

Appendix B

Notice of Preparation Scoping Comment
Letters

DEPARTMENT OF TRANSPORTATION

DISTRICT 3
703 B STREET
MARYSVILLE, CA 95901
PHONE (530) 741-4286
FAX (530) 741-5346
TTY 711



*Serious drought.
Help save water!*

August 9, 2018

GTS# 03-SAC-2018-00281
SCH# 2018072032

Mr. Tom Buford
Principal Planner
City of Sacramento
300 Richards Blvd, 3rd floor
Sacramento, CA 95816

Notice of Preparation for the West Broadway Specific Plan Draft Environmental Impact Report

Dear Mr. Buford,

Thank you for including the California Department of Transportation (Caltrans) in the review process for the project referenced above. Caltrans' new mission, vision, and goals signal a modernization of our approach to California's transportation system. We review this local development for impacts to the State Highway System (SHS) in keeping with our mission, vision and goals for sustainability/livability/economy, and safety/health. We provide these comments consistent with the State's smart mobility goals that support a vibrant economy, and build communities, not sprawl.

The proposed specific plan will include land use regulations designed to streamline the housing development process and support new development in the specific plan area consistent with the 2035 General Plan, including a mix of a traditional and urban-scale housing with neighborhood commercial uses. The specific plan area is generally bounded by the Sacramento River and Interstate 5 (I-5) to the west; Broadway and U.S. Route 50 (US-50) to the north; 5th Street and Muir Way on the east, and 4th Avenue to the south. The following comments are based on the Notice of Preparation (NOP) for a Draft Environmental Impact Report (DEIR) received.

Forecasting/Traffic Operations

Based on the project information provided, a Multi-Modal Transportation Impact Analysis should be prepared to assess potential impacts to I-5 and US-50. The analysis should measure Vehicle Miles Traveled (VMT) generated by the project with a trip distribution diagram and analyze and identify any potential safety issues for all modes of transportation.

"Provide a safe, sustainable, integrated, and efficient, transportation system to enhance California's economy and livability"

The scope of the analysis should include, but not limited to, I-5 and US-50 mainline, ramps, and ramp intersections at interchanges and freeway connections. Mitigation proposed in the analysis should include Transportation Demand Management and Access Management projects and strategies that increase multimodal access and reduce VMT on the SHS.

Currently, I-5 and US-50 operate at a LOS of F during AM and PM peak hours, and it is anticipated this project would contribute significant congestion to the freeway system. Because of this, a Traffic Impact Study (TIS) is required. The geographic scope of the traffic study should include, but not limited to, the following locations:

US-50 locations

- 10th Street Off-Ramp (WB)
- 5th Street Off-Ramp (EB)
- 15th Street Off-Ramp (EB)
- 11th Street On-Ramp (EB)

I-5 locations

- Broadway Off-Ramp (NB)
- 5th Street On-Ramp (I-5 NB and SB and US-50 WB)
- X St Off-Ramp at 3rd Street

The traffic study should include length of queue analysis using SimTraffic for the ramps listed above. Traffic impacts to mainline US-50 and I-5 and the associated connectors throughout the project area should also be studied.

Based on the size of the project the study area may need to be extended to the nearby freeways such as I-80, State Route 99 (SR 99) and SR 51. The TIS must also contain suggested mitigation measures, which would be placed in the environmental document prepared for the project. The TIS should incorporate the following scenarios:

- Existing conditions without the project for the current year
- Existing conditions plus the project by phases
- Cumulative condition without the project
- Cumulative condition with project build-out

Due to recent implementation of SB 743, VMT analysis is also required for this development. Complete Street Plan should be included in the VMT analysis to identify bikeway and sidewalk connection to nearby parks, schools, any nearby public transit locations.

Under the Traffic/Circulation and Cumulative Impacts, the EIR should address the trip distribution based on a select zone analysis. The impacts from this project and proposed mitigations to the roadways should be addressed. Please provide a trip generation, base year volumes, future volumes, growth rates and distribution based on a select zone analysis.

Hydrology/Hydraulics

The development of this site will increase impervious surface area through the construction of roads, driveways, parking lots, buildings, etc. with a corresponding increase in surface water runoff. This project will decrease surface water detention, retention and infiltration. No net increase to 100-year storm event peak discharge may be realized within the State's highway right of way and/or Caltrans drainage facilities because of the project. Any cumulative impacts to Caltrans drainage facilities arising from effects of development on surface water runoff discharge from the 100-year storm event should be minimized through project drainage mitigation measures.

Increases in peak runoff discharge for the 100-year storm event to the State's highway right of way and to Caltrans' highway drainage facilities must be reduced to at or below the pre-construction levels. The cumulative effects on drainage due to development within the region should be considered in the overall development plan of this area.

All grading and/or drainage improvements must maintain or improve existing drainage pathways and may not result in adverse hydrologic or hydraulic conditions within the State's highway right of way or to Caltrans drainage facilities. The developer must maintain or improve existing drainage patterns and/or facilities affected by the proposed project to the satisfaction of the State and Caltrans. This may be accomplished through the implementation of storm water management Best Management Practices (i.e., detention/retention ponds or basins, sub-surface galleries, on-site storage and/or infiltration ditches, etc.). Once installed, the property owner must properly maintain these systems. The proponent/developer may be held liable for future damages due to impacts for which adequate mitigation was not undertaken or sustained.

Runoff from the proposed project that will enter the State's highway right of way and/or Caltrans drainage facilities must meet all regional water quality control board water quality standards prior to entering the State's highway right of way or Caltrans drainage facilities. Appropriate storm water quality Best Management Practices may be applied to ensure that runoff from the site meets these standards (i.e., is free of oils, greases, metals, sands, sediment, etc.). Once installed, the property owner must properly maintain these systems in perpetuity.

All work proposed and performed within the State's highway right of way must be in accordance with Caltrans' standards and will require a Caltrans Encroachment Permit prior to commencing construction.

Encroachment Permits

Because the project will cross Caltrans' right of way, we require the applicant to submit a completed encroachment permit application, environmental documentation, and five sets of plans clearly indicating Caltrans right of way to:

Hikmat Bsaibess
California Department of Transportation
District 3, Office of Permits
703 B Street Marysville, CA 95901

"Provide a safe, sustainable, integrated, and efficient, transportation system to enhance California's economy and livability"

I-5 Subregional Corridor Mitigation Program (SCMP)

The SCMP is a voluntary impact fee program for new development within the I-5, SR 99, SR 51, and US-50 corridors between the cities of Elk Grove, Sacramento, and West Sacramento. The SCMP was developed with each city in collaboration with Caltrans for promoting smart growth, reducing daily congested vehicle miles traveled (VMT) and delay on the SHS, and reduce daily VMT on the regional transportation system through funding an array of projects that includes all modes.

Through the I-5 SCMP, impact fee contributions can be made in lieu of conducting a detailed traffic impact study for freeway mainline impacts, including freeway mainline analysis, “merge and diverge” analysis and weaving analysis on the mainline under either existing and cumulative conditions. If the applicant chooses to contribute towards the SCMP, the applicant would still be required to analyze intersection impacts, off-ramp traffic back-up onto the freeway mainline, and any significant safety issues near the intersection.

If the applicant elects not to contribute towards the SCMP, then a detailed traffic impact study may be required, along with mitigation measures, to lessen impacts to acceptable levels that are consistent with local and regional plans.

Impact fee contributions to the I-5 SCMP would go towards funding local and regional projects. Some potential projects that would benefit the project includes the Kammerer Road extension from I-5 to SR 99, transit improvements through the Elk Grove Intercity Rail Station, Hi Bus from Cosumnes River College to Elk Grove, and SR 99 auxiliary/transition lanes along the SR 99 corridor in the cities of Sacramento and Elk Grove.

Please provide our office with copies of any further actions regarding this project. We would appreciate the opportunity to review and comment on any changes related to this development.

If you have any questions regarding these comments or require additional information, please contact Alex Fong, Intergovernmental Review Coordinator at (530) 634-7616 or by email at: Alexander.Fong@dot.ca.gov.

Sincerely,



KEVIN YOUNT, Branch Chief (Acting)
Office of Transportation Planning
Regional Planning Branch – South

Cc: State Clearinghouse

From: [Scott Johnson](#)
To: [Chaffee, Craig \(MHSD-FMOR\)@DHCS](#)
Cc: [Genevive Taylor](#); [Craig Chaffee](#); [Tom Buford](#)
Subject: RE: Input as resident in NWLP area where you are planning development.
Date: Wednesday, July 25, 2018 12:10:50 PM

Dear Mr. Chaffee,

Thank you for your response to the Notice of Preparation (NOP) of an Environmental Impact Report for the West Broadway Specific Plan project. Your concerns will be included with responses and comments provided on the NOP to assist in the preparation of the draft environmental impact report.

Thank you,

Scott Johnson
City of Sacramento
Community Development Department
Environmental Planning Services
300 Richards Blvd., 3rd Floor
Sacramento, CA 95811
(916) 808-5842
srjohnson@cityofsacramento.org

From: Chaffee, Craig (MHSD-FMOR)@DHCS <Craig.Chaffee@dhcs.ca.gov>
Sent: Wednesday, July 25, 2018 12:01 PM
To: Scott Johnson <SRJohnson@cityofsacramento.org>
Cc: Genevive Taylor <semperfitaylor@sbcglobal.net>; Craig Chaffee <cjchaffee@comcast.net>
Subject: FW: Input as resident in NWLP area where you are planning development.

Dear Mr. Johnson,

I got the following email reply from Mr. Buford forwarding to you to make sure this was received "on time" for any community input deadline on this matter.

I am out of the office and will return Friday, August 3, 2018. If you need immediate assistance please contact Scott Johnson at srjohnson@cityofsacramento.org or phone at (916) 808-5842.

Thank You.

From: Chaffee, Craig (MHSD-FMOR)@DHCS
Sent: Wednesday, July 25, 2018 11:48 AM
To: 'tbuford@cityofsacramento.org' <tbuford@cityofsacramento.org>

Cc: 'Helen Selph' <HSelph@cityofsacramento.org>; 'Greg Sandlund' <GSandlund@cityofsacramento.org>; 'Genevive Taylor' <semperfitaylor@sbcglobal.net>; 'Craig Chaffee' <cjchaffee@comcast.net>

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Dear Mr. Buford,

I was planning on attending the City/consultant meeting tonight on West Broadway/NWLP planning. But as a still working senior citizen (and grandparent) I'm not sure I'll brave the heat, and attend in person. So I'm offering some input here as a LONG TERM resident of the area. I've communicated numerous times with Helen Selph too. I find her responsive and informative. Most appreciated! She can likely share previous communications. Below I try to focus on CEQA/EIR related concerns. I've included Art Taylor – Board Member on our Land Park Community Association. Mr. Taylor has been very involved in the public housing issues for a long time.

Helen Selph communicated to me about possible CEQA 'Streamlining' on this project: "Detailed evaluation of potential residential and mixed use projects proposed under the Northwest Land Park Specific Plan will expedite the approval process for future projects that are consistent with the Northwest Land Park Specific Plan. Depending on the characteristics of future projects, streamlining under the Northwest Land Park Specific Plan EIR may range from a complete exemption to preparation of a focused, project-specific environmental document. (Please note that due to Federal funding requirements, any re-development of Marina Vista and Alder Grove public housing properties will require additional environmental review, including NEPA)."

My family has lived in the small surrounding fragile neighborhood since 1980.

I consulted a lawyer knowledgeable on CEQA/EIRs. The City and their consultants (partially hired because of their knowledge/experience on how to "fast track" CEQA/EIR reviews) should not try to use the 'fair share affordable housing' concept to fast track the CEQA/EIR reviews in an area already plagued with a gross over-concentration of public housing (PH). That is political and hypocritical. That is not a correct use of the fair share concept for fast tracking CEQA/EIR reviews. Community has right to legally dispute the PH overconcentration /resulting community problems for decades using CEQA; such CEQA reviews can and should include socioeconomic issues too.

Here's some main points for the City/consultants.

- My family and most neighbors support the principles of fair share affordable housing.
- However, City/consultants should not try to use the fair share affordable housing concept to fast track the CEQA/EIR review in an area already plagued with a gross over-concentration of PH. Instead the City/consultants should use the fair share

principles and facts about the existing overconcentration of public housing in this one little area to support long term plans to spread PH and other affordable housing throughout City AND County, not to keep it over-concentrated in this one little area

- Related City Council Reports (e.g., April 3, 2018) on funding these consultants and working on this West Broadway/NWLP plan say “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.” The final plan must accomplish this equitable distribution of affordable housing throughout Sacramento, not over-concentrating it here.
- The State Office of Environmental Health Hazard Assessment (OEHHA) shows that this specific West Broadway/NWLP area of Sacramento is one of the most polluted areas and negatively impacted by socioeconomic challenges in the County AND State. The overconcentration of public housing in this area drives OEHHA’s very troubling rankings of high poverty and unemployment, This little Sac area contains over 44% of all of SHRA’s PH units in the ENTIRE City limits, one of the largest concentrations of PH anywhere in the Western United States.
- EACH of the 2 PH projects is, by far, the largest in the entire Sacramento area. This unhealthy overconcentration is the result of the failed last century government policy of cramming too much public housing in one place – based on racism, NIMBY by more powerful neighborhoods accepting NONE/ZERO, and political expediency. And, right next door to these two huge PH projects, the City/SHRA converted a 75 unit apartment complex it promised the neighbors would always only be for seniors into all low-income all age units. The seniors left because the PH projects made it a dangerous area to live.
- For many decades the overconcentration in this one small Sacramento area has caused major problems for the project tenants, surrounding neighbors and taxpayers. This neighborhood became the most violent area in all of Sacramento in the early 90’s.
- The evidence is clear. Placing too much public housing in one little area results in major problems: Overconcentration of poverty, substance abuse and other mental health disorders, child neglect, crime, delinquency, poor education, unemployment and many others. It’s warehousing those in need.
- Sacramento must develop and implement a vision and plan to spread and integrate effective public and other affordable housing throughout Sacramento using fair share principles. Please don’t leave both of these two huge PH projects crammed in this one small Sacramento area.

Thank You. I appreciate my comments being recorded/ added to community input, and concerns addressed/mitigated.

From: [Chaffee, Craig \(MHSD-FMOR\)@DHCS](mailto:Chaffee,Craig(MHSD-FMOR)@DHCS)
To: [Scott Johnson](#)
Cc: [Genevive Taylor](#); [Craig Chaffee](#); [Tom Buford](#)
Subject: RE: Input as resident in NWLP area where you are planning development.
Date: Wednesday, July 25, 2018 12:32:49 PM

Dear Mr. Johnson,

Thank you for your responsiveness. Since 1980 when my wife and I moved to the little neighborhood ("Upper Land Park) with the 2 huge failed past century government projects (e.g., Seavey Circle and Alder Grove) we have been assured many times by government officials (e.g. past SHRA Director) that they understood that concentrating so much poverty and public housing in one little area (warehousing) was a failed government practice, and that at least half of the existing public housing units crammed in this one tiny little Sac area must be moved/integrated into other Sac areas using fair share principles. Yet, push comes to shove and NIMBY, the 2 huge projects have been left here by government, with all the major and costly problems – decade after decade. Below is a direct communication from the Mayor's Office on the issue. Must hard working tax paying homeowners all leave – seek higher safer ground? Will the City ever actually make good on their promises, or just build more of the same here, put more lipstick on the pig, and give it some fancy new name (e.g., Seavey Estates)? Again thank you for anything you can do to help affect real positive change for this very fragile community you now called North West Land Park.

Hi Craig,

Thanks for writing to the Mayor about the concern a of overconcentration of public housing in Upper Land Park.

I understand what I say does not carry the weight of what Darrell says or what I may communicate his position to be. To that end, here are Darrell's thoughts on the issue from him personally:

"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."

Warm regards,

**Kelly F. Rivas
Campaign Manager**

From: Scott Johnson <SRJohnson@cityofsacramento.org>
Sent: Wednesday, July 25, 2018 12:11 PM
To: Chaffee, Craig (MHSD-FMOR)@DHCS <Craig.Chaffee@dhcs.ca.gov>
Cc: Genevive Taylor <semperfitaylor@sbcglobal.net>; Craig Chaffee <cjchaffee@comcast.net>; Tom Buford <TBuford@cityofsacramento.org>
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From: Chaffee, Craig (MHSD-FMOR)@DHCS

Sent: Wednesday, July 25, 2018 11:48 AM

To: 'tbuford@cityofsacramento.org' <tbuford@cityofsacramento.org>

Cc: 'Helen Selph' <HSelph@cityofsacramento.org>; 'Greg Sandlund' <GSandlund@cityofsacramento.org>; 'Genevive Taylor' <semperfitaylor@sbcglobal.net>; 'Craig Chaffee' <cjchaffee@comcast.net>

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To: [Tom Buford](#)
Cc: [Helen Selph](#); [Greg Sandlund](#); [Genevive Taylor](#); [Craig Chaffee](#)
Subject: Input as resident in NWLP area where you are planning development.
Date: Wednesday, July 25, 2018 11:48:18 AM

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From: [Scott Johnson](#)
To: [Craig Chaffee](#)
Cc: [Tom Buford](#); craig@eyeonsacramento.org; "Genevive Taylor"; Craig.Chaffee@dhcs.ca.gov
Subject: RE: Please include all of the following emails/information in the formal written record of public comment on the West Broadway/NWLP planning efforts and EIR and CEQA work specifically.
Date: Thursday, August 2, 2018 7:50:33 AM

Dear Mr. Chaffee,

Thank you for your additional response to the Notice of Preparation (NOP) of an Environmental Impact Report for the West Broadway Specific Plan project. Your concerns will be included with responses and comments provided on the NOP to assist in the preparation of the draft environmental impact report.

