

West Broadway Specific Plan

Supplemental Materials – Response to Social Justice Concerns

August 2020

1. Comment: Concern that residents were not adequately engaged and informed.

- Response: The planning process included two rounds of well-attended community workshops; two rounds of neighborhood meetings with residents of Alder Grove, Marina Vista, and Land Park Woods; email updates; and other public meetings. The input from these meetings is summarized in the staff report in Attachment 6. More recently (August 6, 2020), the City and Sacramento Housing and Redevelopment Agency (SHRA) went on 97.5 KDEE to discuss the plan, SHRA's future for the housing communities, and to answer questions from callers. In mid-August 2020, the City published a frequently asked questions in the Sacramento Observer, on the City's website, and via the City's blog and other media. SHRA has provided the attached frequently asked questions to existing residents and managers of the public housing communities. The City and SHRA will be meeting with parents and staff at Leataata Floyd Elementary in September 2020.

2. Comment: The WBSP would result in demolition of the Marina Vista and Alder Grove public housing communities.

- Response: The WBSP allows for a range of potential development outcomes needed to support Sacramento Housing and Redevelopment Agency (SHRA) in their provision of affordable housing. The WBSP does not preclude demolition. Demolition of either public housing site would only occur if SHRA was able to prove to the United States Department of Housing and Urban Development (HUD) that rehabilitation of the units is not cost-effective. As provided in the staff report, Attachment 37, staff have suggested adding the following policy:

Policy HR-1.6: Consistent with HUD regulations and City of Sacramento 2035 General Plan Policy HCR 2.1.15, demolition of the New Helvetia Historic District is permitted only if rehabilitation of the resource is not feasible, demolition is necessary to protect the health, safety, and welfare of its residents, or the public benefits outweigh the loss of the historic resource.

- Response: HUD regulations require SHRA to provide relocation assistance if public housing units are rehabilitated or demolished and requires relocated residents to be allowed to return once the units are habitable. To clarify that the City supports these policies and desires to avoid displacement of the residents, staff is recommending the following changes to Policy H-2.1:

Policy H-2.1: Any project that would displace residents (including through rehabilitation or demolition) of one or more public housing units must provide relocation assistance to ensure provision of affordable housing to the affected residents. Provide replacement affordable housing shall be provided within the Specific Plan Area for the existing 751 public housing units serving the residents of Marina Vista and Alder Grove on an at least a one-to-one ratio. Relocated residents will be given the right to return to rehabilitated

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~~and/or new housing units within the Specific Plan Area. Provide replacement housing within or outside the Specific Plan Area. Replacement housing within the Sacramento City Unified School District boundary is encouraged.~~

3. Comment: The WBSP does not adequately address the future location of replacement housing.

- Response: As described above, staff is suggesting changing Policy H-2.1 to require replacement housing to be located within the Specific Plan Area.

4. Comment: The potential negative impacts to public housing residents of temporary or permanent relocation have not been addressed.

- Response Policy H-2.4 below (from the WBSP) ensures that development in the Alder Grove and Marina Vista sites is consistent HUD regulations.

Policy	H-2.4: Ensure that development in the Alder Grove and Marina Vista subareas is consistent with the Housing and Urban Development (HUD) regulations and obtains HUD approval.
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- Response: Federal (HUD) regulations protect residents of public housing:
 - Title 24 of the Code of Federal Regulations (24 CFR § 42.375) requires one-to-one replacement of public housing units. All occupied and vacant occupiable lower-income dwelling units that are demolished or converted to a use other than lower-income dwelling units in connection with an assisted activity must be replaced with comparable lower-income dwelling units located within the same neighborhood as the units replaced.
 - Under 24 CFR part 42 subpart C, any resident required to move must be offered temporary or permanent relocation benefits that include comparable replacement housing, moving assistance, and other relocation benefits that protect residents from being harmed or displaced.
 - Title 24 of the Code of Federal Regulations, Part 970 contains the requirements for the relocation of residents. Residents cannot be displaced from the property unless they are provided with comparable properties with equal or better amenities than the property from which they were displaced.

