERVICES**

**WBSP ISSUE:** The WBSP proposes inadequate community center space at the two major public housing areas, Alder Grove and Marina Vista. Currently, for 751 units between the two areas, there is 12,000 square feet of community center space. The unit count for public housing in the WBSP more than doubles, yet the community center space only increases 50 percent, to 18,000 square feet. Plus, the original space allocation of 12,000 square feet for community center space is too small. One of the public inputs from the July 31, 2019 public meeting was to enhance the community center, not scale it back on a relative basis.

**Recommendation:** Re-evaluate and increase the community center space on SHRA properties. A much larger multi-function community center should be developed, one that serves both SHRA public housing residents and the greater Land Park community. With up to 930 units at Alder Grove, a much larger community space area is needed. A space needs study should be conducted to properly size and build this community:
PARKS AND OPEN SPACE

**WBSP ISSUE:** The WBSP proposed park acreage and locations are inadequate for proposed density.

The WBSP admits that it doesn't meet the City's park acreage requirements. It lacks 7.2 acres based upon the expected number of people who will reside in the area. This ignores the community input at the July 31, 2019 meeting, which requested parks within walking distance of residential units. The WBSP increases existing residential units from the current 1,113 to 4,900. That's an enormous 340 percent increase. Yet, the proposed local serving public park increases are minuscule, not at all in keeping with the residential unit increases.

**Recommendation:** The WBSP must add more park acres by creating locally serving public parks in the WBSP area. Any in lieu park fees obtained within the WBSP area should be used in the West Broadway Area.

URBAN DESIGN & PLACEMAKING

**WBSP ISSUE:** Proposes demolition of the New Helvetia Historic District (aka Alder Grove) and ignores community input at 7/31/2019 Workshop which said to "Preserve the historic portions of Alder Grove" (page 13, Workshop Summary).

The WBSP states that SHRA must follow state and federal rules, but then the WBSP states all buildings will be demolished, which does not meet the Secretary of Interior's Preservation Standards. New Helvetia Historic District (most of Alder Grove) is a national and state approved historic district meeting three criteria: the WBSP recommends demolition of all historic buildings in New Helvetia Historic District. The WBSP suggests placing "monument" signs throughout the development that discusses Nathaniel Colley history of fighting SHRA over its segregation policies in 1952. The WBSP recommendation to destroy New Helvetia Historic District with proposed mitigation of monument signs would not meet the Secretary of Interior's Historic Standards.

**Recommendations:**
1. Add language to the WBSP that recognizes the importance of New Helvetia.
2. Describe the recommendations from the SHRA's Historic Preservation Strategy Review which was to retain a large portion of the historic buildings with upgrades, i.e. 60% of buildings, and add new housing stock.
4. Acknowledge that redevelopment of Alder Grove (aka New Helvetia Historic District) can be achieved -- adding more new housing and renovating existing historic units. to create a unique, historic high density development.
February 20, 2020

Mr. Ron Bess
City of Sacramento
Community Development Department
Environmental Planning Services
300 Richards Blvd. 3rd Floor
Sacramento, CA 95811

(via email and hard copy)

RE: Nathaniel S. Colley, Sr. Civil rights Coalition’s (CCRC) Comments on the City of Sacramento’s Draft West Broadway Specific Plan (WBSP) and Draft Environmental Impact Report (EIR) December 2019

Dear Mr. Bess:

Thank you for the opportunity to comment on the City’s Draft West Broadway Specific Plan (WBSP). Below are comments from the Nathaniel S. Colley, Sr. Civil Rights Coalition (CCRC) is a 501 (c) 3 non-profit organization committed and dedicated to the mission of educating Sacramento residents and others about the legacy and contributions of local African-American attorney Nathanial Colley (1918-1992), his contributions to the civil rights and social justice issues of his day, and his continuing influence on modern-day social and political activism.