Thank you again,

Scott Johnson
City of Sacramento
Community Development Department
Environmental Planning Services
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Sacramento, CA 95811
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srjohnson@cityofsacramento.org

From: Craig Chaffee <cjchaffee@comcast.net>
Sent: Wednesday, August 1, 2018 5:19 PM
To: Scott Johnson <SRJohnson@cityofsacramento.org>
Cc: Tom Buford <TBuford@cityofsacramento.org>; craig@eyeonsacramento.org; 'Genevive Taylor' <semperfitaylor@sbcglobal.net>; Craig.Chaffee@dhcs.ca.gov
Subject: Please include all of the following emails/information in the formal written record of public comment on the West Broadway/NWLP planning efforts and EIR and CEQA work specifically.

Dear Mr. Johnson. City West Broadway/NWLP Area Planning team,

It is my understanding that public input on the “West Broadway/Northwest Land Park Plan project work related to the EIR and CEQA are still being accepted.

Please include/record this email and all its contents in the community/public input for this planning project and related EIR and CEQA work.

Please make sure to address and plan to mitigate the related issues in your EIR and CEQA work.

Please let me know if you have any questions/etc. My family and so many others in this community strive for a much safer community and environment free from such hazards to live in and raise our families. Thank You.

Again, I've been advised by a lawyer very knowledgeable in such law/subject matter that CEQA covers socioeconomic impacts; there is authority that they're covered. The following 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 4 of the Environmental Handbook](http://www.dot.ca.gov/ser/vol1/sec5/ch36eir/chap36.htm#required), for example: <http://www.dot.ca.gov/ser/vol1/sec5/ch36eir/chap36.htm#required>

As state below to your office on July 25, 2018 (in email below):

- The State Office of Environmental Health Hazard Assessment (OEHHA) shows that this specific West Broadway/NWLP area of Sacramento is one of the most polluted areas and negatively impacted by socioeconomic challenges in the County AND State. The overconcentration of public housing in this area drives OEHHA's very troubling rankings of high poverty and unemployment. This little Sac area contains over 44% of all of SHRA's PH units in the ENTIRE City limits, one of the largest concentrations of PH anywhere in the Western United States.
- EACH of the 2 public housing projects in this area is, by far, the largest in the entire Sacramento area. This unhealthy overconcentration is the result of the failed last century government policy of cramming too much public housing in one place – based on racism, NIMBY by more powerful neighborhoods accepting NONE/ZERO, and political expediency. And, right next door to these two huge PH projects, the City/SHRA converted a 75 unit apartment complex it promised the neighbors would always only be for seniors into all low-income all age units. The seniors left because the PH projects made it a dangerous area to live.
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- The evidence is clear. Placing too much public housing in one little area results in major problems: Overconcentration of poverty, substance abuse and other mental health disorders, child neglect, crime, delinquency, poor education,

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major problems in this area/community.

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[\[mailto:MayorSacramento@mail.senecagov.com\]](mailto:MayorSacramento@mail.senecagov.com)

Sent: Tuesday, January 23, 2018 3:38 PM

To: Craig Chaffee

Subject: Re: FW: Sent following letter to Bee editors to publish and posted on our Next Door site.

Luis Montes has responded:

Dear Craig Chaffee,

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Thank you, again, for contacting our office. Mayor Steinberg appreciates hearing from you.

Sincerely,

Luis Montes

Director of Constituent Affairs

Office of Mayor Darrell Steinberg

LMontes@cityofsacramento.org

From: Chaffee, Craig (MHSD-FMOR)@DHCS
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To: 'Scott Johnson' <SRJohnson@cityofsacramento.org>
Cc: Genevive Taylor <semperfitaylor@sbcglobal.net>; Craig Chaffee <cjchaffee@comcast.net>; Tom Buford <TBuford@cityofsacramento.org>
Subject: RE: Input as resident in NWLP area where you are planning development.

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Community Development Department
Environmental Planning Services
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I am out of the office and will return Friday, August 3, 2018. If you need immediate assistance please contact Scott Johnson at srjohnson@cityofsacramento.org or phone at (916) 808-5842.

Thank You.

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My family has lived in the small surrounding fragile neighborhood since 1980.

I consulted a lawyer knowledgeable on CEQA/EIRs. The City and their consultants (partially hired because of their knowledge/experience on how to “fast track” CEQA/EIR reviews) should not try to use the ‘fair share affordable housing’ concept

to fast track the CEQA/EIR reviews in an area already plagued with a gross over-concentration of public housing (PH) . That is political and hypocritical. That is not a correct use of the fair share concept for fast tracking CEQA/EIR reviews. Community has right to legally dispute the PH overconcentration /resulting community problems for decades using CEQA; such CEQA reviews can and should include socioeconomic issues too.

Here's some main points for the City/consultants.

- My family and most neighbors support the principles of fair share affordable housing.
- However, City/consultants should not try to use the fair share affordable housing concept to fast track the CEQA/EIR review in an area already plagued with a gross over-concentration of PH. Instead the City/consultants should use the fair share principles and facts about the existing overconcentration of public housing in this one little area to support long term plans to spread PH and other affordable housing throughout City AND County, not to keep it over-concentrated in this one little area
- Related City Council Reports (e.g., April 3, 2018) on funding these consultants and working on this West Broadway/NWLP plan say “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.” The final plan must accomplish this equitable distribution of affordable housing throughout Sacramento, not over-concentrating it here.
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- The evidence is clear. Placing too much public housing in one little area results in major problems: Overconcentration of poverty, substance abuse and other mental health disorders, child neglect, crime, delinquency, poor education, unemployment and many others. It's warehousing those in need.

- Sacramento must develop and implement a vision and plan to spread and integrate effective public and other affordable housing throughout Sacramento using fair share principles. Please don't leave both of these two huge PH projects crammed in this one small Sacramento area.

Thank You. I appreciate my comments being recorded/ added to community input, and concerns addressed/mitigated.

From: [Craig Chaffee](#)
To: [Scott Johnson](#)
Cc: [Tom Buford](#); craig@eyeonsacramento.org; "Genevive Taylor"; Craig.Chaffee@dhcs.ca.gov
Subject: Please include all of the following emails/information in the formal written record of public comment on the West Broadway/NWLP planning efforts and EIR and CEQA work specifically.
Date: Wednesday, August 1, 2018 5:19:20 PM

Dear Mr. Johnson. City West Broadway/NWLP Area Planning team,

It is my understanding that public input on the "West Broadway/Northwest Land Park Plan project work related to the EIR and CEQA are still being accepted.

Please include/record this email and all its contents in the community/public input for this planning project and related EIR and CEQA work.

Please make sure to address and plan to mitigate the related issues in your EIR and CEQA work.

Please let me know if you have any questions/etc. My family and so many others in this community strive for a much safer community and environment free from such hazards to live in and raise our families. Thank You.

Again, I've been advised by a lawyer very knowledgeable in such law/subject matter that CEQA covers socioeconomic impacts; there is authority that they're covered. The following 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 4 of the Environmental Handbook](#), for example: <http://www.dot.ca.gov/ser/vol1/sec5/ch36eir/chap36.htm#required>

As state below to your office on July 25, 2018 (in email below):

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Thank you, again, for contacting our office. Mayor Steinberg appreciates hearing from you.

Sincerely,

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- Sacramento must develop and implement a vision and plan to spread and integrate effective public and other affordable housing throughout Sacramento using fair share principles. Please don't leave both of these two huge PH projects crammed in this one small Sacramento area.

Thank You. I appreciate my comments being recorded/ added to community input, and concerns addressed/mitigated.

From: [Genevive Taylor](#)
To: [Scott Johnson](#); [Craig Chaffee](#)
Cc: [Tom Buford](#); craig@eyeonsacramento.org; Craig.Chaffee@dhcs.ca.gov
Subject: Re: Please include all of the following emails/information in the formal written record of public comment on the West Broadway/NWLP planning efforts and EIR and CEQA work specifically.
Date: Thursday, August 2, 2018 8:19:11 AM

Good morning Craig, Scott,

Thank you for mentioning and including the noted Environmental considerations for this build. My biggest concerns are: The PH Expansion from 751 units to 1200/1500 units and the traffic that will be generated on Broadway and the surrounding communities, from: PH Expansion, The Mill Expansion, the NW Broadway Expansion, The Broadway Bridge to WS Expansion.

Myself, Craig Chaffee and many other LP, ULP residents and surrounding communities are the ones who have to deal with the results of this project. The Freeport Road Diet is a prime example of what was supposed to be a positive project, to a questionable project.

Thank you-

Art Taylor

LPCA

From: Scott Johnson <SRJohnson@cityofsacramento.org>
To: Craig Chaffee <cjchaffee@comcast.net>
Cc: Tom Buford <TBuford@cityofsacramento.org>; "craig@eyeonsacramento.org" <craig@eyeonsacramento.org>; 'Genevive Taylor' <semperfitaylor@sbcglobal.net>; "Craig.Chaffee@dhcs.ca.gov" <Craig.Chaffee@dhcs.ca.gov>
Sent: Thursday, August 2, 2018 7:50 AM
Subject: RE: Please include all of the following emails/information in the formal written record of public comment on the West Broadway/NWLP planning efforts and EIR and CEQA work specifically.

Dear Mr. Chaffee,

Thank you for your additional response to the Notice of Preparation (NOP) of an Environmental Impact Report for the West Broadway Specific Plan project. Your concerns will be included with responses and comments provided on the NOP to assist in the preparation of the draft environmental impact report.

Thank you again,

Scott Johnson
City of Sacramento
Community Development Department
Environmental Planning Services
300 Richards Blvd., 3rd Floor
Sacramento, CA 95811
(916) 808-5842
srjohnson@cityofsacramento.org

From: Craig Chaffee <cjchaffee@comcast.net>

Sent: Wednesday, August 1, 2018 5:19 PM

To: Scott Johnson <SRJohnson@cityofsacramento.org>

Cc: Tom Buford <TBuford@cityofsacramento.org>; craig@eyeonsacramento.org; 'Genevive Taylor' <semperfitaylor@sbcglobal.net>; Craig.Chaffee@dhcs.ca.gov

Subject: Please include all of the following emails/information in the formal written record of public comment on the West Broadway/NWLP planning efforts and EIR and CEQA work specifically.

Dear Mr. Johnson. City West Broadway/NWLP Area Planning team,

It is my understanding that public input on the “West Broadway/Northwest Land Park Plan project work related to the EIR and CEQA are still being accepted.

Please include/record this email and all its contents in the community/public input for this planning project and related EIR and CEQA work.

Please make sure to address and plan to mitigate the related issues in your EIR and CEQA work.

Please let me know if you have any questions/etc. My family and so many others in this community strive for a much safer community and environment free from such hazards to live in and raise our families. Thank You.

Again, I've been advised by a lawyer very knowledgeable in such law/subject matter that CEQA covers socioeconomic impacts; there is authority that they're covered. The following 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 4 of the Environmental Handbook](#), for example: <http://www.dot.ca.gov/ser/vol1/sec5/ch36eir/chap36.htm#required>

As state below to your office on July 25, 2018 (in email below):

- The State Office of Environmental Health Hazard Assessment (OEHHA) shows that this specific West Broadway/NWLP area of Sacramento is one of the most polluted areas and negatively impacted by socioeconomic challenges in the County AND State. The overconcentration of public housing in this area drives OEHHA's very troubling rankings of high poverty and unemployment, This little Sac area contains over 44% of all of SHRA's PH units in the ENTIRE City limits, one of the largest concentrations of PH anywhere in the Western United States.
- EACH of the 2 public housing projects in this area is, by far, the largest in the entire

Sacramento area. This unhealthy overconcentration is the result of the failed last century government policy of cramming too much public housing in one place – based on racism, NIMBY by more powerful neighborhoods accepting NONE/ZERO, and political expediency. And, right next door to these two huge PH projects, the City/SHRA converted a 75 unit apartment complex it promised the neighbors would always only be for seniors into all low-income all age units. The seniors left because the PH projects made it a dangerous area to live.

- For many decades the overconcentration in this one small Sacramento area has caused major problems for the project tenants, surrounding neighbors and taxpayers. This neighborhood became the most violent area in all of Sacramento in the early 90's.
- The evidence is clear. Placing too much public housing in one little area results in major problems: Overconcentration of poverty, substance abuse and other mental health disorders, child neglect, crime, delinquency, poor education, unemployment and many others. It's warehousing those in need.
- As reported the area around these two huge public housing projects crammed in this one little area of Sacramento has crime rates much higher than further away in the Land Park community. Using the online SACPD Lexus Nexis Community Crime Mapping analytics tool the types of crimes/events reported inside these housing projects were examined. In the last year there were over 330 reported in the ½ mile radius including both Alder Grove and Marina Vista (aka Seavey Circle). The following is a list of those, many listed often, reported inside these two public housing projects in the last year: Vandalism, Possible Financial Crime, Missing Person, Take Vehicle W/O Owner, Possession/ Sales Opiates/Narcotics, Harassment, Child Custody, DUI , Access Card Fraud, AWDW – Non Firearm, Felony Possession Ammo, Gang Activity, Robbery, Possession Stolen Vehicle, Assault W/ Caustic Chemicals, Petty Theft, Battery Civilian, Willful Disobedience, Danger to Self/Others, Resisting Peace Officer, Harassment, Inflicting Injury on Child, Casualty Report, Burglary Vehicle, Burglary Residence/Forced, Trespassing After Notice, Violated Protective Order, Found Property, Brandish –Non Gun, Child Assault/Sex Activity, Towed Stored Vehicle, Theft – License Plate, Auto Theft Location, Trespassing/Prowler, Domestic Violence, Robbery – Purse Snatch, US Theft of Mail, Forcibly Steal/Take, Brandish Firearm, Arson of Inhabited Structure, Hit/Run Injury, Shooting in Occupied Dwelling. SACPD and others (e.g., UC Davis Study for SHRA) report that many crimes go unreported in the public housing for fear of retaliation, so these crime/event statistics are conservative. The police can only really mop up/react to the underlying problem – the overconcentration of poverty/public housing in one little area of Sacramento that has caused a bad environment to live in, and major and costly problems.
- 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> Some quick takeaways: 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

public housing in any one area –overconcentration- creates communities with serious crime, health, education, and other major and costly problems that, in turn, further restrict the opportunities of those growing up and living in them. The impacts of neighborhood poverty rates on creating these problems increase rapidly if a neighborhood exceeds about 20 percent poverty.

Again, Sacramento must develop and implement a vision and plan to spread and integrate effective public and other affordable housing throughout Sacramento using fair share principles. Please don't leave both of these two huge PH projects crammed in this one small Sacramento area. Again, the overconcentration of public housing in this one little Sacramento area, and the resulting major and costly problems must be included in the EIR and CEQA . Alternatives must be developed to mitigate these major problems in this area/community.

As included in my July 25 written communication below, the Mayor of Sacramento says: “***It is unfair and ultimately unsuccessful to over concentrate any housing or social service effort in one or several neighborhoods.***”

The following is another assurance from the current Mayor that plans will be developed to evenly distribute public housing throughout Sacramento, not leave so much in the West Broadway, NWLP area. The decades of major and costly problems are well documented and agreed to by so many in public documentation. These facts must not be dismissed/overlooked.

From: MayorSacramento@mail.senecagov.com
[<mailto:MayorSacramento@mail.senecagov.com>]

Sent: Tuesday, January 23, 2018 3:38 PM

To: Craig Chaffee

Subject: Re: FW: Sent following letter to Bee editors to publish and posted on our Next Door site.

Luis Montes has responded:

Dear Craig Chaffee,

*Thank you for contacting Mayor Darrell Steinberg's Office. We appreciate your willingness to share your thoughts and concerns with our office and we have forwarded your comments to the appropriate City staff. **The mayor agrees, it is necessary to have even distribution of public housing in all eight districts throughout Sacramento and in 2018, the mayor's goal is to increase the capacity to create an environment that spurs the construction of more public and affordable housing throughout all of Sacramento.** If you have any additional questions or concerns on this topic please do not hesitate to ask.*

Thank you, again, for contacting our office. Mayor Steinberg appreciates hearing from you.

Sincerely,

Luis Montes
Director of Constituent Affairs
Office of Mayor Darrell Steinberg
LMontes@cityofsacramento.org

From: Chaffee, Craig (MHSD-FMOR)@DHCS
Sent: Wednesday, July 25, 2018 12:33 PM
To: 'Scott Johnson' <SRJohnson@cityofsacramento.org>
Cc: Genevive Taylor <semperfitaylor@sbcglobal.net>; Craig Chaffee <cjchaffee@comcast.net>; Tom Buford <TBuford@cityofsacramento.org>
Subject: RE: Input as resident in NWLP area where you are planning development.

Dear Mr. Johnson,

Thank you for your responsiveness. Since 1980 when my wife and I moved to the little neighborhood ("Upper Land Park) with the 2 huge failed past century government projects (e.g., Seavey Circle and Alder Grove) we have been assured many times by government officials (e.g. past SHRA Director) that they understood that concentrating so much poverty and public housing in one little area (warehousing) was a failed government practice, and that at least half of the existing public housing units crammed in this one tiny little Sac area must be moved/integrated into other Sac areas using fair share principles. Yet, push comes to shove and NIMBY, the 2 huge projects have been left here by government, with all the major and costly problems – decade after decade. Below is a direct communication from the Mayor's Office on the issue. Must hard working tax paying homeowners all leave –seek higher safer ground? Will the City ever actually make good on their promises, or just build more of the same here, put more lipstick on the pig, and give it some fancy new name (e.g., Seavey Estates)? Again thank you for anything you can do to help affect real positive change for this very fragile community you now called North West Land Park.