5. Comment: The WBSP does not require affordable housing development as shown in Policy H-2.2 and Policy H-2.3.

- Response: Staff recommends the following changes:

Policy H-2.2: Ensure that future development in the Marina Vista or Alder Grove subareas supports a mix of ~~housing affordable to low-income households, including mixed-income~~ ~~new market rate~~, workforce, and senior housing. All housing units shall be of high-quality design.

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Policy H-2.3: ~~Encourage~~ Ensure development of affordable low-income, workforce, and senior housing ~~in~~ throughout the Specific Plan Area.

6. Comment: Concern that Policy H-2.4 does not restrict private builders and local officials from advocating for changes to HUD regulations.

- Response: Staff has recommended changes to Policy H-2.1 (above) which parallels many of the existing HUD policies which protect public housing residents. These changes ensure that the City will independently implement these protections.

7. Comment: Concern that existing residents will not be able to benefit from improvements to nearby recreational facilities, including Miller Park.

- Response: The intention (as clarified in the amended Policy H-2.1) is that low-income residents may stay in the neighborhood as it improves. The plan provides for future recreation improvements that would benefit low-income residents in Land Park Woods, Alder Grove, and Marina Vista as well as residents that may move into the area as part of The Mill or other development projects.

8. Comment: Concern that the planned circulation network would lead to demolition of existing development.

- Response: Compliance with planned street networks is only required when there is new development and does not apply to existing structures/sites. The City may provide standards and guidelines for future development and use the Specific Plan to guide future development within the area, including within the Alder Grove subarea. This guidance allows the City to ask for new street connections if SHRA and HUD determine that the structures are more expensive to rehabilitate than demolish and rebuild. The street connections will only be required if buildings are demolished in the areas where such street connections are indicated. The street plan (and the Specific Plan in general) does not dictate that any portion of the Specific Plan Area must be demolished; it provides a roadmap for how the City wishes applicants to rebuild if a demolition occurs.

When Marina Vista and Alder Grove were built, they were surrounded by industrial land and the cemetery and were not well-connected to the residential neighborhoods to the south. Residents in Alder Grove, in particular, do not have easy access to the nearby schools. If this area were to be built now, the City would want the residents to have better access to amenities and ensure all residents, regardless of income, have a neighborhood that is not visibly different than any other community.

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The WBSP provides a street network that would allow for future connectivity if these areas are rebuilt; however, the exact location for streets would be determined on a project-by-project basis. As stated in Chapter 7, “the precise alignment of individual streets may be refined with future development.” The street grid would be implemented with new development and the precise alignment of the streets would be refined with individual project-level review.

Staff recommends adding a new policy:

Policy M-1.7: Figure 7-2 illustrates the connected grid network referenced in Policy M-1.1 and Policy M-1.3; however, the precise alignment of individual streets may be refined with future development.

9. Comment: Include a center to celebrate Nathaniel Colley’s contributions.

- **Response:** The WBSP includes the following policy and strategic action to ensure that Nathaniel Colley’s contribution is acknowledged in future development:
 - Policy HR-1.3: Interpret the history of the New Helvetia Historic District and the legacy of Nathaniel Colley in future development plans in the Alder Grove subarea.
 - Strategic Action HR-1.2: Interpretation of On-Site Resources. Explore placemaking opportunities through adaptive reuse of historic buildings, such as the circa 1940s cinder block building fronting 5th Street; interpretation of the city’s riverfront commerce and railroad history at Miller Regional Park; and development of a digital heritage trail to commemorate and interpret the historic features and history of the New Helvetia Historic District and the legacy of Nathaniel Colley.
- Beyond the WBSP, the City has also been working to recognize Nathaniel Colley through the designation of one of his office buildings as a listed historic landmark.
- SHRA has said they are willing to include commemorative elements in any future development proposals at Alder Grove.