The CCRC has participated in the WBSP community meetings and been active in the development of the Alder Grove (aka New Helvetia Historic District.) and has serious concerns about the WBSP’s negative impacts on the New Helvetia Historic District and potential impacts to the current residents living in New Helvetia and Marina Vista housing communities. Our concerns with the Draft WBSP and EIR impacts follow below:

**Housing, Land use and Zoning**

**Level of Density:** The Alder Grove and Marina Vista areas contain 360 and 391 units respectively. With the proposed increases to 930 and 680 units, for Alder Grove and Marina Vista, the total count will be 1,610 units, a 104 percent increase. Increasing public and affordable housing stock by such a large amount on these two sites is opposite of the national housing movement, which is seeking to disperse, not centralize, public and affordable housing on large parcels.
The WBSP allows up to 1,610 public housing units out of 4,900 total units in the WBSP area. It appears that 34 percent of the total housing units in the WBSP will be public housing and located on only two parcels. The WBSP states a goal that affordable will be encouraged in other areas of the WBSP areas but allows private developers to pay an "in lieu" housing fee to not build affordable housing units with their projects. The WBSP identifies only the Sacramento Housing and Redevelopment Agency (SHRA) properties with public and affordable housing. The percentage of public and affordable housing should be reduced in the WBSP plan area and the amount should be increased in the Rail Yards Area, which only requires 6% affordable housing out of a total of 10,000 residential units scattered on seven separate sites.

Include more details for SHRA's two large parcels: The WBSP should include a more detailed housing strategy and identify the percentage of public, affordable and market-rate housing. Documentation of a range of housing opportunities and economic, racial, and demographic integration is critical. The Railyards' Specific Plan required this, and because of the large amount of existing public housing in the Plan area, SHRA should also do this to ensure future development and does not result in an increase and concentration of low-income housing on SHRA's two parcels.

Protecting displaced households: The WBSP does not guarantee protection for existing public housing residents. Regarding the proposals outlined in Policies H-2.1 thru H-2.4, it remains unclear where most of the current public housing residents of Alder Grove or Marina Vista will be residing at total build-out of all Specific Plan development projects. While it is encouraging that Policy H-2.3 suggests the "redevelopment of affordable low-income, workforce, and senior housing in other locations in the Specific Plan Area", no specific sub-areas outside of Alder Grove and Marina Vista have been identified as locations for this housing. Also, since Policy H-2.1 specifies the provision of replacement housing within and outside the Specific Plan area for displaced public housing residents, the City has left a window of uncertainty open to current public housing residents that might lead them to believe that they may be unable to remain in or come back to the community in which they currently reside. It is also clear that all of the density and building projections noted in the Part 4.3.3 are made with the exclusion of all existing units taken into consideration.

This is especially troubling when coupled with the fact that the entire reconstruction or rehabilitation of Alder Grove will most likely have an adverse effect on a nationally recognized historic district whose legacy is tied to the housing and reintegration of the poor and working class families regardless of race and ethnicity into the middle class that has sustained Sacramento and the rest of the nation for many decades. The specific plan must provide clear direction to SHRA allowing existing public housing residents to reside in the specific plan area with minimal disruption.

Historic and Cultural Resources

Historic Preservation: The specific plan allows for the demolition of the New Helvetia Historic District (aka Alder Grove) and ignores community input from the last City community workshop, which requested the city to "Preserve the historic portions of Alder Grove" (page 13, Workshop Summary). The WBSP the historic importance of the New Helvetia Historic District's brick buildings and district located at Broadway and Muir Way, across from the historic Old City Cemetery. New Helvetia is the site of the first fight against segregation in Sacramento. The WBSP states that SHRA must follow state and federal rules, but then the WBSP states all buildings will be demolished, which does not meet the Secretary of Interior's Preservation Standards.
The New Helvetia Historic District (most of Alder Grove) is a national and state approved historic district that is listed on National Register of Historic Places meeting the criteria for historic significance in all three categories:

- Event: Landmark Civil Rights Litigation
- Person: Civil Rights Attorney Nathaniel Colley
- Design and Construction: Sacramento’s Best Architects

Only 3% of national listing meet all three categories (out of 92,375 listings) and only four sites in Sacramento meet all three categories.