Hi Craig,

Thanks for writing to the Mayor about the concern a of overconcentration of public housing in Upper Land Park.

I understand what I say does not carry the weight of what Darrell says or what I may communicate his position to be. To that end, here are Darrell's thoughts on the issue from him personally:

"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."

Warm regards,

Kelly F. Rivas
Campaign Manager

From: Scott Johnson <SRJohnson@cityofsacramento.org>
Sent: Wednesday, July 25, 2018 12:11 PM
To: Chaffee, Craig (MHSD-FMOR)@DHCS <Craig.Chaffee@dhcs.ca.gov>
Cc: Genevive Taylor <semperfitaylor@sbcglobal.net>; Craig Chaffee <cjchaffee@comcast.net>; Tom Buford <TBuford@cityofsacramento.org>
Subject: RE: Input as resident in NWLP area where you are planning development.

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Thank you,

Scott Johnson
City of Sacramento
Community Development Department
Environmental Planning Services
300 Richards Blvd., 3rd Floor
Sacramento, CA 95811
(916) 808-5842
srjohnson@cityofsacramento.org

From: Chaffee, Craig (MHSD-FMOR)@DHCS <Craig.Chaffee@dhcs.ca.gov>
Sent: Wednesday, July 25, 2018 12:01 PM
To: Scott Johnson <SRJohnson@cityofsacramento.org>
Cc: Genevive Taylor <semperfitaylor@sbcglobal.net>; Craig Chaffee <cjchaffee@comcast.net>
Subject: FW: Input as resident in NWLP area where you are planning development.

Dear Mr. Johnson,

I got the following email reply from Mr. Buford forwarding to you to make sure this was received "on time" for any community input deadline on this matter.

I am out of the office and will return Friday, August 3, 2018. If you need immediate assistance

please contact Scott Johnson at srjohnson@cityofsacramento.org or phone at (916) 808-5842.

Thank You.

From: Chaffee, Craig (MHSD-FMOR)@DHCS
Sent: Wednesday, July 25, 2018 11:48 AM
To: 'tbuford@cityofsacramento.org' <tbuford@cityofsacramento.org>
Cc: 'Helen Selph' <HSelph@cityofsacramento.org>; 'Greg Sandlund' <GSandlund@cityofsacramento.org>; 'Genevive Taylor' <semperfitaylor@sbcglobal.net>; 'Craig Chaffee' <cjchaffee@comcast.net>
Subject: Input as resident in NWLP area where you are planning development.

Dear Mr. Buford,

I was planning on attending the City/consultant meeting tonight on West Broadway/NWLP planning. But as a still working senior citizen (and grandparent) I'm not sure I'll brave the heat, and attend in person. So I'm offering some input here as a LONG TERM resident of the area. I've communicated numerous times with Helen Selph too. I find her responsive and informative. Most appreciated! She can likely share previous communications. Below I try to focus on CEQA/EIR related concerns. I've included Art Taylor – Board Member on our Land Park Community Association. Mr. Taylor has been very involved in the public housing issues for a long time.

Helen Selph communicated to me about possible CEQA ‘Streamlining’ on this project: “Detailed evaluation of potential residential and mixed use projects proposed under the Northwest Land Park Specific Plan will expedite the approval process for future projects that are consistent with the Northwest Land Park Specific Plan. Depending on the characteristics of future projects, streamlining under the Northwest Land Park Specific Plan EIR may range from a complete exemption to preparation of a focused, project-specific environmental document. (Please note that due to Federal funding requirements, any re-development of Marina Vista and Alder Grove public housing properties will require additional environmental review, including NEPA).”

My family has lived in the small surrounding fragile neighborhood since 1980.

I consulted a lawyer knowledgeable on CEQA/EIRs. The City and their consultants (partially hired because of their knowledge/experience on how to “fast track” CEQA/EIR reviews) should not try to use the ‘fair share affordable housing’ concept to fast track the CEQA/EIR reviews in an area already plagued with a gross over-concentration of public housing (PH) . That is political and hypocritical. That is not a correct use of the fair share concept for fast tracking CEQA/EIR reviews. Community has right to legally dispute the PH overconcentration /resulting community problems for decades using CEQA; such CEQA reviews can and should include socioeconomic issues too.

Here’s some main points for the City/consultants.

- My family and most neighbors support the principles of fair share affordable housing.

- However, City/consultants should not try to use the fair share affordable housing concept to fast track the CEQA/EIR review in an area already plagued with a gross over-concentration of PH. Instead the City/consultants should use the fair share principles and facts about the existing overconcentration of public housing in this one little area to support long term plans to spread PH and other affordable housing throughout City AND County, not to keep it over-concentrated in this one little area
- Related City Council Reports (e.g., April 3, 2018) on funding these consultants and working on this West Broadway/NWLP plan say “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.” The final plan must accomplish this equitable distribution of affordable housing throughout Sacramento, not over-concentrating it here.
- The State Office of Environmental Health Hazard Assessment (OEHHA) shows that this specific West Broadway/NWLP area of Sacramento is one of the most polluted areas and negatively impacted by socioeconomic challenges in the County AND State. The overconcentration of public housing in this area drives OEHHA’s very troubling rankings of high poverty and unemployment, This little Sac area contains over 44% of all of SHRA’s PH units in the ENTIRE City limits, one of the largest concentrations of PH anywhere in the Western United States.
- EACH of the 2 PH projects is, by far, the largest in the entire Sacramento area. This unhealthy overconcentration is the result of the failed last century government policy of cramming too much public housing in one place – based on racism, NIMBY by more powerful neighborhoods accepting NONE/ZERO, and political expediency. And, right next door to these two huge PH projects, the City/SHRA converted a 75 unit apartment complex it promised the neighbors would always only be for seniors into all low-income all age units. The seniors left because the PH projects made it a dangerous area to live.
- For many decades the overconcentration in this one small Sacramento area has caused major problems for the project tenants, surrounding neighbors and taxpayers. This neighborhood became the most violent area in all of Sacramento in the early 90’s.
- The evidence is clear. Placing too much public housing in one little area results in major problems: Overconcentration of poverty, substance abuse and other mental health disorders, child neglect, crime, delinquency, poor education, unemployment and many others. It’s warehousing those in need.
- Sacramento must develop and implement a vision and plan to spread and integrate effective public and other affordable housing throughout Sacramento using fair share principles. Please don’t leave both of these two huge PH projects crammed in this one small Sacramento area.

Thank You. I appreciate my comments being recorded/ added to community input, and concerns addressed/mitigated.

From: [Chaffee, Craig \(MHSD-FMOR\)@DHCS](mailto:Chaffee, Craig (MHSD-FMOR)@DHCS)
To: Scott Johnson
Cc: Tom Buford; craig@eyeonsacramento.org; "Genevive Taylor"; Craig Chaffee
Subject: RE: Please include all of the following emails/information in the formal written record of public comment on the West Broadway/NWLP planning efforts and EIR and CEQA work specifically.
Date: Thursday, August 2, 2018 9:32:08 AM

Thank you again Mr. Johnson,

I thought you and your team might also be interested in the following email "string" and related article in the Sacramento Bee.

From: Chaffee, Craig (MHSD-FMOR)@DHCS
Sent: Thursday, March 8, 2018 12:39 PM
To: MayorSteinberg@cityofsacramento.org; shansen@cityofsacramento.org
Cc: 'Genevive Taylor' <semperfitaylor@sbcglobal.net>; Craig Chaffee <cjchaffee@comcast.net>
Subject: JUST FYI: RE: Thank You. Read your great, informative article today in the local Sacramento Bee newspaper.

Sent email below to author of the following Bee article author today.

[CEQA isnt stopping affordable housing in California, it's protecting ...
www.sacbee.com/opinion/op-ed/soapbox/article203907234.html](http://www.sacbee.com/opinion/op-ed/soapbox/article203907234.html)

1 day ago - Developers point a finger at the California Environmental Quality Act as a key obstacle to building more **housing**. But today's streamlined **CEQA** protects **public** health and natural resources while giving voice to disadvantaged communities. ... **CEQA isn't stopping housing**, it's protecting health. By Allen ...

From: Chaffee, Craig (MHSD-FMOR)@DHCS
Sent: Thursday, March 8, 2018 12:29 PM
To: 'Allen.H@CCAEEJ.org' <Allen.H@CCAEEJ.org>
Cc: Craig Chaffee <cjchaffee@comcast.net>
Subject: Thank You. Read your great, informative article today in the local Sacramento Bee newspaper.

“CEQA isn’t stopping affordable housing” – Great work. Thank you.

My wife and I live in a little neighborhood in Sacramento CA. Many decades ago the City allowed over 44% of all public housing units in the City limits to be crammed in this one little neighborhood. This overconcentration of public housing in one little area is based on old failed past century practices, racism, NIMBY by the more powerful and affluent neighborhoods in Sacramento, developer greed and political expediency. Like you say in your article, falsehoods are substituted for

facts. Most of these old dilapidated public housing units in Sacramento CA are also crammed right next to the I-5 Freeway. The area has some of the highest environmental risk/pollution scores in California. Now the City is seriously considering not only rebuilding all that public housing there, but doubling it on the same land. It doesn't take a rocket scientist to tell you that such concentrated poverty, and next to a major California freeway, is unhealthy and harmful for that community and all those children. Neighbors try to convince the government and developers to spread such needed public housing out throughout Sacramento in a number of good neighborhoods with healthy environments using fair share principles, with not too much in any one neighborhood, but far more overall. Instead is the City government working with developers to "streamline" the public review process (including CEQA issues) and fast track their new public housing development all crammed in this one area, doubled and left by the freeway pollution? There is also a petroleum refinery very nearby. Yet will the City move forward to "streamline" community input and review for development plans? Certainly fits with the facts and bad practices you communicate in your great article. Thank you for your important work and writings. We're hoping that Sacramento and other leaders in California and our nation will read and learn from great communication like yours. Best to you and your family.

Craig Chaffee
Sacramento, CA

From: Scott Johnson <SRJohnson@cityofsacramento.org>

Sent: Thursday, August 2, 2018 7:51 AM

To: Craig Chaffee <cjchaffee@comcast.net>

Cc: Tom Buford <TBuford@cityofsacramento.org>; craig@eyeonsacramento.org; 'Genevive Taylor' <semperfitaylor@sbcglobal.net>; Chaffee, Craig (MHSD-FMOR)@DHCS <Craig.Chaffee@dhcs.ca.gov>

Subject: RE: Please include all of the following emails/information in the formal written record of public comment on the West Broadway/NWLP planning efforts and EIR and CEQA work specifically.

Dear Mr. Chaffee,

Thank you for your additional response to the Notice of Preparation (NOP) of an Environmental Impact Report for the West Broadway Specific Plan project. Your concerns will be included with

responses and comments provided on the NOP to assist in the preparation of the draft environmental impact report.

Thank you again,

Scott Johnson
City of Sacramento
Community Development Department
Environmental Planning Services
300 Richards Blvd., 3rd Floor
Sacramento, CA 95811
(916) 808-5842
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Sent: Wednesday, August 1, 2018 5:19 PM

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Cc: Tom Buford <TBuford@cityofsacramento.org>; craig@eyeonsacramento.org; 'Genevive Taylor' <semperfitaylor@sbcglobal.net>; Craig.Chaffee@dhcs.ca.gov

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Please include/record this email and all its contents in the community/public input for this planning project and related EIR and CEQA work.

Please make sure to address and plan to mitigate the related issues in your EIR and CEQA work.

Please let me know if you have any questions/etc. My family and so many others in this community strive for a much safer community and environment free from such hazards to live in and raise our families. Thank You.

Again, I've been advised by a lawyer very knowledgeable in such law/subject matter that CEQA covers socioeconomic impacts; there is authority that they're covered. The following is from the CalTrans Handbook:

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As state below to your office on July 25, 2018 (in email below):

- The State Office of Environmental Health Hazard Assessment (OEHHA) shows that this specific West Broadway/NWLP area of Sacramento is one of the most polluted areas and negatively impacted by socioeconomic challenges in the County AND State. The overconcentration of public housing in this area drives OEHHA's very troubling rankings of high poverty and unemployment. This little Sac area contains over 44% of all of SHRA's PH units in the ENTIRE City limits, one of the largest concentrations of PH anywhere in the Western United States.
- EACH of the 2 public housing projects in this area is, by far, the largest in the entire Sacramento area. This unhealthy overconcentration is the result of the failed last century government policy of cramming too much public housing in one place – based on racism, NIMBY by more powerful neighborhoods accepting NONE/ZERO, and political expediency. And, right next door to these two huge PH projects, the City/SHRA converted a 75 unit apartment complex it promised the neighbors would always only be for seniors into all low-income all age units. The seniors left because the PH projects made it a dangerous area to live.
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Financial Crime, Missing Person, Take Vehicle W/O Owner, Possession/ Sales Opiates/Narcotics, Harassment, Child Custody, DUI , Access Card Fraud, AWDW – Non Firearm, Felony Possession Ammo, Gang Activity, Robbery, Possession Stolen Vehicle, Assault W/ Caustic Chemicals, Petty Theft, Battery Civilian, Willful Disobedience, Danger to Self/Others, Resisting Peace Officer, Harassment, Inflicting Injury on Child, Casualty Report, Burglary Vehicle, Burglary Residence/Forced, Trespassing After Notice, Violated Protective Order, Found Property, Brandish –Non Gun, Child Assault/Sex Activity, Towed Stored Vehicle, Theft – License Plate, Auto Theft Location, Trespassing/Prowler, Domestic Violence, Robbery – Purse Snatch, US Theft of Mail, Forcibly Steal/Take, Brandish Firearm, Arson of Inhabited Structure, Hit/Run Injury, Shooting in Occupied Dwelling. SACPD and others (e.g., UC Davis Study for SHRA) report that many crimes go unreported in the public housing for fear of retaliation, so these crime/event statistics are conservative. The police can only really mop up/react to the underlying problem – the overconcentration of poverty/public housing in one little area of Sacramento that has caused a bad environment to live in, and major and costly problems.

- 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> Some quick takeaways: 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 public housing in any one area –overconcentration-creates communities with serious crime, health, education, and other major and costly problems that, in turn, further restrict the opportunities of those growing up and living in them. The impacts of neighborhood poverty rates on creating these problems increase rapidly if a neighborhood exceeds about 20 percent poverty.

Again, Sacramento must develop and implement a vision and plan to spread and integrate effective public and other affordable housing throughout Sacramento using fair share principles. Please don’t leave both of these two huge PH projects crammed in this one small Sacramento area. Again, the overconcentration of public housing in this one little Sacramento area, and the resulting major and costly problems must be included in the EIR and CEQA . Alternatives must be developed to mitigate these major problems in this area/community.

As included in my July 25 written communication below, the Mayor of Sacramento says: **“It is unfair and ultimately unsuccessful to over concentrate any housing or social service effort in one or several neighborhoods.”**

The following is another assurance from the current Mayor that plans will be developed to evenly distribute public housing throughout Sacramento, not leave so much in the West Broadway, NWLP area. The decades of major and costly problems are well documented and agreed to by so many in public documentation.

These facts must not be dismissed/overlooked.

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[<mailto:MayorSacramento@mail.senecagov.com>]

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To: Craig Chaffee

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Luis Montes has responded:

Dear Craig Chaffee,

*Thank you for contacting Mayor Darrell Steinberg's Office. We appreciate your willingness to share your thoughts and concerns with our office and we have forwarded your comments to the appropriate City staff. **The mayor agrees, it is necessary to have even distribution of public housing in all eight districts throughout Sacramento and in 2018, the mayor's goal is to increase the capacity to create an environment that spurs the construction of more public and affordable housing throughout all of Sacramento.** If you have any additional questions or concerns on this topic please do not hesitate to ask.*

Thank you, again, for contacting our office. Mayor Steinberg appreciates hearing from you.

Sincerely,

Luis Montes

Director of Constituent Affairs

Office of Mayor Darrell Steinberg

LMontes@cityofsacramento.org

From: Chaffee, Craig (MHSD-FMOR)@DHCS

Sent: Wednesday, July 25, 2018 12:33 PM

To: 'Scott Johnson' <SRJohnson@cityofsacramento.org>

Cc: Genevive Taylor <semperfitaylor@sbcglobal.net>; Craig Chaffee <cjchaffee@comcast.net>; Tom Buford <TBuford@cityofsacramento.org>
Subject: RE: Input as resident in NWLP area where you are planning development.

Dear Mr. Johnson,

Thank you for your responsiveness. Since 1980 when my wife and I moved to the little neighborhood ("Upper Land Park) with the 2 huge failed past century government projects (e.g., Seavey Circle and Alder Grove) we have been assured many times by government officials (e.g. past SHRA Director) that they understood that concentrating so much poverty and public housing in one little area (warehousing) was a failed government practice, and that at least half of the existing public housing units crammed in this one tiny little Sac area must be moved/integrated into other Sac areas using fair share principles. Yet, push comes to shove and NIMBY, the 2 huge projects have been left here by government , with all the major and costly problems – decade after decade. Below is a direct communication from the Mayor's Office on the issue. Must hard working tax paying homeowners all leave –seek higher safer ground? Will the City ever actually make good on their promises, or just build more of the same here, put more lipstick on the pig, and give it some fancy new name (e.g., Seavey Estates)? Again thank you for anything you can do to help affect real positive change for this very fragile community you now called North West Land Park.

