January 31, 2014

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

Subject: Draft Environmental Impact Report (DEIR) for the Sacramento Entertainment and Sports Complex & Related Development Project (SCH # 2013042031)

Dear Mr. Johnson,

Thank you for the opportunity to comment on the DEIR on the proposed Entertainment and Sports Center (ESC) and Related Development project.

Safe Ground Sacramento’s mission as a nonprofit is to create model communities where people experiencing homelessness can live in safety and dignity, without threat of violence, harassment or arrest while taking the first step out of homelessness. Following HUD’s Housing First model, our planned first step community will house 100 of the most vulnerable on our streets and provide extensive healthcare and social services through collaborative partnerships. The Sacramento Regional Coalition to End Homelessness’ mission is to end and prevent homelessness in the Sacramento region through policy analysis, community education, collective organizing and advocacy.

Jointly we believe that the Proposed Project, properly planned and implemented as an important enhancement to the city’s downtown infrastructure could provide a major contribution to the health and vibrancy to the future of Sacramento’s CBD. As the capital city of California we must work together to ensure that the needs of all the members of the community are satisfactorily addressed as this important project moves forward. This must include the low income and homeless individuals that populate the areas of downtown Sacramento in and adjacent to the proposed ESC.

Our concerns are primarily focused on Housing plans in the DEIR, and notably, the inadequacies of the DEIR to speak to the needs of the homeless individuals and SRO residents that will be displaced by the ESC Development Project. The DEIR fails in this regard to recognize and show consistency with important elements of the 2013-2021 Housing Element. In particular the following elements need to be addressed with the aforementioned homeless and very low income groups in mind:
H-1.3.1 Social Equity. The City shall encourage economic and racial integration, fair housing opportunity, and the elimination of discrimination.

H-1.3.2 Economic Integration. The City shall consider the economic integration of neighborhoods when financing new multifamily affordable housing projects.

H-1.3.4 A Range of Housing Opportunities. The City shall encourage a range of housing opportunities for all segments of the community.

Historical Considerations
The homeless population in Sacramento has historically been displaced without sufficient plan for where they can go, when our efforts to improve the CBD infrastructure fail to recognize the needs of the homeless population and include solutions in the plans. Fifty-one years ago when Sacramento’s historic West End was designated for redevelopment and historical preservation as Old Sacramento, the Sacramento Redevelopment Agency of the City of Sacramento failed in their Master Plan, to address the needs of the homeless and low income people that would be displaced.

Soon thereafter the Sacramento City Council requested that the County Welfare Council prepare a report on this homeless population. An earlier investigation by the Sacramento Redevelopment Agency had found that 5,500 men lived in the West End and reported that over 50% of the men were over 55 years of age with an average income of $1,762 per year. By 1963, prior to the start of the urban renewal in the West End, the Agency was reporting an ongoing population of 1,400 but was unable to account for the 4000 men who had moved from the West End. However, the Agency reported that they believed 55% of the men had moved to areas adjacent to the West End. That would include the CBD where the ESC project is now to be sited.

Of the remaining 1400 homeless men, the agency found that 795 had lived in the same place over 30 days and stated they were the agency’s responsibility to relocate as West End (Old Sacramento) redevelopment proceeded. At the same time the agency reported that little was known about the needs of the other 600 men living in the West End skid row or about the existence of a third group of undetermined number that lived in the area but not in an SRO. It was estimated from records of people providing food for these men that at least 350 lived outdoors.

The 1964 Plan stated that a list of recommended partial solutions including a men’s Service Center, a new City Park, and a broadening of County unemployment policy to include helping these men. The 1964 plan further stated that these recommendations were designed in a way that was intended to encourage the maximum “self-reliance” possible. It also recommended that a second report be completed that would contain recommendations for skid row alcoholics that are a police problem, as well as a problem to feed and house. No finalized, published second report could be found in our research.

The redevelopment of the West End skid row into the commercial, tourist and recreational oriented Old Sacramento proceeded during the 1960s and 1970s. A significant problem was encountered as a portion of the population of single men, the alcoholics who never managed a
move, spilled over into the downtown business district. It should be noted that this plan addressed help for those who already were the ones best positioned to be able to navigate a move and ignored, in terms of a concrete plan, those who most needed help and support.

Further Recommendations
Since the redevelopment of the West End there has been a continuous and significant homeless and very low income population in the CBD. Safe Ground Sacramento and the Sacramento Regional Coalition to End Homelessness are concerned that the DEIR does not address the needs of this population that will again be displaced by the ESC. We recommend attention to historical mistakes in our redevelopment efforts and an effort to make this a project that includes a plan for this vulnerable population.

Again, referring to the 2013-2021 Housing Element, we point to the following element:

**H-3.1.1 Promote Extremely Low Income Housing.** The City shall promote the citing, production, rehabilitation, and preservation of housing for ELI households, including nontraditional housing types. Example: Unregulated SRO and other units in the surrounding area will be priced out.

Members of the downtown homeless community have reported to Safe Ground that since the announcement of this project they have been experiencing increased enforcement of city ordinances designed to criminalize their homelessness. This city law enforcement effort has been publically verified in community meetings by members of the Sacramento Police Department.

Safe Ground Sacramento and the Sacramento Regional Coalition to End Homelessness believe that rather than spend additional tax payer dollars on enforcement of these ordinances, the City of Sacramento and Basketball Holdings, LLC have an opportunity to help all Sacramentans by including a plan for those that will be displaced. This can be accomplished by addressing the Housing Element sections addressed in this letter.

Additionally, as members of the Sacramento Coalition for Shared Prosperity (SCSP), Safe Ground Sacramento and the Sacramento Regional Coalition to End Homelessness support the recommendations of SCSP in the proposed Community Benefits Agreement. Specifically here, we are voicing support for the recommendation of the coalition that the City, Basketball Holdings, LLC, and homeless social services work together to fund a foundation to develop this first-step transitional housing community.

Thank you for considering these comments. As members of the SCSP we wish to meet with key partners of the Basketball Holdings, LLC to discuss mitigation on behalf of the populations that will be displaced as related above. Pursuant to Pub. Res. Code Section 21092.2 and Gov. Code Section 65092, please notify the undersigned in writing of any hearings, decisions, notifications, or actions related to this Project.

Please contact us directly if you have any questions or require more information from Safe Ground Sacramento, Inc. or the Sacramento Regional Coalition to End Homelessness.
Best Regards,

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