The WBSP references an SHRA "Historic Preservation Strategy Review" report completed in 2015, but the plan fails to include details about the report. The historic preservation strategy recommended SHRA to retain at least one-half to three-quarters of the existing historic buildings and add housing density by removing some historic buildings. Yes, the WBSP recommends demolition of all historic buildings in New Helvetia Historic District. To mitigate the destruction of this historic site, the WBSP and suggests placing "monument" signs throughout the development that discusses Nathaniel Colley history.

SHRA's consultant, Page & Turnbull, states that “For a property to be eligible for national or state designation, the essential physical features (known as character-defining features) that enable the property to convey its historic identity must be evident. These distinctive character-defining features are the physical traits that commonly recur in property types and/or architectural styles. To be eligible, a property must clearly contain enough of those characteristics to represent its significance, and these features must also retain a sufficient degree of integrity. Characteristics can be expressed in terms such as form, proportion, structure, plan, style, or materials.” (page 12).

The consultant further states “In order to adequately convey the original site plan, at least half to three-quarters of the historic district—containing all building typologies—should be retained as it exists today, with modest or reversible changes introduced therein. Ideally, the central portion would be retained, as it contains all five building typologies and a range of orthogonal building groupings. This portion also contains the significant site and landscape features of the historic district. The perimeter edges of the district may be redeveloped with compatible new construction, to respond to adjacent neighborhoods and commercial corridors. It appears to Page & Turnbull that the core of the historic district may yet still have sufficient integrity to maintain eligibility for the National Register of Historic Places.” The WBSP recommendation of monument signs to mitigation for complete demolition of New Helvetia was loudly rejected by the community at the City's Community Workshop and does not meet the Secretary of Interior’s Historic Standards.

However, the specific plan recommends total demolition of the historical site with references to signage on the newly developed site that make reference to its historical significance. In contrast, page 5-5 of the specific plan notes that two building associated with the non-historic Sacramento Farmers Market located on 3rd and 5th Streets, will be adaptively re-used as a food and market hall and a community center for the Mill Project.

The specific plan must include historic preservation as a neighborhood, city, state and national priority with clear direction to preserve the New Helvetia Historical site in accordance with the Federal Secretary of Interior standards and guidelines. Demolition of this site, as recommended in this plan, does not meet the federal standards and guidelines as outlined in the National Historic Preservation Act.
The WBSP’s Alternative 2 - Historic Preservation Alternative is an inadequate alternative and should be redone to consider other ways to meet the WBSP Goals. Alternative #2 merely states it is keeping the existing historic buildings, with some modernization. Alternative #2 should be amended to consider adding density but keeping a majority of the historic buildings, in order to achieve the WBSP’s stated goal of more housing density and connectivity. There are many historic redevelopment examples that accomplished more housing density while preserving the historic district.

Traffic and Circulation

The WBSP allows for increased vehicle miles traveled as well as increased rates of greenhouse gas emissions in a census tract that has one of the highest vulnerability rates in the state for exposure to harmful airborne pollutants as well as traffic congestion. The WBSP calls for increased traffic flows through a nationally significant civil rights historical site as a way to mitigate future traffic congestion from increased auto use as a result of the Broadway Bridge, the employment center in the Downtown Grid, Arena activities and the future Waterfront revitalization plans. This harkens back to the Redevelopment era in Sacramento where census tract 21, which at the time of freeway construction was home to the largest African American population in the city. The Highway 50 connector was rerouted to go between W and X streets displacing African American residents along its path. Similarly, the WBSP uses racially segregated public housing to mitigate the need to increase downtown traffic flows.

The Muir Way alignment, the 8\textsuperscript{th} Street connector and new traffic corridors through the Alder Grove site only increase auto use and as a result, increase air pollutants in an already environmentally fragile location as CalEnviroScreen 3.0 makes perfectly clear. This portion of the specific plan does not meet the intent of SB 375, SB 535 and SB 1000, which call for sustainable community strategies and protections for disadvantaged communities. This transit plan does not reflect the state mandate for sustainability planning or protecting vulnerable disadvantaged residents at risk of even more exposure to environmental hazards created by poor planning decisions. The WBSP notes that community engagement data shows residents wanting to feel more connected, a need the WBSP mistakenly assumes is met through the new traffic design. However, the connectivity that the residents were referring to is the connection to jobs and opportunity rather than a street connection to increased traffic. It is highly inconceivable that the residents of Alder Grove requested an increase of traffic through their neighborhood.