Hi Craig,

Thanks for writing to the Mayor about the concern a of overconcentration of public housing in Upper Land Park.

I understand what I say does not carry the weight of what Darrell says or what I may communicate his position to be. To that end, here are Darrell's thoughts on the issue from him personally:

"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."

Warm regards,

**Kelly F. Rivas
Campaign Manager**

From: Scott Johnson <SRJohnson@cityofsacramento.org>
Sent: Wednesday, July 25, 2018 12:11 PM
To: Chaffee, Craig (MHSD-FMOR)@DHCS <Craig.Chaffee@dhcs.ca.gov>
Cc: Genevive Taylor <semperfitaylor@sbcglobal.net>; Craig Chaffee <cjchaffee@comcast.net>; Tom Buford <TBuford@cityofsacramento.org>
Subject: RE: Input as resident in NWLP area where you are planning development.

Dear Mr. Chaffee,

Thank you for your response to the Notice of Preparation (NOP) of an Environmental Impact Report for the West Broadway Specific Plan project. Your concerns will be included with responses and comments provided on the NOP to assist in the preparation of the draft environmental impact report.

Thank you,

Scott Johnson
City of Sacramento
Community Development Department
Environmental Planning Services
300 Richards Blvd., 3rd Floor
Sacramento, CA 95811
(916) 808-5842
srjohnson@cityofsacramento.org

From: Chaffee, Craig (MHSD-FMOR)@DHCS <Craig.Chaffee@dhcs.ca.gov>
Sent: Wednesday, July 25, 2018 12:01 PM
To: Scott Johnson <SRJohnson@cityofsacramento.org>
Cc: Genevive Taylor <semperfitaylor@sbcglobal.net>; Craig Chaffee <cjchaffee@comcast.net>
Subject: FW: Input as resident in NWLP area where you are planning development.

Dear Mr. Johnson,

I got the following email reply from Mr. Buford forwarding to you to make sure this was received "on time" for any community input deadline on this matter.

I am out of the office and will return Friday, August 3, 2018. If you need immediate assistance please contact Scott Johnson at srjohnson@cityofsacramento.org or phone at (916) 808-5842.

Thank You.

From: Chaffee, Craig (MHSD-FMOR)@DHCS
Sent: Wednesday, July 25, 2018 11:48 AM
To: 'tbuford@cityofsacramento.org' <tbuford@cityofsacramento.org>
Cc: 'Helen Selph' <HSelph@cityofsacramento.org>; 'Greg Sandlund' <GSandlund@cityofsacramento.org>; 'Genevive Taylor' <semperfitaylor@sbcglobal.net>; 'Craig Chaffee' <cjchaffee@comcast.net>
Subject: Input as resident in NWLP area where you are planning development.

Dear Mr. Buford,

I was planning on attending the City/consultant meeting tonight on West Broadway/NWLP planning. But as a still working senior citizen (and grandparent) I'm not sure I'll brave the heat, and attend in person. So I'm offering some input here as a LONG TERM resident of the area. I've communicated numerous times with Helen Selph too. I find her responsive and informative. Most appreciated! She can likely share previous communications. Below I try to focus on CEQA/EIR related concerns. I've included Art Taylor – Board Member on our Land Park Community Association. Mr. Taylor has been very involved in the public housing issues for a long time.

Helen Selph communicated to me about possible CEQA 'Streamlining' on this project: "Detailed evaluation of potential residential and mixed use projects proposed under the Northwest Land Park Specific Plan will expedite the approval process for future projects that are consistent with the Northwest Land Park Specific Plan. Depending on the characteristics of future projects, streamlining under the Northwest Land Park Specific Plan EIR may range from a complete exemption to preparation of a focused, project-specific environmental document. (Please note that due to Federal funding requirements, any re-development of Marina Vista and Alder Grove public housing properties will require additional environmental review, including NEPA)."

My family has lived in the small surrounding fragile neighborhood since 1980.

I consulted a lawyer knowledgeable on CEQA/EIRs. The City and their consultants (partially hired because of their knowledge/experience on how to "fast track" CEQA/EIR reviews) should not try to use the 'fair share affordable housing' concept to fast track the CEQA/EIR reviews in an area already plagued with a gross over-concentration of public housing (PH). That is political and hypocritical. That is not a correct use of the fair share concept for fast tracking CEQA/EIR reviews. Community has right to legally dispute the PH overconcentration /resulting community problems for decades using CEQA; such CEQA reviews can and should include socioeconomic issues too.

Here's some main points for the City/consultants.

- My family and most neighbors support the principles of fair share affordable

housing.

- However, City/consultants should not try to use the fair share affordable housing concept to fast track the CEQA/EIR review in an area already plagued with a gross over-concentration of PH. Instead the City/consultants should use the fair share principles and facts about the existing overconcentration of public housing in this one little area to support long term plans to spread PH and other affordable housing throughout City AND County, not to keep it over-concentrated in this one little area
- Related City Council Reports (e.g., April 3, 2018) on funding these consultants and working on this West Broadway/NWLP plan say “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.” The final plan must accomplish this equitable distribution of affordable housing throughout Sacramento, not over-concentrating it here.
- The State Office of Environmental Health Hazard Assessment (OEHHA) shows that this specific West Broadway/NWLP area of Sacramento is one of the most polluted areas and negatively impacted by socioeconomic challenges in the County AND State. The overconcentration of public housing in this area drives OEHHA’s very troubling rankings of high poverty and unemployment, This little Sac area contains over 44% of all of SHRA’s PH units in the ENTIRE City limits, one of the largest concentrations of PH anywhere in the Western United States.
- EACH of the 2 PH projects is, by far, the largest in the entire Sacramento area. This unhealthy overconcentration is the result of the failed last century government policy of cramming too much public housing in one place – based on racism, NIMBY by more powerful neighborhoods accepting NONE/ZERO, and political expediency. And, right next door to these two huge PH projects, the City/SHRA converted a 75 unit apartment complex it promised the neighbors would always only be for seniors into all low-income all age units. The seniors left because the PH projects made it a dangerous area to live.
- For many decades the overconcentration in this one small Sacramento area has caused major problems for the project tenants, surrounding neighbors and taxpayers. This neighborhood became the most violent area in all of Sacramento in the early 90’s.
- The evidence is clear. Placing too much public housing in one little area results in major problems: Overconcentration of poverty, substance abuse and other mental health disorders, child neglect, crime, delinquency, poor education, unemployment and many others. It’s warehousing those in need.
- Sacramento must develop and implement a vision and plan to spread and integrate effective public and other affordable housing throughout Sacramento using fair share principles. Please don’t leave both of these two huge PH projects crammed in this one small Sacramento area.

Thank You. I appreciate my comments being recorded/ added to community input, and concerns addressed/mitigated.

From: [Chaffee, Craig \(MHSD-FMOR\)@DHCS](mailto:Chaffee,Craig(MHSD-FMOR)@DHCS)
To: [Scott Johnson](mailto:Scott.Johnson)
Cc: [Tom Buford](mailto:Tom.Buford); craig@eyeonsacramento.org; "Genevive Taylor"; [Craig Chaffee](mailto:Craig.Chaffee)
Subject: RE: Please include all of the following emails/information in the formal written record of public comment on the West Broadway/NWLP planning efforts and EIR and CEQA work specifically.
Date: Thursday, August 2, 2018 8:16:39 AM

Thank you Scott. You and your team's help is most appreciated.

From: Scott Johnson <SRJohnson@cityofsacramento.org>
Sent: Thursday, August 2, 2018 7:51 AM
To: Craig Chaffee <cjchaffee@comcast.net>
Cc: Tom Buford <TBuford@cityofsacramento.org>; craig@eyeonsacramento.org; 'Genevive Taylor' <semperfitaylor@sbcglobal.net>; Chaffee, Craig (MHSD-FMOR)@DHCS <Craig.Chaffee@dhcs.ca.gov>
Subject: RE: Please include all of the following emails/information in the formal written record of public comment on the West Broadway/NWLP planning efforts and EIR and CEQA work specifically.

Dear Mr. Chaffee,

Thank you for your additional response to the Notice of Preparation (NOP) of an Environmental Impact Report for the West Broadway Specific Plan project. Your concerns will be included with responses and comments provided on the NOP to assist in the preparation of the draft environmental impact report.

Thank you again,

Scott Johnson
City of Sacramento
Community Development Department
Environmental Planning Services
300 Richards Blvd., 3rd Floor
Sacramento, CA 95811
(916) 808-5842
srjohnson@cityofsacramento.org

From: Craig Chaffee <cjchaffee@comcast.net>
Sent: Wednesday, August 1, 2018 5:19 PM
To: Scott Johnson <SRJohnson@cityofsacramento.org>
Cc: Tom Buford <TBuford@cityofsacramento.org>; craig@eyeonsacramento.org; 'Genevive Taylor' <semperfitaylor@sbcglobal.net>; Craig.Chaffee@dhcs.ca.gov
Subject: Please include all of the following emails/information in the formal written record of public comment on the West Broadway/NWLP planning efforts and EIR and CEQA work specifically.

Dear Mr. Johnson. City West Broadway/NWLP Area Planning team,

It is my understanding that public input on the “West Broadway/Northwest Land Park Plan project work related to the EIR and CEQA are still being accepted.

Please include/record this email and all its contents in the community/public input for this planning project and related EIR and CEQA work.

Please make sure to address and plan to mitigate the related issues in your EIR and CEQA work.

Please let me know if you have any questions/etc. My family and so many others in this community strive for a much safer community and environment free from such hazards to live in and raise our families. Thank You.

Again, I've been advised by a lawyer very knowledgeable in such law/subject matter that CEQA covers socioeconomic impacts; there is authority that they're covered. The following 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 4 of the Environmental Handbook](http://www.dot.ca.gov/ser/vol1/sec5/ch36eir/chap36.htm#required), for example: <http://www.dot.ca.gov/ser/vol1/sec5/ch36eir/chap36.htm#required>

As state below to your office on July 25, 2018 (in email below):

- The State Office of Environmental Health Hazard Assessment (OEHHA) shows that this specific West Broadway/NWLP area of Sacramento is one of the most polluted areas and negatively impacted by socioeconomic challenges in the County AND State. The overconcentration of public housing in this area drives OEHHA's very troubling rankings of high poverty and unemployment. This little Sac area contains over 44% of all of SHRA's PH units in the ENTIRE City limits, one of the largest concentrations of PH anywhere in the Western United States.
- EACH of the 2 public housing projects in this area is, by far, the largest in the entire Sacramento area. This unhealthy overconcentration is the result of the failed last century government policy of cramming too much public housing in one place – based on racism, NIMBY by more powerful neighborhoods accepting NONE/ZERO, and political expediency. And, right next door to these two huge PH projects, the City/SHRA converted a 75 unit apartment complex it

promised the neighbors would always only be for seniors into all low-income all age units. The seniors left because the PH projects made it a dangerous area to live.

- For many decades the overconcentration in this one small Sacramento area has caused major problems for the project tenants, surrounding neighbors and taxpayers. This neighborhood became the most violent area in all of Sacramento in the early 90's.
- The evidence is clear. Placing too much public housing in one little area results in major problems: Overconcentration of poverty, substance abuse and other mental health disorders, child neglect, crime, delinquency, poor education, unemployment and many others. It's warehousing those in need.
- As reported the area around these two huge public housing projects crammed in this one little area of Sacramento has crime rates much higher than further away in the Land Park community. Using the online SACPD Lexus Nexis Community Crime Mapping analytics tool the types of crimes/events reported inside these housing projects were examined. In the last year there were over 330 reported in the ½ mile radius including both Alder Grove and Marina Vista (aka Seavey Circle). The following is a list of those, many listed often, reported inside these two public housing projects in the last year: Vandalism, Possible Financial Crime, Missing Person, Take Vehicle W/O Owner, Possession/ Sales Opiates/Narcotics, Harassment, Child Custody, DUI, Access Card Fraud, AWDW – Non Firearm, Felony Possession Ammo, Gang Activity, Robbery, Possession Stolen Vehicle, Assault W/ Caustic Chemicals, Petty Theft, Battery Civilian, Willful Disobedience, Danger to Self/Others, Resisting Peace Officer, Harassment, Inflicting Injury on Child, Casualty Report, Burglary Vehicle, Burglary Residence/Forced, Trespassing After Notice, Violated Protective Order, Found Property, Brandish –Non Gun, Child Assault/Sex Activity, Towed Stored Vehicle, Theft – License Plate, Auto Theft Location, Trespassing/Prowler, Domestic Violence, Robbery – Purse Snatch, US Theft of Mail, Forcibly Steal/Take, Brandish Firearm, Arson of Inhabited Structure, Hit/Run Injury, Shooting in Occupied Dwelling. SACPD and others (e.g., UC Davis Study for SHRA) report that many crimes go unreported in the public housing for fear of retaliation, so these crime/event statistics are conservative. The police can only really mop up/react to the underlying problem – the overconcentration of poverty/public housing in one little area of Sacramento that has caused a bad environment to live in, and major and costly problems.
- 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> Some quick takeaways: 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 public housing in any one area –overconcentration-

creates communities with serious crime, health, education, and other major and costly problems that, in turn, further restrict the opportunities of those growing up and living in them. The impacts of neighborhood poverty rates on creating these problems increase rapidly if a neighborhood exceeds about 20 percent poverty.

Again, Sacramento must develop and implement a vision and plan to spread and integrate effective public and other affordable housing throughout Sacramento using fair share principles. Please don't leave both of these two huge PH projects crammed in this one small Sacramento area. Again, the overconcentration of public housing in this one little Sacramento area, and the resulting major and costly problems must be included in the EIR and CEQA . Alternatives must be developed to mitigate these major problems in this area/community.

As included in my July 25 written communication below, the Mayor of Sacramento says: "***It is unfair and ultimately unsuccessful to over concentrate any housing or social service effort in one or several neighborhoods.***"

The following is another assurance from the current Mayor that plans will be developed to evenly distribute public housing throughout Sacramento, not leave so much in the West Broadway, NWLP area. The decades of major and costly problems are well documented and agreed to by so many in public documentation. These facts must not be dismissed/overlooked.

From: MayorSacramento@mail.senecagov.com
[<mailto:MayorSacramento@mail.senecagov.com>]

Sent: Tuesday, January 23, 2018 3:38 PM

To: Craig Chaffee

Subject: Re: FW: Sent following letter to Bee editors to publish and posted on our Next Door site.

Luis Montes has responded:

Dear Craig Chaffee,

*Thank you for contacting Mayor Darrell Steinberg's Office. We appreciate your willingness to share your thoughts and concerns with our office and we have forwarded your comments to the appropriate City staff. **The mayor agrees, it is necessary to have even distribution of public housing in all eight districts throughout Sacramento and in 2018, the mayor's goal is to increase the capacity to create an environment that spurs the construction of more public and affordable housing throughout all of Sacramento.** If you have any additional questions or concerns on this topic please do not hesitate to ask.*

Thank you, again, for contacting our office. Mayor Steinberg appreciates hearing from you.

Sincerely,

Luis Montes

Director of Constituent Affairs

Office of Mayor Darrell Steinberg

LMontes@cityofsacramento.org

From: Chaffee, Craig (MHSD-FMOR)@DHCS

Sent: Wednesday, July 25, 2018 12:33 PM

To: 'Scott Johnson' <SRJohnson@cityofsacramento.org>

Cc: Genevive Taylor <semperfitaylor@sbcglobal.net>; Craig Chaffee <cjchaffee@comcast.net>; Tom Buford <TBuford@cityofsacramento.org>

Subject: RE: Input as resident in NWLP area where you are planning development.

Dear Mr. Johnson,

Thank you for your responsiveness. Since 1980 when my wife and I moved to the little neighborhood ("Upper Land Park) with the 2 huge failed past century government projects (e.g., Seavey Circle and Alder Grove) we have been assured many times by government officials (e.g. past SHRA Director) that they understood that concentrating so much poverty and public housing in one little area (warehousing) was a failed government practice, and that at least half of the existing public housing units crammed in this one tiny little Sac area must be moved/integrated into other Sac areas using fair share principles. Yet, push comes to shove and NIMBY, the 2 huge projects have been left here by government , with all the major and costly problems – decade after decade. Below is a direct communication from the Mayor's Office on the issue. Must hard working tax paying homeowners all leave –seek higher safer ground? Will the City ever actually make good on their promises, or just build more of the same here, put more lipstick on the pig, and give it some fancy new name (e.g., Seavey Estates)? Again thank you for anything you can do to help affect real positive change for this very fragile community you now called North West Land Park.

Hi Craig,

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"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."

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Campaign Manager**

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Thank you,

Scott Johnson
City of Sacramento
Community Development Department
Environmental Planning Services
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Subject: FW: Input as resident in NWLP area where you are planning development.

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Thank You.

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Cc: 'Helen Selph' <HSelph@cityofsacramento.org>; 'Greg Sandlund' <GSandlund@cityofsacramento.org>; 'Genevive Taylor' <semperfitaylor@sbcglobal.net>; 'Craig Chaffee' <cjchaffee@comcast.net>
Subject: Input as resident in NWLP area where you are planning development.

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Plan. Depending on the characteristics of future projects, streamlining under the Northwest Land Park Specific Plan EIR may range from a complete exemption to preparation of a focused, project-specific environmental document. (Please note that due to Federal funding requirements, any re-development of Marina Vista and Alder Grove public housing properties will require additional environmental review, including NEPA).”

My family has lived in the small surrounding fragile neighborhood since 1980.