10. Comment: Build more affordable housing and build it before demolishing the older affordable housing so as to alleviate any potential for adverse impacts of relocating existing low-income residents.

- **Response:** Some comments have asked the City to find money to build more housing. The benefit of having an adopted specific plan like the WBSP is that it provides documentation for the City and/or SHRA to show potential funders that there is official support and policies in place to build affordable housing. Having both a specific plan and a certified environmental impact report removes barriers to developers of affordable and market-rate housing. The WBSP supports the rehabilitation of the existing public housing and provides options for the development of mixed-income neighborhoods

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where low-income residents can live side-by-side in high-quality housing with increased access to amenities, recreation, and transportation (which helps them connect better to local employment opportunities). The WBSP is the first step of many towards providing existing and future low-income residents with a higher quality of life and better housing.



CURRENT EVENTS

A message from Sacramento Housing and Redevelopment Agency
for residents in our housing communities

West Broadway Specific Plan Frequently Asked Questions (FAQ)

1. Is my housing in danger of being demolished?
The Housing Authority has no plans to demolish the housing at Alder Grove, Marina Vista, or any of its existing Public Housing properties. The Housing Authority is working to rehabilitate all of its Public Housing communities over the next 7 to 10 years.
2. What is the West Broadway Specific Plan?
The West Broadway Specific plan is simply a plan that the City of Sacramento is proposing that would help shape guidelines that future developers would need to consider and/or follow when proposing rehabilitation or construction in the West Broadway area. It is not an order by the City directing developers to demolish Alder Grove or Marina Vista.
3. Is this related to the Choice Neighborhood Initiative grant (CNI) planning that happened a few years ago?
This is indirectly related. If that grant had been implemented, and this plan was approved and in place, the construction project would have needed to adhere to the guidance and restrictions placed in the plan. The Housing Authority opted to not proceed with the CNI project at these two sites.
4. I heard that SHRA is planning to use the Rental Assistance Demonstration program to improve my housing. What is that program?

The Rental Assistance Demonstration Program is a program created by HUD to allow Housing Authorities to move their Public Housing units over to a more stable project-based Section 8 program. Properties can basically carry debt and have private investment, which would help to fund the needed capital improvements for each property (for example, allowing the Housing Authority to provide new cabinets, countertops, roofs, windows, air conditioning, etc.).

The Housing Authority is in the middle of its first RAD project, converting 124 units of Public Housing across 6 sites. Construction will be completed before Summer 2021.

5. When will the Housing Authority begin work on Alder Grove and Marina Vista?
These two communities are the largest within the Housing Authority's portfolio—and as a result have some of the highest costs for rehabilitation. The Housing Authority plans to address Marina Vista in 2023 and construction happening in 2024—based on funding availability, approval and engagement with Marina Vista residents, and approval from HUD and the local governing bodies. Alder Grove is looking to be addressed in 2030, and construction starting in 2031, based on funding availability, engagement and approval from Alder Grove residents, approval from HUD and the local governing bodies.
6. 2023? 2030? That's a long time from now, what if there are building/unit needs between now and then?
The Housing Authority will continue to receive funds from HUD in the form of the Capital Fund Grant. This grant will be specifically used to address capital needs/improvements on the property. Some of the work that we've used these funds on are:

- Roof replacement
- HVAC repair/replacement
- Sidewalk and Fencing repairs
- Gas line replacement

The Housing Authority is committed to providing decent, safe, and sanitary housing and will continue to utilize the funding available to it to preserve its current housing inventory, even as other properties are rehabilitated.

7. How can I learn more information about this plan and its potential impact on the future of my community?
Please feel free to reach out to your respective Regional Managers.
For Alder Grove: Robbie Folkes (916) 449-6291 For Marina Vista: Sarah Alegria (916) 449-6382
Questions will be collected from these calls, and answers will be posted to the SHRA website at a later date.