The WBSP acknowledges that its new recommended street grid would negatively impact the New Helvetia Historic District. It suggests that it cannot be mitigated because the need for more "connectivity" to the community is needed. However, the proposed residential roads can be redesigned to decrease the impact to the district’s site plan, which is a contributing factor for its nominations. We request that the WBSP reconsider its current placement of its new residential streets. Again, we stress the misinterpretation of the resident requests for “connectivity” on the part of the city and its consulting team. Residents seek access to the social determinants that provide pathways for social and economic mobility so that their stay in public housing is transitional and temporary. They are not requesting increased traffic of fossil-fueled vehicles seeking short cuts to navigate traffic congestion at their front door.
Environmental Impacts
The Environmental Impact Report Implementation for the WBSP could result in operational emissions associated with the operation of new land uses within the Specific Plan Area. These activities would result in emissions of ROG, NOX, PM10, and PM2.5 that would exceed applicable thresholds established by SMAQMD. Nonetheless, emissions associated with the operation of new uses under the WBSP would exceed SMAQMD’s air pollutant thresholds, and therefore, would violate an existing air quality standard. This impact, states the EIR, would indeed be significant. The EIR further states that when the allowable development under the WBSP is considered together, it is estimated that the total emissions attributable to growth allowed within the Specific Plan Area would exceed the applicable thresholds for ROG, NOX, PM10, and PM2.5 and represents a considerable contribution to cumulative air pollutant emissions within the SVAB. This impact would be significant.

When ranked with other census tracts across the state, CalEnviroScreen 3.0 data ranks this location is in the 83rd percentile in terms of traffic congestion, a ranking that is considerably high. The WBSP transportation plan decreases the Levels of Service from A to F at the peak p.m. hours and does not mitigate either traffic or pollution increases that result from this plan. Adding to this negative impact, the EIR states that implementation of the WBSP, in combination with other cumulative development in the area, would involve an intensification of development and redevelopment activities within and in the vicinity of the Specific Plan Area, which could contribute to cumulatively air quality impacts in the area. As implementation of the WBSP, as a whole, would result in operational emissions that exceed SMAQMD thresholds, development under the WBSP would therefore be cumulatively considerable. Impacts would be significant. As previously stated above, the failure to address environmental concerns simply ignores the requirements of the legislative mandates contained in SB 375, SB 535, AB 1550 and SB 1000.

Conformity with General Plan
GOAL LU 2.4 of the 2035 General Plan seeks to create a “City of Distinctive and Memorable Places” by promoting community design that produces a distinctive, high-quality built environment whose forms and character reflect Sacramento’s unique historic, environmental, and architectural context, and create memorable places that enrich community life. Demolition of the New Helvetia public housing site, a nationally recognized historical site simply ignores the city’s general plan.

Policy LU 2.4.1: Unique Sense of Place. States that the City shall promote quality site, architectural and landscape design that incorporates those qualities and characteristics that make Sacramento desirable and memorable. Again, destruction of a nationally registered historical landmark that stand for the “equity” that the city states its commitment to directly and purposively operates against the city’s commitment to its residents.

Policy LU 2.4.2: Responsiveness to Context. The policy states that the City shall require building design that respects and responds to the local context. Nothing can be more responsive than to recognize the work that community members have done to successfully obtain recognition for the site on the National Register of Historic Places. Demolition of the New Helvetia historical site purposively flaunts any lack of acknowledgement of the city’s commitment to be responsive to context. This is especially troubling when coupled with the fact that the entire reconstruction or rehabilitation of Alder Grove will most likely have an adverse effect on a nationally recognized historic district whose legacy is tied to the housing and reintegration of the poor and working class families regardless of race. Interestingly, the study notes that two building associated with the non-historic Sacramento Farmers Market located on
3rd and 5th Streets, will be adaptively re-used as a food and market hall and a community center for the Mill Project away from the residents who need the center the most.