I consulted a lawyer knowledgeable on CEQA/EIRs. The City and their consultants (partially hired because of their knowledge/experience on how to “fast track” CEQA/EIR reviews) should not try to use the ‘fair share affordable housing’ concept to fast track the CEQA/EIR reviews in an area already plagued with a gross over-concentration of public housing (PH) . That is political and hypocritical. That is not a correct use of the fair share concept for fast tracking CEQA/EIR reviews. Community has right to legally dispute the PH overconcentration /resulting community problems for decades using CEQA; such CEQA reviews can and should include socioeconomic issues too.

Here’s some main points for the City/consultants.

- My family and most neighbors support the principles of fair share affordable housing.
- However, City/consultants should not try to use the fair share affordable housing concept to fast track the CEQA/EIR review in an area already plagued with a gross over-concentration of PH. Instead the City/consultants should use the fair share principles and facts about the existing overconcentration of public housing in this one little area to support long term plans to spread PH and other affordable housing throughout City AND County, not to keep it over-concentrated in this one little area
- Related City Council Reports (e.g., April 3, 2018) on funding these consultants and working on this West Broadway/NWLP plan say “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.” The final plan must accomplish this equitable distribution of affordable housing throughout Sacramento, not over-concentrating it here.
- The State Office of Environmental Health Hazard Assessment (OEHHA) shows that this specific West Broadway/NWLP area of Sacramento is one of the most polluted areas and negatively impacted by socioeconomic challenges in the County AND State. The overconcentration of public housing in this area drives OEHHA’s very troubling rankings of high poverty and unemployment, This little Sac area contains over 44% of all of SHRA’s PH units in the ENTIRE City limits, one of the largest concentrations of PH anywhere in the Western United States.
- EACH of the 2 PH projects is, by far, the largest in the entire Sacramento area. This

unhealthy overconcentration is the result of the failed last century government policy of cramming too much public housing in one place – based on racism, NIMBY by more powerful neighborhoods accepting NONE/ZERO, and political expediency. And, right next door to these two huge PH projects, the City/SHRA converted a 75 unit apartment complex it promised the neighbors would always only be for seniors into all low-income all age units. The seniors left because the PH projects made it a dangerous area to live.

- For many decades the overconcentration in this one small Sacramento area has caused major problems for the project tenants, surrounding neighbors and taxpayers. This neighborhood became the most violent area in all of Sacramento in the early 90's.
- The evidence is clear. Placing too much public housing in one little area results in major problems: Overconcentration of poverty, substance abuse and other mental health disorders, child neglect, crime, delinquency, poor education, unemployment and many others. It's warehousing those in need.
- Sacramento must develop and implement a vision and plan to spread and integrate effective public and other affordable housing throughout Sacramento using fair share principles. Please don't leave both of these two huge PH projects crammed in this one small Sacramento area.

Thank You. I appreciate my comments being recorded/ added to community input, and concerns addressed/mitigated.

From: [Chaffee, Craig \(MHSD-FMOR\)@DHCS](mailto:Chaffee,Craig(MHSD-FMOR)@DHCS)
To: [Tom Buford](mailto:Tom.Buford)
Cc: "[Genevive Taylor](mailto:Genevive.Taylor)"; [Craig Chaffee](mailto:Craig.Chaffee)
Subject: RE: Please include all of the following emails/information in the formal written record of public comment on the West Broadway/NWLP planning efforts and EIR and CEQA work specifically.
Date: Tuesday, August 7, 2018 3:42:48 PM

Dear Mr. Buford,

Per Scott's out of office message, to make sure my public comment is received and logged by the City in time. Thank You..

From: Scott Johnson <SRJohnson@cityofsacramento.org>
Sent: Tuesday, August 7, 2018 3:38 PM
To: Chaffee, Craig (MHSD-FMOR)@DHCS <Craig.Chaffee@dhcs.ca.gov>
Subject: Automatic reply: Please include all of the following emails/information in the formal written record of public comment on the West Broadway/NWLP planning efforts and EIR and CEQA work specifically.

I am out of the office and will be returning on Thursday, August 16, 2018.

Please contact Tom Buford, Principal Planner at tbuford@cityofsacramento.org or (916) 799-1531 with any urgent questions.

Thank you.

From: Chaffee, Craig (MHSD-FMOR)@DHCS
Sent: Tuesday, August 7, 2018 3:38 PM
To: 'Scott Johnson' <SRJohnson@cityofsacramento.org>
Cc: 'Tom Buford' <TBuford@cityofsacramento.org>; 'Genevive Taylor' <semperfitaylor@sbcglobal.net>; 'Craig Chaffee' <cjchaffee@comcast.net>
Subject: RE: Please include all of the following emails/information in the formal written record of public comment on the West Broadway/NWLP planning efforts and EIR and CEQA work specifically.

Dear Mr. Johnson,

Please add the following to the public comments for the NWLP/West Broadway develop planning. Thanks as always for being inclusive and capturing public comment on this MAJOR Sacramento planning effort. I understand that the public comment period ends shortly.

The State Office of Environmental Health Hazard Assessment (OEHHA) shows that this specific West Broadway/NWLP area of Sacramento is one of the most polluted areas and negatively impacted by socioeconomic challenges in the County AND State. The overconcentration of public housing in this area drives OEHHS's very troubling rankings of high poverty and unemployment, This little Sac area contains over 44% (751) of all of SHRA's PH units in the

ENTIRE City limits, one of the largest concentrations of PH anywhere in the Western United States. The failed Seavey Circle housing project (warehouses) crams so many children in need right next to the major I-5 freeway with all the air pollution, and next to the poorest performing elementary school in Sacramento for so many DECADES. This is unconscionable. What kind of real government leaders/public servants would do/allow this?

From: Chaffee, Craig (MHSD-FMOR)@DHCS
Sent: Thursday, August 2, 2018 9:32 AM
To: 'Scott Johnson' <SRJohnson@cityofsacramento.org>
Cc: Tom Buford <TBuford@cityofsacramento.org>; craig@eyeonsacramento.org; 'Genevive Taylor' <semperfitaylor@sbcglobal.net>; Craig Chaffee <cjchaffee@comcast.net>
Subject: RE: Please include all of the following emails/information in the formal written record of public comment on the West Broadway/NWLP planning efforts and EIR and CEQA work specifically.

Thank you again Mr. Johnson,

I thought you and your team might also be interested in the following email "string" and related article in the Sacramento Bee.

From: Chaffee, Craig (MHSD-FMOR)@DHCS
Sent: Thursday, March 8, 2018 12:39 PM
To: MayorSteinberg@cityofsacramento.org; shansen@cityofsacramento.org
Cc: 'Genevive Taylor' <semperfitaylor@sbcglobal.net>; Craig Chaffee <cjchaffee@comcast.net>
Subject: JUST FYI: RE: Thank You. Read your great, informative article today in the local Sacramento Bee newspaper.

Sent email below to author of the following Bee article author today.

[CEQA isnt stopping affordable housing in California, it's protecting ...
www.sacbee.com/opinion/op-ed/soapbox/article203907234.html](http://www.sacbee.com/opinion/op-ed/soapbox/article203907234.html)

1 day ago - Developers point a finger at the California Environmental Quality Act as a key obstacle to building more housing. But today's streamlined CEQA protects public health and natural resources while giving voice to disadvantaged communities. ... CEQA isn't stopping housing, it's protecting health. By Allen ...

From: Chaffee, Craig (MHSD-FMOR)@DHCS
Sent: Thursday, March 8, 2018 12:29 PM
To: 'Allen.H@CCAIEJ.org' <Allen.H@CCAIEJ.org>
Cc: Craig Chaffee <cjchaffee@comcast.net>
Subject: Thank You. Read your great, informative article today in the local Sacramento Bee newspaper.

“CEQA isn’t stopping affordable housing” – Great work. Thank you.

My wife and I live in a little neighborhood in Sacramento CA. Many decades ago the City allowed over 44% of all public housing units in the City limits to be crammed in this one little neighborhood. This overconcentration of public housing in one little area is based on old failed past century practices, racism, NIMBY by the more powerful and affluent neighborhoods in Sacramento, developer greed and political expediency. Like you say in your article, falsehoods are substituted for facts. Most of these old dilapidated public housing units in Sacramento CA are also crammed right next to the I-5 Freeway. The area has some of the highest environmental risk/pollution scores in California. Now the City is seriously considering not only rebuilding all that public housing there, but doubling it on the same land. It doesn’t take a rocket scientist to tell you that such concentrated poverty, and next to a major California freeway, is unhealthy and harmful for that community and all those children. Neighbors try to convince the government and developers to spread such needed public housing out throughout Sacramento in a number of good neighborhoods with healthy environments using fair share principles, with not too much in any one neighborhood, but far more overall. Instead is the City government working with developers to “streamline” the public review process (including CEQA issues) and fast track their new public housing development all crammed in this one area, doubled and left by the freeway pollution? There is also a petroleum refinery very nearby. Yet will the City move forward to “streamline” community input and review for development plans? Certainly fits with the facts and bad practices you communicate in your great article. Thank you for your important work and writings. We’re hoping that Sacramento and other leaders in California and our nation will read and learn from great communication like yours. Best to you and your family.

Craig Chaffee
Sacramento, CA

From: Scott Johnson <SRJohnson@cityofsacramento.org>

Sent: Thursday, August 2, 2018 7:51 AM

To: Craig Chaffee <cjchaffee@comcast.net>

Cc: Tom Buford <TBuford@cityofsacramento.org>; craig@eyeonsacramento.org; 'Genevive Taylor' <semperfitaylor@sbcglobal.net>; Chaffee, Craig (MHSD-FMOR)@DHCS <Craig.Chaffee@dhcs.ca.gov>

Subject: RE: Please include all of the following emails/information in the formal written record of public comment on the West Broadway/NWLP planning efforts and EIR and CEQA work specifically.

Dear Mr. Chaffee,

Thank you for your additional response to the Notice of Preparation (NOP) of an Environmental Impact Report for the West Broadway Specific Plan project. Your concerns will be included with responses and comments provided on the NOP to assist in the preparation of the draft environmental impact report.

Thank you again,

Scott Johnson
City of Sacramento
Community Development Department
Environmental Planning Services
300 Richards Blvd., 3rd Floor
Sacramento, CA 95811
(916) 808-5842
srjohnson@cityofsacramento.org

From: Craig Chaffee <cjchaffee@comcast.net>

Sent: Wednesday, August 1, 2018 5:19 PM

To: Scott Johnson <SRJohnson@cityofsacramento.org>

Cc: Tom Buford <TBuford@cityofsacramento.org>; craig@eyeonsacramento.org; 'Genevive Taylor' <semperfitaylor@sbcglobal.net>; Craig.Chaffee@dhcs.ca.gov

Subject: Please include all of the following emails/information in the formal written record of public comment on the West Broadway/NWLP planning efforts and EIR and CEQA work specifically.

Dear Mr. Johnson. City West Broadway/NWLP Area Planning team,

It is my understanding that public input on the “West Broadway/Northwest Land Park Plan project work related to the EIR and CEQA are still being accepted.

Please include/record this email and all its contents in the community/public input for this planning project and related EIR and CEQA work.

Please make sure to address and plan to mitigate the related issues in your EIR and CEQA work.

Please let me know if you have any questions/etc. My family and so many others in this community strive for a much safer community and environment free from such hazards to live in and raise our families. Thank You.

Again, I've been advised by a lawyer very knowledgeable in such law/subject matter that CEQA covers socioeconomic impacts; there is authority that they're covered. The following 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 4 of the Environmental Handbook](http://www.dot.ca.gov/ser/vol1/sec5/ch36eir/chap36.htm#required), for example: <http://www.dot.ca.gov/ser/vol1/sec5/ch36eir/chap36.htm#required>

As state below to your office on July 25, 2018 (in email below):

- The State Office of Environmental Health Hazard Assessment (OEHHA) shows that this specific West Broadway/NWLP area of Sacramento is one of the most polluted areas and negatively impacted by socioeconomic challenges in the County AND State. The overconcentration of public housing in this area drives OEHHA's very troubling rankings of high poverty and unemployment. This little Sac area contains over 44% of all of SHRA's PH units in the ENTIRE City limits, one of the largest concentrations of PH anywhere in the Western United States.
- EACH of the 2 public housing projects in this area is, by far, the largest in the entire Sacramento area. This unhealthy overconcentration is the result of the failed last century government policy of cramming too much public housing in one place – based on racism, NIMBY by more powerful neighborhoods accepting NONE/ZERO, and political expediency. And, right next door to these two huge PH projects, the City/SHRA converted a 75 unit apartment complex it promised the neighbors would always only be for seniors into all low-income all age units. The seniors left because the PH projects made it a dangerous area to live.
- For many decades the overconcentration in this one small Sacramento area has caused major problems for the project tenants, surrounding neighbors and taxpayers. This neighborhood became the most violent area in all of Sacramento in the early 90's.
- The evidence is clear. Placing too much public housing in one little area results

in major problems: Overconcentration of poverty, substance abuse and other mental health disorders, child neglect, crime, delinquency, poor education, unemployment and many others. It's warehousing those in need.

- As reported the area around these two huge public housing projects crammed in this one little area of Sacramento has crime rates much higher than further away in the Land Park community. Using the online SACPD Lexus Nexis Community Crime Mapping analytics tool the types of crimes/events reported inside these housing projects were examined. In the last year there were over 330 reported in the ½ mile radius including both Alder Grove and Marina Vista (aka Seavey Circle). The following is a list of those, many listed often, reported inside these two public housing projects in the last year: Vandalism, Possible Financial Crime, Missing Person, Take Vehicle W/O Owner, Possession/ Sales Opiates/Narcotics, Harassment, Child Custody, DUI, Access Card Fraud, AWDW – Non Firearm, Felony Possession Ammo, Gang Activity, Robbery, Possession Stolen Vehicle, Assault W/ Caustic Chemicals, Petty Theft, Battery Civilian, Willful Disobedience, Danger to Self/Others, Resisting Peace Officer, Harassment, Inflicting Injury on Child, Casualty Report, Burglary Vehicle, Burglary Residence/Forced, Trespassing After Notice, Violated Protective Order, Found Property, Brandish –Non Gun, Child Assault/Sex Activity, Towed Stored Vehicle, Theft – License Plate, Auto Theft Location, Trespassing/Prowler, Domestic Violence, Robbery – Purse Snatch, US Theft of Mail, Forcibly Steal/Take, Brandish Firearm, Arson of Inhabited Structure, Hit/Run Injury, Shooting in Occupied Dwelling. SACPD and others (e.g., UC Davis Study for SHRA) report that many crimes go unreported in the public housing for fear of retaliation, so these crime/event statistics are conservative. The police can only really mop up/react to the underlying problem – the overconcentration of poverty/public housing in one little area of Sacramento that has caused a bad environment to live in, and major and costly problems.
- 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>) Some quick takeaways: 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 public housing in any one area –overconcentration-creates communities with serious crime, health, education, and other major and costly problems that, in turn, further restrict the opportunities of those growing up and living in them. The impacts of neighborhood poverty rates on creating these problems increase rapidly if a neighborhood exceeds about 20 percent poverty.

Again, Sacramento must develop and implement a vision and plan to spread and integrate effective public and other affordable housing throughout Sacramento using fair share principles. Please don't leave both of these two huge PH projects crammed in this one small Sacramento area. Again, the overconcentration of public housing in

this one little Sacramento area, and the resulting major and costly problems must be included in the EIR and CEQA . Alternatives must be developed to mitigate these major problems in this area/community.

As included in my July 25 written communication below, the Mayor of Sacramento says: ***"It is unfair and ultimately unsuccessful to over concentrate any housing or social service effort in one or several neighborhoods."***

The following is another assurance from the current Mayor that plans will be developed to evenly distribute public housing throughout Sacramento, not leave so much in the West Broadway, NWLP area. The decades of major and costly problems are well documented and agreed to by so many in public documentation. These facts must not be dismissed/overlooked.

From: MayorSacramento@mail.senecagov.com
[<mailto:MayorSacramento@mail.senecagov.com>]

Sent: Tuesday, January 23, 2018 3:38 PM

To: Craig Chaffee

Subject: Re: FW: Sent following letter to Bee editors to publish and posted on our Next Door site.

Luis Montes has responded:

Dear Craig Chaffee,

*Thank you for contacting Mayor Darrell Steinberg's Office. We appreciate your willingness to share your thoughts and concerns with our office and we have forwarded your comments to the appropriate City staff. **The mayor agrees, it is necessary to have even distribution of public housing in all eight districts throughout Sacramento and in 2018, the mayor's goal is to increase the capacity to create an environment that spurs the construction of more public and affordable housing throughout all of Sacramento.** If you have any additional questions or concerns on this topic please do not hesitate to ask.*

Thank you, again, for contacting our office. Mayor Steinberg appreciates hearing from you.

Sincerely,

Luis Montes

Director of Constituent Affairs

Office of Mayor Darrell Steinberg

LMontes@cityofsacramento.org

From: Chaffee, Craig (MHSD-FMOR)@DHCS

Sent: Wednesday, July 25, 2018 12:33 PM

To: 'Scott Johnson' <SRJohnson@cityofsacramento.org>

Cc: Genevive Taylor <semperfitaylor@sbcglobal.net>; Craig Chaffee <cjchaffee@comcast.net>; Tom Buford <TBuford@cityofsacramento.org>

Subject: RE: Input as resident in NWLP area where you are planning development.