**Inadequate Community Center Proposed for Alder Grove (aka New Helvetia Historic District)**

The increased density proposed in the WBSP highlights the need for supportive functions for increase in low/very low residency. Therefore, an expanded role for a real community center with supportive services is needed for new Helvetia. A 2014 SHRA Residents' Survey identified the most desired services: indoor recreation space, a supermarket, a library, a bookstore, a health center. And at more recent WBSP community meetings, many SHRA residents and neighbors identified a community center to for the whole community.

According to WBSP, Alder Grove development on Broadway would keep its current sized community room -- 6,000 square feet. The current community room is inadequate for the existing 360 Alder Grove units. Yet, the WBSP almost triples the number of existing to 930 units, ignores the increased number of residents’ needs by keeping a small community room of 6,000 square feet. HUD requires SHRA to provide community centers and having an active, large center would be an asset to both SHRA residents and the community at large. Partnering with SHRA, Sacramento Public Library, educational entities, and non-profits organizations, a fully functioning center could provide more services to both SHRA residents and the community, such as recreational, meeting rooms, classrooms for after school programs, library services, educational classes, and lecture space.

Thank you for the opportunity to comment and we hope the Final WBSP adequately addresses our concerns and any negative impacts to the New Helvetia Historic District.

Sincerely,

Dan Visnich, Vice Chair  
NATHANIEL S. COLLEY, SR. CIVIL RIGHTS COALITION (CCRC)  
visnich@surewst.net  
(916) 718-2692

cc:  
City of Sacramento Council Members  
California Preservation Foundation  
Preservation Sacramento
Dear City of Sacramento Officials,

I am writing these comments on the West Broadway Specific Plan and Draft EIR as an individual resident in the upper land park neighborhood. I have owned property and lived with my family on Swanston between Muir and Riverside since 2010. Since moving here, we have been generally supportive of the efforts to redo the Alder Grove and other non-market housing in our neighborhood. We’re also aware of the state’s and City’s policies for new housing and are generally supportive of mixed use development.

I am writing these comments to note two areas where the Draft EIR does not satisfy CEQA’s fundamental purpose to serve as an informative document to the public and agency decision makers. I couldn’t tell from looking at the Draft EIR and accompanying analyses how the traffic in the area will be impacted in terms level of service degradations and how / whether those changes constitute a significant impact. The City should ensure that all supporting documentation for the traffic analyses is available.

I also could not tell from the GHG analysis how the Specific Plan actually comports with AB 32, SB 32, SB 350, and the various local GHG laws cited in the Draft EIR. The Draft EIR appears to simply state that it complies with the CAP checklist without providing analysis of project specific features. I would suggest reviewing the recent Newhall Ranch decision for more detail on the type of analysis envisioned for CEQA GHG documentation.

I look forward to seeing the Final EIR.

Respectfully submitted,

Brian Biering
Resident
972 Swanston Drive, Sacramento CA 95818
Date: March 9, 2020

To: Helen Selph, Associate Planner
    City of Sacramento
    Community Development Department
    300 Richards Blvd. 3rd Floor
    Sacramento, CA 95811

Re: Comments regarding the West Broadway Specific Plan

Thank you for the opportunity to comment on the proposed West Broadway Specific Plan (WBSP). JCH Research is a local consulting firm focused on neighborhood economic development, developing strategies for poverty intervention and understanding barriers to implementing climate change policies at the neighborhood level. JCH Research submits these comments following the review of the WBSP, the accompanying Environmental Impact Report dated December 2019, and attendance at local WBSP workshops and presentations. This review focuses on four key areas: historic preservation, traffic and circulation, environmental concerns, and conformity with the City General Plan.

**Historic Preservation:**
The proposed WBSP calls for the demolition of the New Helvetia Historical District. The importance of this site, listed on the National Register of Historic Places, cannot be overstated. During the early years of the City’s development, residential segregation on the basis of race was a primary urban planning technique used to isolate nonwhite residents from its more affluent white residents. As a result, Sacramento’s nonwhite residents were forced to reside in areas where racial restrictions allowed them to reside, a social and economic process with intergenerational outcomes that continue to divide the City’s residents today. New Helvetia was one site where such racial restrictions on residency were enforced. An important civil rights struggle, one with a profound legal impact at the national level, took place at the New Helvetia site. The resulting court case overturned segregation policies in the City’s public housing projects and became a foundational piece of housing discrimination litigation across the country. The importance of this case and this site is a primary reason it was listed on the National Register of Historic Places and indicates its cultural and social value to the City as well as the nation. The City needs to provide residents with clear information on how it determined that demolition has a higher priority than preservation without consideration of reasonable alternatives.

The WBSP references an SHRA "Historic Preservation Strategy Review" report completed in 2015, but the proposed plan fails to include any details about the report. The historic preservation strategy completed by SHRA consultants in 2015 recommended to retain at least one-half to three-quarters of the existing historic buildings and add housing density by removing only some of the historic buildings. Page & Turnbull, the consulting firm used by SHRA, noted that “For a property to be eligible for national
or state designation, the essential physical features (known as character-defining features) that enable the property to convey its historic identity must be evident. These distinctive character-defining features are the physical traits that commonly recur in property types and/or architectural styles. To be eligible, a property must clearly contain enough of those characteristics to represent its significance, and these features must also retain a sufficient degree of integrity. Characteristics can be expressed in terms such as form, proportion, structure, plan, style, or materials.” (page 12). Against this professional advice, the WBSP recommends demolition of all historic buildings in the New Helvetia Historic District.

To mitigate the destruction of this historic site, the WBSP suggests placing "monument" signs throughout the development that discusses the history of Nathaniel Colley. The WBSP recommendation of monument signs to mitigation for complete demolition of New Helvetia was rejected by the community at the City's Community Workshop and clearly does not meet the Secretary of Interior’s Historic Standards. In contrast, the WBSP recommends the repurposing of two building associated with the non-historic Sacramento Farmers Market located on 3rd and 5th Streets that “will be adaptively re-used as a food and market hall and a community center for the Mill Project.” Since the demolition of the site was not proposed by its residents, the standards and data used to arrive at the need for complete demolition of this historic site need to be revealed as part of the community engagement process. Without knowing how the City arrives at decisions presented in the WBSP, there is no effective way for community members to truly participate in the process and again calls into question the techniques used by the City to meet their community engagement requirements.

Recommending the demolition of the New Helvetia Historic District clearly does not meet the Secretary of Interior’s Preservation Standards and directly ignores the important historic value of the site. The historical designation really means that a significant event took place at New Helvetia; the knowledge of which must be preserved for the cultural and social benefit not just of the Sacramento community but for the nation. The question here is what criteria is the City using to justify total demolition? And who determines if such a priority is greater than that expressed by the residents and the Federal Department of the Interior? What metrics are used to arrive at that decision and have these metrics been presented to the residents? Community engagement activities have not conveyed any metrics for protection and therefore fail to meet the true intent of any community participation requirements. The WBSP states that SHRA must follow state and federal rules, however, the WBSP states all site buildings will be demolished. Since these directives are in conflict with each other, which directive does the public evaluate? Again, without any clear direction on how such a proposal can be fairly evaluated, the public engagement process used to provide input for the WBSP remains questionable at best. How do residents actually determine if demolition of the site is in their best interests? What criteria do they use to make this assessment?