Dear Mr. Johnson,

Thank you for your responsiveness. Since 1980 when my wife and I moved to the little neighborhood ("Upper Land Park) with the 2 huge failed past century government projects (e.g., Seavey Circle and Alder Grove) we have been assured many times by government officials (e.g. past SHRA Director) that they understood that concentrating so much poverty and public housing in one little area (warehousing) was a failed government practice, and that at least half of the existing public housing units crammed in this one tiny little Sac area must be moved/integrated into other Sac areas using fair share principles. Yet, push comes to shove and NIMBY, the 2 huge projects have been left here by government , with all the major and costly problems – decade after decade. Below is a direct communication from the Mayor's Office on the issue. Must hard working tax paying homeowners all leave –seek higher safer ground? Will the City ever actually make good on their promises, or just build more of the same here, put more lipstick on the pig, and give it some fancy new name (e.g., Seavey Estates)? Again thank you for anything you can do to help affect real positive change for this very fragile community you now called North West Land Park.

Hi Craig,

Thanks for writing to the Mayor about the concern a of overconcentration of public housing in Upper Land Park.

I understand what I say does not carry the weight of what Darrell says or what I may communicate his position to be. To that end, here are Darrell's thoughts on the issue from him personally:

"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."

Warm regards,

**Kelly F. Rivas
Campaign Manager**

From: Scott Johnson <SRJohnson@cityofsacramento.org>
Sent: Wednesday, July 25, 2018 12:11 PM
To: Chaffee, Craig (MHSD-FMOR)@DHCS <Craig.Chaffee@dhcs.ca.gov>
Cc: Genevive Taylor <semperfitaylor@sbcglobal.net>; Craig Chaffee <cjchaffee@comcast.net>; Tom Buford <TBuford@cityofsacramento.org>
Subject: RE: Input as resident in NWLP area where you are planning development.

Dear Mr. Chaffee,

Thank you for your response to the Notice of Preparation (NOP) of an Environmental Impact Report for the West Broadway Specific Plan project. Your concerns will be included with responses and comments provided on the NOP to assist in the preparation of the draft environmental impact report.

Thank you,

Scott Johnson
City of Sacramento
Community Development Department
Environmental Planning Services
300 Richards Blvd., 3rd Floor
Sacramento, CA 95811
(916) 808-5842
srjohnson@cityofsacramento.org

From: Chaffee, Craig (MHSD-FMOR)@DHCS <Craig.Chaffee@dhcs.ca.gov>
Sent: Wednesday, July 25, 2018 12:01 PM
To: Scott Johnson <SRJohnson@cityofsacramento.org>
Cc: Genevive Taylor <semperfitaylor@sbcglobal.net>; Craig Chaffee <cjchaffee@comcast.net>
Subject: FW: Input as resident in NWLP area where you are planning development.

Dear Mr. Johnson,

I got the following email reply from Mr. Buford forwarding to you to make sure this was received "on time" for any community input deadline on this matter.

I am out of the office and will return Friday, August 3, 2018. If you need immediate assistance please contact Scott Johnson at srjohnson@cityofsacramento.org or phone at (916) 808-5842.

Thank You.

From: Chaffee, Craig (MHSD-FMOR)@DHCS
Sent: Wednesday, July 25, 2018 11:48 AM
To: 'tbuford@cityofsacramento.org' <tbuford@cityofsacramento.org>
Cc: 'Helen Selph' <HSelph@cityofsacramento.org>; 'Greg Sandlund' <GSandlund@cityofsacramento.org>; 'Genevive Taylor' <semperfitaylor@sbcglobal.net>; 'Craig Chaffee' <cjchaffee@comcast.net>
Subject: Input as resident in NWLP area where you are planning development.

Dear Mr. Buford,

I was planning on attending the City/consultant meeting tonight on West Broadway/NWLP planning. But as a still working senior citizen (and grandparent) I'm not sure I'll brave the heat, and attend in person. So I'm offering some input here as a LONG TERM resident of the area. I've communicated numerous times with Helen Selph too. I find her responsive and informative. Most appreciated! She can likely share previous communications. Below I try to focus on CEQA/EIR related concerns. I've included Art Taylor – Board Member on our Land Park Community Association. Mr. Taylor has been very involved in the public housing issues for a long time.

Helen Selph communicated to me about possible CEQA 'Streamlining' on this project: "Detailed evaluation of potential residential and mixed use projects proposed under the Northwest Land Park Specific Plan will expedite the approval process for future projects that are consistent with the Northwest Land Park Specific Plan. Depending on the characteristics of future projects, streamlining under the Northwest Land Park Specific Plan EIR may range from a complete exemption to preparation of a focused, project-specific environmental document. (Please note that due to Federal funding requirements, any re-development of Marina Vista and Alder Grove public housing properties will require additional environmental review, including NEPA)."

My family has lived in the small surrounding fragile neighborhood since 1980.

I consulted a lawyer knowledgeable on CEQA/EIRs. The City and their consultants

(partially hired because of their knowledge/experience on how to “fast track” CEQA/EIR reviews) should not try to use the ‘fair share affordable housing’ concept to fast track the CEQA/EIR reviews in an area already plagued with a gross over-concentration of public housing (PH) . That is political and hypocritical. That is not a correct use of the fair share concept for fast tracking CEQA/EIR reviews. Community has right to legally dispute the PH overconcentration /resulting community problems for decades using CEQA; such CEQA reviews can and should include socioeconomic issues too.

Here’s some main points for the City/consultants.

- My family and most neighbors support the principles of fair share affordable housing.
- However, City/consultants should not try to use the fair share affordable housing concept to fast track the CEQA/EIR review in an area already plagued with a gross over-concentration of PH. Instead the City/consultants should use the fair share principles and facts about the existing overconcentration of public housing in this one little area to support long term plans to spread PH and other affordable housing throughout City AND County, not to keep it over-concentrated in this one little area
- Related City Council Reports (e.g., April 3, 2018) on funding these consultants and working on this West Broadway/NWLP plan say “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.” The final plan must accomplish this equitable distribution of affordable housing throughout Sacramento, not over-concentrating it here.
- The State Office of Environmental Health Hazard Assessment (OEHHA) shows that this specific West Broadway/NWLP area of Sacramento is one of the most polluted areas and negatively impacted by socioeconomic challenges in the County AND State. The overconcentration of public housing in this area drives OEHHA’s very troubling rankings of high poverty and unemployment, This little Sac area contains over 44% of all of SHRA’s PH units in the ENTIRE City limits, one of the largest concentrations of PH anywhere in the Western United States.
- EACH of the 2 PH projects is, by far, the largest in the entire Sacramento area. This unhealthy overconcentration is the result of the failed last century government policy of cramming too much public housing in one place – based on racism, NIMBY by more powerful neighborhoods accepting NONE/ZERO, and political expediency. And, right next door to these two huge PH projects, the City/SHRA converted a 75 unit apartment complex it promised the neighbors would always only be for seniors into all low-income all age units. The seniors left because the PH projects made it a dangerous area to live.
- For many decades the overconcentration in this one small Sacramento area has caused major problems for the project tenants, surrounding neighbors and taxpayers.

This neighborhood became the most violent area in all of Sacramento in the early 90's.

- The evidence is clear. Placing too much public housing in one little area results in major problems: Overconcentration of poverty, substance abuse and other mental health disorders, child neglect, crime, delinquency, poor education, unemployment and many others. It's warehousing those in need.
- Sacramento must develop and implement a vision and plan to spread and integrate effective public and other affordable housing throughout Sacramento using fair share principles. Please don't leave both of these two huge PH projects crammed in this one small Sacramento area.

Thank You. I appreciate my comments being recorded/ added to community input, and concerns addressed/mitigated.

From: [Chaffee, Craig \(MHSD-FMOR\)@DHCS](mailto:Chaffee,Craig(MHSD-FMOR)@DHCS)
To: [Scott Johnson](mailto:Scott.Johnson)
Cc: [Tom Buford](mailto:Tom.Buford); ["Genevive Taylor"](mailto:Genevive.Taylor); [Craig Chaffee](mailto:Craig.Chaffee)
Subject: RE: Please include all of the following emails/information in the formal written record of public comment on the West Broadway/NWLP planning efforts and EIR and CEQA work specifically.
Date: Tuesday, August 7, 2018 3:38:20 PM

Dear Mr. Johnson,

Please add the following to the public comments for the NWLP/West Broadway develop planning. Thanks as always for being inclusive and capturing public comment on this MAJOR Sacramento planning effort. I understand that the public comment period ends shortly.

The State Office of Environmental Health Hazard Assessment (OEHHA) shows that this specific West Broadway/NWLP area of Sacramento is one of the most polluted areas and negatively impacted by socioeconomic challenges in the County AND State. The overconcentration of public housing in this area drives OEHHA's very troubling rankings of high poverty and unemployment, This little Sac area contains over 44% (751) of all of SHRA's PH units in the ENTIRE City limits, one of the largest concentrations of PH anywhere in the Western United States. The failed Seavey Circle housing project (warehouses) crams so many children in need right next to the major I-5 freeway with all the air pollution, and next to the poorest performing elementary school in Sacramento for so many DECADES. This is unconscionable. What kind of real government leaders/public servants would do/allow this?

From: Chaffee, Craig (MHSD-FMOR)@DHCS
Sent: Thursday, August 2, 2018 9:32 AM
To: 'Scott Johnson' <SRJohnson@cityofsacramento.org>
Cc: Tom Buford <TBuford@cityofsacramento.org>; craig@eyeonsacramento.org; 'Genevive Taylor' <semperfitaylor@sbcglobal.net>; [Craig Chaffee <cjchaffee@comcast.net>](mailto:Craig.Chaffee@comcast.net)
Subject: RE: Please include all of the following emails/information in the formal written record of public comment on the West Broadway/NWLP planning efforts and EIR and CEQA work specifically.

Thank you again Mr. Johnson,

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Subject: JUST FYI: RE: Thank You. Read your great, informative article today in the local

Sacramento Bee newspaper.

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track their new public housing development all crammed in this one area, doubled and left by the freeway pollution? There is also a petroleum refinery very nearby. Yet will the City move forward to “streamline” community input and review for development plans? Certainly fits with the facts and bad practices you communicate in your great article. Thank you for your important work and writings. We’re hoping that Sacramento and other leaders in California and our nation will read and learn from great communication like yours. Best to you and your family.

Craig Chaffee
Sacramento, CA

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Sent: Thursday, August 2, 2018 7:51 AM
To: Craig Chaffee <cjchaffee@comcast.net>
Cc: Tom Buford <TBuford@cityofsacramento.org>; craig@eyeonsacramento.org; 'Genevive Taylor' <semperfitaylor@sbcglobal.net>; Chaffee, Craig (MHSD-FMOR)@DHCS <Craig.Chaffee@dhcs.ca.gov>
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Sacramento, CA 95811
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Please make sure to address and plan to mitigate the related issues in your EIR and CEQA work.

Please let me know if you have any questions/etc. My family and so many others in this community strive for a much safer community and environment free from such hazards to live in and raise our families. Thank You.

Again, I've been advised by a lawyer very knowledgeable in such law/subject matter that CEQA covers socioeconomic impacts; there is authority that they're covered. The following is from the CalTrans Handbook:

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Sac area contains over 44% of all of SHRA's PH units in the ENTIRE City limits, one of the largest concentrations of PH anywhere in the Western United States.

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- For many decades the overconcentration in this one small Sacramento area has caused major problems for the project tenants, surrounding neighbors and taxpayers. This neighborhood became the most violent area in all of Sacramento in the early 90's.
- The evidence is clear. Placing too much public housing in one little area results in major problems: Overconcentration of poverty, substance abuse and other mental health disorders, child neglect, crime, delinquency, poor education, unemployment and many others. It's warehousing those in need.
- As reported the area around these two huge public housing projects crammed in this one little area of Sacramento has crime rates much higher than further away in the Land Park community. Using the online SACPD Lexus Nexis Community Crime Mapping analytics tool he types of crimes/events reported inside these housing projects were examined.. In the last year there were over 330 reported in the ½ mile radius including both Alder Grove and Marina Vista (aka Seavey Circle). The following is a list of those, many listed often, reported inside these two public housing projects in the last year: Vandalism, Possible Financial Crime, Missing Person, Take Vehicle W/O Owner, Possession/ Sales Opiates/Narcotics, Harassment, Child Custody, DUI , Access Card Fraud, AWDW – Non Firearm, Felony Possession Ammo, Gang Activity, Robbery, Possession Stolen Vehicle, Assault W/ Caustic Chemicals, Petty Theft, Battery Civilian, Willful Disobedience, Danger to Self/Others, Resisting Peace Officer, Harassment, Inflicting Injury on Child, Casualty Report, Burglary Vehicle, Burglary Residence/Forced, Trespassing After Notice, Violated Protective Order, Found Property, Brandish –Non Gun, Child Assault/Sex Activity, Towed Stored Vehicle, Theft – License Plate, Auto Theft Location, Trespassing/Prowler, Domestic Violence, Robbery – Purse Snatch, US Theft of Mail, Forcibly Steal/Take, Brandish Firearm, Arson of Inhabited Structure, Hit/Run Injury, Shooting in Occupied Dwelling. SACPD and others (e.g., UC Davis Study for SHRA) report that many crimes go unreported in the public housing for fear of retaliation, so these crime/event statistics are conservative. The police can only really mop up/react to the underlying problem – the overconcentration of poverty/public housing in one little area of Sacramento that has caused a bad

environment to live in, and major and costly problems.

- 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> Some quick takeaways: 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 public housing in any one area –overconcentration-creates communities with serious crime, health, education, and other major and costly problems that, in turn, further restrict the opportunities of those growing up and living in them. The impacts of neighborhood poverty rates on creating these problems increase rapidly if a neighborhood exceeds about 20 percent poverty.

Again, Sacramento must develop and implement a vision and plan to spread and integrate effective public and other affordable housing throughout Sacramento using fair share principles. Please don’t leave both of these two huge PH projects crammed in this one small Sacramento area. Again, the overconcentration of public housing in this one little Sacramento area, and the resulting major and costly problems must be included in the EIR and CEQA . Alternatives must be developed to mitigate these major problems in this area/community.

As included in my July 25 written communication below, the Mayor of Sacramento says: **“It is unfair and ultimately unsuccessful to over concentrate any housing or social service effort in one or several neighborhoods.”**

The following is another assurance from the current Mayor that plans will be developed to evenly distribute public housing throughout Sacramento, not leave so much in the West Broadway, NWLP area. The decades of major and costly problems are well documented and agreed to by so many in public documentation. These facts must not be dismissed/overlooked.

From: MayorSacramento@mail.senecagov.com
[\[mailto:MayorSacramento@mail.senecagov.com\]](mailto:MayorSacramento@mail.senecagov.com)

Sent: Tuesday, January 23, 2018 3:38 PM

To: Craig Chaffee

Subject: Re: FW: Sent following letter to Bee editors to publish and posted on our Next Door site.

Luis Montes has responded:

Dear Craig Chaffee,

*Thank you for contacting Mayor Darrell Steinberg's Office. We appreciate your willingness to share your thoughts and concerns with our office and we have forwarded your comments to the appropriate City staff. **The mayor agrees, it is necessary to have even distribution of public housing in all eight districts throughout Sacramento** and in 2018, **the mayor's goal is to increase the capacity to create an environment that spurs the construction of more public and affordable housing throughout all of Sacramento.** If you have any additional questions or concerns on this topic please do not hesitate to ask.*

Thank you, again, for contacting our office. Mayor Steinberg appreciates hearing from you.

Sincerely,

Luis Montes

Director of Constituent Affairs

Office of Mayor Darrell Steinberg

LMontes@cityofsacramento.org

From: Chaffee, Craig (MHSD-FMOR)@DHCS

Sent: Wednesday, July 25, 2018 12:33 PM

To: 'Scott Johnson' <SRJohnson@cityofsacramento.org>

Cc: Genevive Taylor <semperfitaylor@sbcglobal.net>; Craig Chaffee <cjchaffee@comcast.net>; Tom Buford <TBuford@cityofsacramento.org>

Subject: RE: Input as resident in NWLP area where you are planning development.

Dear Mr. Johnson,

Thank you for your responsiveness. Since 1980 when my wife and I moved to the little neighborhood ("Upper Land Park) with the 2 huge failed past century government projects (e.g., Seavey Circle and Alder Grove) we have been assured many times by government officials (e.g. past SHRA Director) that they understood that concentrating so much poverty and public housing in one little area (warehousing) was a failed government practice, and that at least half of the existing public housing units crammed in this one tiny little Sac area must be moved/integrated into other Sac areas using fair share principles. Yet, push comes to shove and NIMBY, the 2 huge projects have been left here by government , with all the major and costly problems – decade after decade. Below is a direct

communication from the Mayor's Office on the issue. Must hard working tax paying homeowners all leave –seek higher safer ground? Will the City ever actually make good on their promises, or just build more of the same here, put more lipstick on the pig, and give it some fancy new name (e.g., Seavey Estates)? Again thank you for anything you can do to help affect real positive change for this very fragile community you now called North West Land Park.

Hi Craig,

Thanks for writing to the Mayor about the concern a of overconcentration of public housing in Upper Land Park.

I understand what I say does not carry the weight of what Darrell says or what I may communicate his position to be. To that end, here are Darrell's thoughts on the issue from him personally:

"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."

Warm regards,

**Kelly F. Rivas
Campaign Manager**

From: Scott Johnson <SRJohnson@cityofsacramento.org>
Sent: Wednesday, July 25, 2018 12:11 PM
To: Chaffee, Craig (MHSD-FMOR)@DHCS <Craig.Chaffee@dhcs.ca.gov>
Cc: Genevive Taylor <semperfitaylor@sbcglobal.net>; Craig Chaffee <cjchaffee@comcast.net>; Tom Buford <TBuford@cityofsacramento.org>
Subject: RE: Input as resident in NWLP area where you are planning development.