Traffic and Circulation
The WBSP calls for increased traffic flows through a nationally significant civil rights historical site as a way to mitigate future traffic congestion from increased auto use along the Broadway corridor. It is clear from the EIR that the WBSP will result in higher levels of traffic congestion, which will only worsen in the future as density increases. Also, the WBSP encourages increased vehicle miles traveled by attempting to ease congestion anticipated from the Broadway Bridge, improved employment opportunities in the Downtown Grid, activities at the Golden One Arena and from the future Waterfront revitalization plans. In contrast to the EIR and WBSP, the current and future traffic problem results from planning decisions, not from uncontrollable inevitable urban growth. The consequences of economic growth must not be seen as collateral damage that cannot be prevented but instead as planning choices where economic decisions take priority over the needs and protections of residents.
Traffic problems produced by WBSP activities will also increase rates of greenhouse gas emissions in a census tract that has one of the highest vulnerability rates in the state for exposure to harmful airborne pollutants as well as traffic congestion. The proposed Muir Way alignment, the 8th Street connector and new traffic corridors through the New Helvetia historic site encourages increased auto use. As a result, WBSP increases air pollutants in an already environmentally fragile location; CalEnviroScreen 3.0 data make this abundantly clear. Moreover, this portion of the Specific Plan clearly conflicts with the intent of state climate change legislation, which calls for sustainable community strategies and protections for disadvantaged communities. This transit plan does not reflect the state mandate for sustainability planning or protecting vulnerable disadvantaged residents at risk of even more exposure to environmental hazards created by development under the WBSP. Please refer to the provisions of AB 32, SB 375, SB 535, AB 1550, SB 743 and SB 1000. Together, this bundle of state mandates specifically directs local governments to pursue investments in development that reduce the effects of climate change, reduce vehicle miles from fossil-fueled vehicles, and ensure proper environmental and social protections for administratively designated disadvantaged communities. Census Tract 22 is one such designated location. It is unclear how the WBSP actually incorporates the requirements of these legislative mandates. It is also unclear how the City can approve plans for development that conflict with these legislative directives. What are the factors that allow the city to make such decisions and how can residents equitably participate in these public decisions so that the public protections provided to them by state legislation are fully considered?

The WBSP acknowledges that its new recommended street grid would negatively impact the New Helvetia Historic District. It suggests that the impact cannot be mitigated because the need for more "connectivity" to the larger community is a priority. A similar approach of using racially segregated residential space to mitigate the need for increased traffic flows was used just one block north of the New Helvetia site. During the urban redevelopment period of the 1950s-1970s, new freeways were constructed to facilitate increased traffic flows to Downtown and bring connectivity from the east and west to the newly revitalized central business district. Interstate 5 cuts through Census Tracts seven and eight where hundreds of Japanese and Mexican households were displaced. The I-80 West/Highway 50 East connector, initially planned to run along Q Street east towards Folsom, was rerouted to run through Census Tracts 21 and 19, which at the time of freeway construction was home to the largest African American population in the city. Although not on a scale as large as freeway construction, the WBSP similarly uses racially segregated public housing to mitigate the need to increase downtown traffic flows that benefit the economic growth of others.

The WBSP notes that community engagement data shows residents wanting to feel more connected, a need the WBSP mistakenly assumes is met through the new traffic design. Here it is important to point out an important misinterpretation of the resident feedback seeking “connectivity” on the part of the city and its consulting team. It is difficult to understand that residents are requesting increased traffic of fossil-fueled vehicles at their front door from short cuts intended to mitigate administratively created traffic congestion. A more logical interpretation of the resident request for connectivity is that residents are seeking access to public resources that provide pathways for social and economic mobility so that their stay in public housing is transitional and temporary.

Environmental Impacts
The Environmental Impact Report for the WBSP states that development in accordance with the Specific Plan will increase emissions of ROG, NOX, PM10, and PM2.5. These emissions will exceed thresholds established by the Sacramento Metropolitan Air Quality Management District (SMAQMD). Therefore,
activities proposed in the WBSP would result in violations of existing air quality standards. The EIR anticipates that the total emissions attributable to growth allowed within the Specific Plan Area would exceed the applicable thresholds for ROG, NOX, PM10, and PM2.5 and represent a considerable contribution to cumulative air pollutant emissions. The EIR states that the impact would be significant.

CalEnviroScreen 3.0 data ranks this location (Census Tract 22) in the 83rd percentile in terms of traffic congestion, a ranking that is considerably high — meaning that the census tract has higher traffic congestion than 83 percent of the census tracts in California. Clearly, the WBSP proposal that encourages higher emissions in a location already identified as problematic should leave any resident with this information cause for concern. The WBSP transportation plan decreases the Levels of Service from A to F at the peak p.m. hours and does not mitigate either traffic or pollution increases that result from this plan. Adding to this negative impact, the EIR states that the intensification of development and redevelopment activities from the Specific Plan can contribute to cumulative air quality impacts in the area, which again, would result in emissions that exceed SMAQMD thresholds. Impacts from development under the WBSP would therefore be cumulatively considerable as well as significant. As previously stated above, the failure to address environmental concerns simply ignores the requirements of the previously noted legislative. At this point, it would be important for residents to understand the decision criteria that allows the City to place the WBSP in a position of higher priority than the mentioned legislative mandates.

Conformity with General Plan

The City’s General Plan provides residents as well as developers and investors in the built environment with a collection of policies and directives to follow in the development process. This plan provides a system of order to ensure a carefully planned urban settlement that considers an equitable as well as a sustainable quality of life. But how can residents be sure that the City is adhering to these policies? Specific Plans, in theory, should be in sync with the General Plan. But a cursory review of how the WBSP fails to acknowledge the General Plan is revealed in this small sample of General Plan goals and policies.

GOAL LU 2.4 of the 2035 General Plan seeks to create a “City of Distinctive and Memorable Places” by promoting community design that produces a distinctive, high-quality built environment whose forms and character reflect Sacramento’s unique historic, environmental, and architectural context, and create memorable places that enrich community life. Similarly, Policy LU 2.4.1 seeks to provide residents with a “Unique Sense of Place” and states that the City shall promote quality site, architectural and landscape design that incorporates those qualities and characteristics that make Sacramento desirable and memorable. Finally, Policy LU 2.4.2 states that the City shall require building design that respects and responds to the local context.

Demolition of the New Helvetia public housing site, a nationally recognized historical site, does not consider any of the above provisions of the General Plan. The destruction of a nationally registered historical landmark that memorializes civil rights recommended by the WBSP fails to recognize the City’s public commitment to equity for all of its residents. Sacramento residents recognized the importance of New Helvetia by successfully obtaining recognition for the New Helvetia Historical District on the National Register of Historic Places. The legacy of the nationally recognized historic district is tied to the housing and reintegration of the poor and working-class families regardless of race. Demolition of the New Helvetia historical site will clearly demonstrate the City’s failure to honor its General Plan, which expresses a commitment to be responsive to its residents and their unique context that makes up their living environment.
The question to be considered here is: what are the conditions that allow the City to approve plans that do not fully consider the General Plan? State legislation and General Plans exist to provide residents with necessary protections that promote and ensure quality of life. Historic designations of sites are also protections invoked to retain cultural and social knowledge and practices and to ensure that such values are promoted and become a fact of everyday life today as well as tomorrow. Given this vantage point, are General Plan provisions and state legislative mandates optional policies for the City? More important, what is the process for informing residents of the optional use of government mandates? If public protections can be considered secondary to city development priorities, is there an actual function for community engagement other than compliance with state and federal civil rights provisions?

This calls into question the community engagement process used for this specific plan process. Were residents informed of how development activities allowed under the proposed specific plan would actually worsen environmental conditions? Do the residents clearly understand how traffic would increase with development allowed and how new roads through public housing will be used to mitigate the anticipated traffic congestion on Broadway? Were the residents informed of the historical significance of the site with the detail that properly acknowledges its importance to residents of color? Are the residents informed of the legal actions and public activism that took place in the city that led to its national recognition?

How are residents to assess the impact of the Specific Plan without this knowledge? Given the educational and employment experiences of the residents, it’s difficult to conceive that that residents have made a thorough review of the written specific plan and the accompanying EIR - over 700 pages of text. More important, residents do not have any metrics to use in assessing whether the WBSP adequately represents their best interest.

The plan fails to consider any of the provisions of SB 1000, which requires local governments to incorporate environmental justice strategies for disadvantaged communities in their General Plan. Although the City is currently engaged in their General Plan update, nothing prohibits the City from incorporating these elements into the WBSP. Equity is not a mandate that should be postponed while policy is under development. The WBSP does not consider future energy needs or innovations for resilience planning such as microgrids. As a result, residents remain totally dependent upon utility company future plans and rate structures without the benefit of comprehensive energy planning at the neighborhood level. Specific plans must be in sync with state mandates and regional planning efforts for building sustainable communities. Without any real metrics to determine whether the West Broadway Specific Plan meets these guidelines, it is difficult to conclude that this plan is in the best interests of residents as the plan raises more questions than answers.

Should you require additional information regarding this review or have any questions, please do not hesitate to contact me at jch@jchresearch.net or by phone at 916.837.3679.

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