Dear Mr. Chaffee,

Thank you for your response to the Notice of Preparation (NOP) of an Environmental Impact Report for the West Broadway Specific Plan project. Your concerns will be included with responses and comments provided on the NOP to assist in the preparation of the draft environmental impact report.

Thank you,

Scott Johnson
City of Sacramento
Community Development Department
Environmental Planning Services
300 Richards Blvd., 3rd Floor
Sacramento, CA 95811
(916) 808-5842
srjohnson@cityofsacramento.org

From: Chaffee, Craig (MHSD-FMOR)@DHCS <Craig.Chaffee@dhcs.ca.gov>
Sent: Wednesday, July 25, 2018 12:01 PM
To: Scott Johnson <SRJohnson@cityofsacramento.org>
Cc: Genevive Taylor <semperfitaylor@sbcglobal.net>; Craig Chaffee <cjchaffee@comcast.net>
Subject: FW: Input as resident in NWLP area where you are planning development.

Dear Mr. Johnson,

I got the following email reply from Mr. Buford forwarding to you to make sure this was received "on time" for any community input deadline on this matter.

I am out of the office and will return Friday, August 3, 2018. If you need immediate assistance please contact Scott Johnson at srjohnson@cityofsacramento.org or phone at (916) 808-5842.

Thank You.

From: Chaffee, Craig (MHSD-FMOR)@DHCS
Sent: Wednesday, July 25, 2018 11:48 AM
To: 'tbuford@cityofsacramento.org' <tbuford@cityofsacramento.org>
Cc: 'Helen Selph' <HSelph@cityofsacramento.org>; 'Greg Sandlund' <GSandlund@cityofsacramento.org>; 'Genevive Taylor' <semperfitaylor@sbcglobal.net>; 'Craig Chaffee' <cjchaffee@comcast.net>
Subject: Input as resident in NWLP area where you are planning development.

Dear Mr. Buford,

I was planning on attending the City/consultant meeting tonight on West Broadway/NWLP planning. But as a still working senior citizen (and grandparent) I'm not sure I'll brave the heat, and attend in person. So I'm offering some input here as

a LONG TERM resident of the area. I've communicated numerous times with Helen Selph too. I find her responsive and informative. Most appreciated! She can likely share previous communications. Below I try to focus on CEQA/EIR related concerns. I've included Art Taylor – Board Member on our Land Park Community Association. Mr. Taylor has been very involved in the public housing issues for a long time.

Helen Selph communicated to me about possible CEQA 'Streamlining' on this project: "Detailed evaluation of potential residential and mixed use projects proposed under the Northwest Land Park Specific Plan will expedite the approval process for future projects that are consistent with the Northwest Land Park Specific Plan. Depending on the characteristics of future projects, streamlining under the Northwest Land Park Specific Plan EIR may range from a complete exemption to preparation of a focused, project-specific environmental document. (Please note that due to Federal funding requirements, any re-development of Marina Vista and Alder Grove public housing properties will require additional environmental review, including NEPA)."

My family has lived in the small surrounding fragile neighborhood since 1980.

I consulted a lawyer knowledgeable on CEQA/EIRs. The City and their consultants (partially hired because of their knowledge/experience on how to "fast track" CEQA/EIR reviews) should not try to use the 'fair share affordable housing' concept to fast track the CEQA/EIR reviews in an area already plagued with a gross over-concentration of public housing (PH). That is political and hypocritical. That is not a correct use of the fair share concept for fast tracking CEQA/EIR reviews. Community has right to legally dispute the PH overconcentration /resulting community problems for decades using CEQA; such CEQA reviews can and should include socioeconomic issues too.

Here's some main points for the City/consultants.

- My family and most neighbors support the principles of fair share affordable housing.
- However, City/consultants should not try to use the fair share affordable housing concept to fast track the CEQA/EIR review in an area already plagued with a gross over-concentration of PH. Instead the City/consultants should use the fair share principles and facts about the existing overconcentration of public housing in this one little area to support long term plans to spread PH and other affordable housing throughout City AND County, not to keep it over-concentrated in this one little area
- Related City Council Reports (e.g., April 3, 2018) on funding these consultants and working on this West Broadway/NWLP plan say "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." The final plan must accomplish this equitable distribution of affordable housing throughout Sacramento, not over-concentrating it here.

- The State Office of Environmental Health Hazard Assessment (OEHHA) shows that this specific West Broadway/NWLP area of Sacramento is one of the most polluted areas and negatively impacted by socioeconomic challenges in the County AND State. The overconcentration of public housing in this area drives OEHHA's very troubling rankings of high poverty and unemployment. This little Sac area contains over 44% of all of SHRA's PH units in the ENTIRE City limits, one of the largest concentrations of PH anywhere in the Western United States.
- EACH of the 2 PH projects is, by far, the largest in the entire Sacramento area. This unhealthy overconcentration is the result of the failed last century government policy of cramming too much public housing in one place – based on racism, NIMBY by more powerful neighborhoods accepting NONE/ZERO, and political expediency. And, right next door to these two huge PH projects, the City/SHRA converted a 75 unit apartment complex it promised the neighbors would always only be for seniors into all low-income all age units. The seniors left because the PH projects made it a dangerous area to live.
- For many decades the overconcentration in this one small Sacramento area has caused major problems for the project tenants, surrounding neighbors and taxpayers. This neighborhood became the most violent area in all of Sacramento in the early 90's.
- The evidence is clear. Placing too much public housing in one little area results in major problems: Overconcentration of poverty, substance abuse and other mental health disorders, child neglect, crime, delinquency, poor education, unemployment and many others. It's warehousing those in need.
- Sacramento must develop and implement a vision and plan to spread and integrate effective public and other affordable housing throughout Sacramento using fair share principles. Please don't leave both of these two huge PH projects crammed in this one small Sacramento area.

Thank You. I appreciate my comments being recorded/ added to community input, and concerns addressed/mitigated.

From: [Chaffee, Craig \(MHSD-FMOR\)@DHCS](mailto:Chaffee,Craig(MHSD-FMOR)@DHCS)
To: [Tom Buford](#)
Cc: ["Genevive Taylor"](#); [Craig Chaffee](#)
Subject: RE: Please include all of the following emails/information in the formal written record of public comment on the West Broadway/NWLP planning efforts and EIR and CEQA work specifically.
Date: Wednesday, August 8, 2018 8:42:14 AM

Thank you Mr. Buford,.

My wife and I moved in this fragile little area, bought a little modest home here, in 1980. The area has potential but is plagued by the serious overconcentration of public housing and the resulting many major and costly problems. In the early 90's the great SHRA Director – Betty Turner – told us neighbors working with her on so many problems related to putting too much need public housing in one place that the future in Sacramento should be splitting up such public housing and integrating it a lot more throughout Sacramento – that overconcentration of such public housing (e.g., projects, warehouses) was harmful - created so many problems and costs. But Betty left to do great things on the East Coast. Time has gone by with little to no change – all talk and long term planning. About 5 years ago in early planning for the ULP/Broadway Transformation plan submitted to HUD in November 2015 (as you know not funded – Sac ended up proposing to leave the 751 public housing units all where they are and add many more units funded by low income tax credits – further concentrating such housing), SHRA told neighbors meeting with them that the “rough plan” was to leave about 325 to 350 of the 751 units (about ½) here and integrate the rest throughout Sacramento. That seemed fair, right. Last couple years Mayor has joined the vision for “fair share” distribution of the public and other affordable housing throughout Sacramento, and has repeatedly communicated to neighbors that he agrees there is way too much here . But still no progress. Time flies. My wife and I are grandparents now and wondering if this will ever change for the better, or if we need to give up hope and move. Sad. Frustrating. Thanks for listening and anything your team can do to effect real and positive change in this fragile neighborhood..

From: Tom Buford <TBuford@cityofsacramento.org>
Sent: Wednesday, August 8, 2018 8:22 AM
To: Chaffee, Craig (MHSD-FMOR)@DHCS <Craig.Chaffee@dhcs.ca.gov>
Cc: 'Genevive Taylor' <semperfitaylor@sbcglobal.net>; Craig Chaffee <cjchaffee@comcast.net>
Subject: RE: Please include all of the following emails/information in the formal written record of public comment on the West Broadway/NWLP planning efforts and EIR and CEQA work specifically.

Mr. Chaffee:

Your several comments regarding the Notice of Preparation for the West Broadway Specific Plan are being logged as they are received.

Thank you for your interest in the project.

Tom

Tom Buford, Manager

Environmental Planning Services
(916) 799-1531

From: Chaffee, Craig (MHSD-FMOR)@DHCS <Craig.Chaffee@dhcs.ca.gov>
Sent: Tuesday, August 7, 2018 3:43 PM
To: Tom Buford <TBuford@cityofsacramento.org>
Cc: 'Genevive Taylor' <semperfitaylor@sbcglobal.net>; Craig Chaffee <cjchaffee@comcast.net>
Subject: RE: Please include all of the following emails/information in the formal written record of public comment on the West Broadway/NWLP planning efforts and EIR and CEQA work specifically.

Dear Mr. Buford,

Per Scott's out of office message, to make sure my public comment is received and logged by the City in time. Thank You..

From: Scott Johnson <SRJohnson@cityofsacramento.org>
Sent: Tuesday, August 7, 2018 3:38 PM
To: Chaffee, Craig (MHSD-FMOR)@DHCS <Craig.Chaffee@dhcs.ca.gov>
Subject: Automatic reply: Please include all of the following emails/information in the formal written record of public comment on the West Broadway/NWLP planning efforts and EIR and CEQA work specifically.

I am out of the office and will be returning on Thursday, August 16, 2018.

Please contact Tom Buford, Principal Planner at tbuford@cityofsacramento.org or (916) 799-1531 with any urgent questions.

Thank you.

From: Chaffee, Craig (MHSD-FMOR)@DHCS
Sent: Tuesday, August 7, 2018 3:38 PM
To: 'Scott Johnson' <SRJohnson@cityofsacramento.org>
Cc: 'Tom Buford' <TBuford@cityofsacramento.org>; 'Genevive Taylor' <semperfitaylor@sbcglobal.net>; 'Craig Chaffee' <cjchaffee@comcast.net>
Subject: RE: Please include all of the following emails/information in the formal written record of public comment on the West Broadway/NWLP planning efforts and EIR and CEQA work specifically.

Dear Mr. Johnson,

Please add the following to the public comments for the NWLP/West Broadway develop planning. Thanks as always for being inclusive and capturing public comment on this MAJOR Sacramento planning effort. I understand that the public comment period ends shortly.

The State Office of Environmental Health Hazard Assessment (OEHHA) shows

that this specific West Broadway/NWLP area of Sacramento is one of the most polluted areas and negatively impacted by socioeconomic challenges in the County AND State. The overconcentration of public housing in this area drives OEHHS's very troubling rankings of high poverty and unemployment, This little Sac area contains over 44% (751) of all of SHRA's PH units in the ENTIRE City limits, one of the largest concentrations of PH anywhere in the Western United States. The failed Seavey Circle housing project (warehouses) crams so many children in need right next to the major I-5 freeway with all the air pollution, and next to the poorest performing elementary school in Sacramento for so many DECADES. This is unconscionable. What kind of real government leaders/public servants would do/allow this?

From: Chaffee, Craig (MHSD-FMOR)@DHCS
Sent: Thursday, August 2, 2018 9:32 AM
To: 'Scott Johnson' <SRJohnson@cityofsacramento.org>
Cc: Tom Buford <TBuford@cityofsacramento.org>; craig@eyeonsacramento.org; 'Genevive Taylor' <semperfitaylor@sbcglobal.net>; Craig Chaffee <cjchaffee@comcast.net>
Subject: RE: Please include all of the following emails/information in the formal written record of public comment on the West Broadway/NWLP planning efforts and EIR and CEQA work specifically.

Thank you again Mr. Johnson,

I thought you and your team might also be interested in the following email "string" and related article in the Sacramento Bee.

From: Chaffee, Craig (MHSD-FMOR)@DHCS
Sent: Thursday, March 8, 2018 12:39 PM
To: MayorSteinberg@cityofsacramento.org; shansen@cityofsacramento.org
Cc: 'Genevive Taylor' <semperfitaylor@sbcglobal.net>; Craig Chaffee <cjchaffee@comcast.net>
Subject: JUST FYI: RE: Thank You. Read your great, informative article today in the local Sacramento Bee newspaper.

Sent email below to author of the following Bee article author today.

[CEQA isnt stopping affordable housing in California, it's protecting ...
www.sacbee.com/opinion/op-ed/soapbox/article203907234.html](http://www.sacbee.com/opinion/op-ed/soapbox/article203907234.html)

1 day ago - Developers point a finger at the California Environmental Quality Act as a key obstacle to building more housing. But today's streamlined CEQA protects public health and natural resources while giving voice to disadvantaged communities. ... CEQA isn't stopping housing, it's protecting health.
By Allen ...

From: Chaffee, Craig (MHSD-FMOR)@DHCS

Sent: Thursday, March 8, 2018 12:29 PM

To: 'Allen.H@CCAEEJ.org' <Allen.H@CCAEEJ.org>

Cc: Craig Chaffee <cjchaffee@comcast.net>

Subject: Thank You. Read your great, informative article today in the local Sacramento Bee newspaper.

“CEQA isn’t stopping affordable housing” – Great work. Thank you.

My wife and I live in a little neighborhood in Sacramento CA. Many decades ago the City allowed over 44% of all public housing units in the City limits to be crammed in this one little neighborhood. This overconcentration of public housing in one little area is based on old failed past century practices, racism, NIMBY by the more powerful and affluent neighborhoods in Sacramento, developer greed and political expediency. Like you say in your article, falsehoods are substituted for facts. Most of these old dilapidated public housing units in Sacramento CA are also crammed right next to the I-5 Freeway. The area has some of the highest environmental risk/pollution scores in California. Now the City is seriously considering not only rebuilding all that public housing there, but doubling it on the same land. It doesn’t take a rocket scientist to tell you that such concentrated poverty, and next to a major California freeway, is unhealthy and harmful for that community and all those children. Neighbors try to convince the government and developers to spread such needed public housing out throughout Sacramento in a number of good neighborhoods with healthy environments using fair share principles, with not too much in any one neighborhood, but far more overall. Instead is the City government working with developers to “streamline” the public review process (including CEQA issues) and fast track their new public housing development all crammed in this one area, doubled and left by the freeway pollution? There is also a petroleum refinery very nearby. Yet will the City move forward to “streamline” community input and review for development plans? Certainly fits with the facts and bad practices you communicate in your great article. Thank you for your important work and writings. We’re hoping that Sacramento and other leaders in California and our nation will read and learn from great communication like yours. Best to you and your family.

Craig Chaffee

Sacramento, CA

From: Scott Johnson <SRJohnson@cityofsacramento.org>

Sent: Thursday, August 2, 2018 7:51 AM

To: Craig Chaffee <cjchaffee@comcast.net>

Cc: Tom Buford <TBuford@cityofsacramento.org>; craig@eyeonsacramento.org; 'Genevive Taylor' <semperfitaylor@sbcglobal.net>; Chaffee, Craig (MHSD-FMOR)@DHCS <Craig.Chaffee@dhcs.ca.gov>

Subject: RE: Please include all of the following emails/information in the formal written record of public comment on the West Broadway/NWLP planning efforts and EIR and CEQA work specifically.

Dear Mr. Chaffee,

Thank you for your additional response to the Notice of Preparation (NOP) of an Environmental Impact Report for the West Broadway Specific Plan project. Your concerns will be included with responses and comments provided on the NOP to assist in the preparation of the draft environmental impact report.

Thank you again,

Scott Johnson
City of Sacramento
Community Development Department
Environmental Planning Services
300 Richards Blvd., 3rd Floor
Sacramento, CA 95811
(916) 808-5842
srjohnson@cityofsacramento.org

From: Craig Chaffee <cjchaffee@comcast.net>

Sent: Wednesday, August 1, 2018 5:19 PM

To: Scott Johnson <SRJohnson@cityofsacramento.org>

Cc: Tom Buford <TBuford@cityofsacramento.org>; craig@eyeonsacramento.org; 'Genevive Taylor' <semperfitaylor@sbcglobal.net>; Craig.Chaffee@dhcs.ca.gov

Subject: Please include all of the following emails/information in the formal written record of public comment on the West Broadway/NWLP planning efforts and EIR and CEQA work specifically.

Dear Mr. Johnson. City West Broadway/NWLP Area Planning team,

It is my understanding that public input on the “West Broadway/Northwest Land Park Plan project work related to the EIR and CEQA are still being

accepted.

Please include/record this email and all its contents in the community/public input for this planning project and related EIR and CEQA work.

Please make sure to address and plan to mitigate the related issues in your EIR and CEQA work.

Please let me know if you have any questions/etc. My family and so many others in this community strive for a much safer community and environment free from such hazards to live in and raise our families. Thank You.

Again, I've been advised by a lawyer very knowledgeable in such law/subject matter that CEQA covers socioeconomic impacts; there is authority that they're covered. The following 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 4 of the Environmental Handbook](http://www.dot.ca.gov/ser/vol1/sec5/ch36eir/chap36.htm#required), for example: <http://www.dot.ca.gov/ser/vol1/sec5/ch36eir/chap36.htm#required>

As state below to your office on July 25, 2018 (in email below):

- The State Office of Environmental Health Hazard Assessment (OEHHA) shows that this specific West Broadway/NWLP area of Sacramento is one of the most polluted areas and negatively impacted by socioeconomic challenges in the County AND State. The overconcentration of public housing in this area drives OEHHA's very troubling rankings of high poverty and unemployment. This little Sac area contains over 44% of all of SHRA's PH units in the ENTIRE City limits, one of the largest concentrations of PH anywhere in the Western United States.
- EACH of the 2 public housing projects in this area is, by far, the largest in the entire Sacramento area. This unhealthy overconcentration is the result of the failed last century government policy of cramming too much public housing in one place – based on racism, NIMBY by more powerful neighborhoods accepting NONE/ZERO, and political expediency. And, right next door to these two huge PH projects, the City/SHRA converted a 75 unit apartment complex it promised the neighbors would always only be for seniors into all low-income all age units. The seniors left because the PH projects made it a dangerous area to live.
- For many decades the overconcentration in this one small Sacramento area has

caused major problems for the project tenants, surrounding neighbors and taxpayers. This neighborhood became the most violent area in all of Sacramento in the early 90's.

- The evidence is clear. Placing too much public housing in one little area results in major problems: Overconcentration of poverty, substance abuse and other mental health disorders, child neglect, crime, delinquency, poor education, unemployment and many others. It's warehousing those in need.
- As reported the area around these two huge public housing projects crammed in this one little area of Sacramento has crime rates much higher than further away in the Land Park community. Using the online SACPD Lexus Nexis Community Crime Mapping analytics tool he types of crimes/events reported inside these housing projects were examined.. In the last year there were over 330 reported in the ½ mile radius including both Alder Grove and Marina Vista (aka Seavey Circle). The following is a list of those, many listed often, reported inside these two public housing projects in the last year: Vandalism, Possible Financial Crime, Missing Person, Take Vehicle W/O Owner, Possession/ Sales Opiates/Narcotics, Harassment, Child Custody, DUI , Access Card Fraud, AWDW – Non Firearm, Felony Possession Ammo, Gang Activity, Robbery, Possession Stolen Vehicle, Assault W/ Caustic Chemicals, Petty Theft, Battery Civilian, Willful Disobedience, Danger to Self/Others, Resisting Peace Officer, Harassment, Inflicting Injury on Child, Casualty Report, Burglary Vehicle, Burglary Residence/Forced, Trespassing After Notice, Violated Protective Order, Found Property, Brandish –Non Gun, Child Assault/Sex Activity, Towed Stored Vehicle, Theft – License Plate, Auto Theft Location, Trespassing/Prowler, Domestic Violence, Robbery – Purse Snatch, US Theft of Mail, Forcibly Steal/Take, Brandish Firearm, Arson of Inhabited Structure, Hit/Run Injury, Shooting in Occupied Dwelling. SACPD and others (e.g., UC Davis Study for SHRA) report that many crimes go unreported in the public housing for fear of retaliation, so these crime/event statistics are conservative. The police can only really mop up/react to the underlying problem – the overconcentration of poverty/public housing in one little area of Sacramento that has caused a bad environment to live in, and major and costly problems.
- 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> Some quicks takeaways: 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 public housing in any one area –overconcentration-creates communities with serious crime, health, education, and other major and costly problems that, in turn, further restrict the opportunities of those growing up and living in them. The impacts of neighborhood poverty rates on creating these problems increase rapidly if a neighborhood exceeds about 20 percent poverty.

Again, Sacramento must develop and implement a vision and plan to spread and integrate effective public and other affordable housing throughout Sacramento using fair share principles. Please don't leave both of these two huge PH projects crammed in this one small Sacramento area. Again, the overconcentration of public housing in this one little Sacramento area, and the resulting major and costly problems must be included in the EIR and CEQA . Alternatives must be developed to mitigate these major problems in this area/community.

As included in my July 25 written communication below, the Mayor of Sacramento says: "***It is unfair and ultimately unsuccessful to over concentrate any housing or social service effort in one or several neighborhoods.***"

The following is another assurance from the current Mayor that plans will be developed to evenly distribute public housing throughout Sacrament, not leave so much in the West Broadway, NWLP area. The decades of major and costly problems are well documented and agreed to by so many in public documentation. These facts must not be dismissed/overlooked.

From: MayorSacramento@mail.senecagov.com
[<mailto:MayorSacramento@mail.senecagov.com>]

Sent: Tuesday, January 23, 2018 3:38 PM

To: Craig Chaffee

Subject: Re: FW: Sent following letter to Bee editors to publish and posted on our Next Door site.

Luis Montes has responded:

Dear Craig Chaffee,

*Thank you for contacting Mayor Darrell Steinberg's Office. We appreciate your willingness to share your thoughts and concerns with our office and we have forwarded your comments to the appropriate City staff. **The mayor agrees, it is necessary to have even distribution of public housing in all eight districts throughout Sacramento** and in 2018, **the mayor's goal is to increase the capacity to create an environment that spurs the construction of more public and affordable housing throughout all of Sacramento.** If you have any additional questions or concerns on this topic please do not hesitate to ask.*

Thank you, again, for contacting our office. Mayor Steinberg appreciates hearing from you.

Sincerely,

Luis Montes

Director of Constituent Affairs

Office of Mayor Darrell Steinberg

LMontes@cityofsacramento.org

From: Chaffee, Craig (MHSD-FMOR)@DHCS

Sent: Wednesday, July 25, 2018 12:33 PM

To: 'Scott Johnson' <SRJohnson@cityofsacramento.org>

Cc: Genevive Taylor <semperfitaylor@sbcglobal.net>; Craig Chaffee <cjchaffee@comcast.net>; Tom Buford <TBuford@cityofsacramento.org>

Subject: RE: Input as resident in NWLP area where you are planning development.

Dear Mr. Johnson,

Thank you for your responsiveness. Since 1980 when my wife and I moved to the little neighborhood ("Upper Land Park) with the 2 huge failed past century government projects (e.g., Seavey Circle and Alder Grove) we have been assured many times by government officials (e.g. past SHRA Director) that they understood that concentrating so much poverty and public housing in one little area (warehousing) was a failed government practice, and that at least half of the existing public housing units crammed in this one tiny little Sac area must be moved/integrated into other Sac areas using fair share principles. Yet, push comes to shove and NIMBY, the 2 huge projects have been left here by government , with all the major and costly problems – decade after decade. Below is a direct communication from the Mayor's Office on the issue. Must hard working tax paying homeowners all leave –seek higher safer ground? Will the City ever actually make good on their promises, or just build more of the same here, put more lipstick on the pig, and give it some fancy new name (e.g., Seavey Estates)? Again thank you for anything you can do to help affect real positive change for this very fragile community you now called North West Land Park.

Hi Craig,

Thanks for writing to the Mayor about the concern a of overconcentration of public housing in Upper Land Park.

I understand what I say does not carry the weight of what Darrell says or what I may communicate his position to be. To that end, here are Darrell's thoughts on

the issue from him personally:

"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."

Warm regards,

**Kelly F. Rivas
Campaign Manager**

From: Scott Johnson <SRJohnson@cityofsacramento.org>
Sent: Wednesday, July 25, 2018 12:11 PM
To: Chaffee, Craig (MHSD-FMOR)@DHCS <Craig.Chaffee@dhcs.ca.gov>
Cc: Genevive Taylor <semperfitaylor@sbcglobal.net>; Craig Chaffee <cjchaffee@comcast.net>; Tom Buford <TBuford@cityofsacramento.org>
Subject: RE: Input as resident in NWLP area where you are planning development.

Dear Mr. Chaffee,

Thank you for your response to the Notice of Preparation (NOP) of an Environmental Impact Report for the West Broadway Specific Plan project. Your concerns will be included with responses and comments provided on the NOP to assist in the preparation of the draft environmental impact report.

Thank you,

Scott Johnson
City of Sacramento
Community Development Department
Environmental Planning Services
300 Richards Blvd., 3rd Floor
Sacramento, CA 95811
(916) 808-5842
srjohnson@cityofsacramento.org

From: Chaffee, Craig (MHSD-FMOR)@DHCS <Craig.Chaffee@dhcs.ca.gov>
Sent: Wednesday, July 25, 2018 12:01 PM

To: Scott Johnson <SRJohnson@cityofsacramento.org>
Cc: Genevive Taylor <semperfitaylor@sbcglobal.net>; Craig Chaffee <cjchaffee@comcast.net>
Subject: FW: Input as resident in NWLP area where you are planning development.

Dear Mr. Johnson,

I got the following email reply from Mr. Buford forwarding to you to make sure this was received “on time” for any community input deadline on this matter.

I am out of the office and will return Friday, August 3, 2018. If you need immediate assistance please contact Scott Johnson at srjohnson@cityofsacramento.org or phone at (916) 808-5842.

Thank You.

From: Chaffee, Craig (MHSD-FMOR)@DHCS
Sent: Wednesday, July 25, 2018 11:48 AM
To: 'tbuford@cityofsacramento.org' <tbuford@cityofsacramento.org>
Cc: 'Helen Selph' <HSelph@cityofsacramento.org>; 'Greg Sandlund' <GSandlund@cityofsacramento.org>; 'Genevive Taylor' <semperfitaylor@sbcglobal.net>; 'Craig Chaffee' <cjchaffee@comcast.net>
Subject: Input as resident in NWLP area where you are planning development.

Dear Mr. Buford,

I was planning on attending the City/consultant meeting tonight on West Broadway/NWLP planning. But as a still working senior citizen (and grandparent) I'm not sure I'll brave the heat, and attend in person. So I'm offering some input here as a LONG TERM resident of the area. I've communicated numerous times with Helen Selph too. I find her responsive and informative. Most appreciated! She can likely share previous communications. Below I try to focus on CEQA/EIR related concerns. I've included Art Taylor – Board Member on our Land Park Community Association. Mr. Taylor has been very involved in the public housing issues for a long time.

Helen Selph communicated to me about possible CEQA ‘Streamlining’ on this project: “Detailed evaluation of potential residential and mixed use projects proposed under the Northwest Land Park Specific Plan will expedite the approval process for future projects that are consistent with the Northwest Land Park Specific Plan. Depending on the characteristics of future projects, streamlining under the Northwest Land Park Specific Plan EIR may range from a complete exemption to preparation of a focused, project-specific environmental document. (Please note that due to Federal funding requirements, any re-development of Marina Vista and Alder Grove public housing properties will require additional environmental review, including

NEPA).”

My family has lived in the small surrounding fragile neighborhood since 1980.

I consulted a lawyer knowledgeable on CEQA/EIRs. The City and their consultants (partially hired because of their knowledge/experience on how to “fast track” CEQA/EIR reviews) should not try to use the ‘fair share affordable housing’ concept to fast track the CEQA/EIR reviews in an area already plagued with a gross over-concentration of public housing (PH) . That is political and hypocritical. That is not a correct use of the fair share concept for fast tracking CEQA/EIR reviews. Community has right to legally dispute the PH overconcentration /resulting community problems for decades using CEQA; such CEQA reviews can and should include socioeconomic issues too.

Here’s some main points for the City/consultants.

- My family and most neighbors support the principles of fair share affordable housing.
- However, City/consultants should not try to use the fair share affordable housing concept to fast track the CEQA/EIR review in an area already plagued with a gross over-concentration of PH. Instead the City/consultants should use the fair share principles and facts about the existing overconcentration of public housing in this one little area to support long term plans to spread PH and other affordable housing throughout City AND County, not to keep it over-concentrated in this one little area
- Related City Council Reports (e.g., April 3, 2018) on funding these consultants and working on this West Broadway/NWLP plan say “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.” The final plan must accomplish this equitable distribution of affordable housing throughout Sacramento, not over-concentrating it here.
- The State Office of Environmental Health Hazard Assessment (OEHHA) shows that this specific West Broadway/NWLP area of Sacramento is one of the most polluted areas and negatively impacted by socioeconomic challenges in the County AND State. The overconcentration of public housing in this area drives OEHHS’s very troubling rankings of high poverty and unemployment, This little Sac area contains over 44% of all of SHRA’s PH units in the ENTIRE City limits, one of the largest concentrations of PH anywhere in the Western United States.
- EACH of the 2 PH projects is, by far, the largest in the entire Sacramento area. This unhealthy overconcentration is the result of the failed last century government policy of cramming too much public housing in one place – based on racism, NIMBY by more powerful neighborhoods accepting NONE/ZERO, and political expediency. And, right next door to these two huge PH projects, the City/SHRA converted a 75 unit apartment complex it promised the neighbors would always only be for seniors into all

low-income all age units. The seniors left because the PH projects made it a dangerous area to live.

- For many decades the overconcentration in this one small Sacramento area has caused major problems for the project tenants, surrounding neighbors and taxpayers. This neighborhood became the most violent area in all of Sacramento in the early 90's.
- The evidence is clear. Placing too much public housing in one little area results in major problems: Overconcentration of poverty, substance abuse and other mental health disorders, child neglect, crime, delinquency, poor education, unemployment and many others. It's warehousing those in need.
- Sacramento must develop and implement a vision and plan to spread and integrate effective public and other affordable housing throughout Sacramento using fair share principles. Please don't leave both of these two huge PH projects crammed in this one small Sacramento area.

Thank You. I appreciate my comments being recorded/ added to community input, and concerns addressed/mitigated.

From: [Tom Buford](#)
To: [Chaffee, Craig \(MHSD-FMOR\)@DHCS](mailto:Chaffee,Craig(MHSD-FMOR)@DHCS)
Cc: ["Genevive Taylor"](#); [Craig Chaffee](#)
Subject: RE: Please include all of the following emails/information in the formal written record of public comment on the West Broadway/NWLP planning efforts and EIR and CEQA work specifically.
Date: Wednesday, August 8, 2018 8:21:00 AM

Mr. Chaffee:

Your several comments regarding the Notice of Preparation for the West Broadway Specific Plan are being logged as they are received.

Thank you for your interest in the project.

Tom

*Tom Buford, Manager
Environmental Planning Services
(916) 799-1531*

From: Chaffee, Craig (MHSD-FMOR)@DHCS <Craig.Chaffee@dhcs.ca.gov>
Sent: Tuesday, August 7, 2018 3:43 PM
To: Tom Buford <TBuford@cityofsacramento.org>
Cc: 'Genevive Taylor' <semperfitaylor@sbcglobal.net>; Craig Chaffee <cjchaffee@comcast.net>
Subject: RE: Please include all of the following emails/information in the formal written record of public comment on the West Broadway/NWLP planning efforts and EIR and CEQA work specifically.

Dear Mr. Buford,

Per Scott's out of office message, to make sure my public comment is received and logged by the City in time. Thank You..

From: Scott Johnson <SRJohnson@cityofsacramento.org>
Sent: Tuesday, August 7, 2018 3:38 PM
To: Chaffee, Craig (MHSD-FMOR)@DHCS <Craig.Chaffee@dhcs.ca.gov>
Subject: Automatic reply: Please include all of the following emails/information in the formal written record of public comment on the West Broadway/NWLP planning efforts and EIR and CEQA work specifically.

I am out of the office and will be returning on Thursday, August 16, 2018.

Please contact Tom Buford, Principal Planner at tbuford@cityofsacramento.org or (916) 799-1531 with any urgent questions.

Thank you.

From: Chaffee, Craig (MHSD-FMOR)@DHCS

Sent: Tuesday, August 7, 2018 3:38 PM

To: 'Scott Johnson' <SRJohnson@cityofsacramento.org>

Cc: 'Tom Buford' <TBuford@cityofsacramento.org>; 'Genevive Taylor' <semperfitaylor@sbcglobal.net>; 'Craig Chaffee' <cjchaffee@comcast.net>

Subject: RE: Please include all of the following emails/information in the formal written record of public comment on the West Broadway/NWLP planning efforts and EIR and CEQA work specifically.

Dear Mr. Johnson,

Please add the following to the public comments for the NWLP/West Broadway develop planning. Thanks as always for being inclusive and capturing public comment on this MAJOR Sacramento planning effort. I understand that the public comment period ends shortly.

The State Office of Environmental Health Hazard Assessment (OEHHA) shows that this specific West Broadway/NWLP area of Sacramento is one of the most polluted areas and negatively impacted by socioeconomic challenges in the County AND State. The overconcentration of public housing in this area drives OEHHS's very troubling rankings of high poverty and unemployment, This little Sac area contains over 44% (751) of all of SHRA's PH units in the ENTIRE City limits, one of the largest concentrations of PH anywhere in the Western United States. The failed Seavey Circle housing project (warehouses) crams so many children in need right next to the major I-5 freeway with all the air pollution, and next to the poorest performing elementary school in Sacramento for so many DECADES. This is unconscionable. What kind of real government leaders/public servants would do/allow this?

From: Chaffee, Craig (MHSD-FMOR)@DHCS

Sent: Thursday, August 2, 2018 9:32 AM

To: 'Scott Johnson' <SRJohnson@cityofsacramento.org>

Cc: Tom Buford <TBuford@cityofsacramento.org>; craig@eyeonsacramento.org; 'Genevive Taylor' <semperfitaylor@sbcglobal.net>; Craig Chaffee <cjchaffee@comcast.net>

Subject: RE: Please include all of the following emails/information in the formal written record of public comment on the West Broadway/NWLP planning efforts and EIR and CEQA work specifically.

Thank you again Mr. Johnson,

I thought you and your team might also be interested in the following email "string" and related article in the Sacramento Bee.

From: Chaffee, Craig (MHSD-FMOR)@DHCS

Sent: Thursday, March 8, 2018 12:39 PM

To: MayorSteinberg@cityofsacramento.org; shansen@cityofsacramento.org

Cc: 'Genevive Taylor' <semperfitaylor@sbcglobal.net>; Craig Chaffee

<cjchaffee@comcast.net>

Subject: JUST FYI: RE: Thank You. Read your great, informative article today in the local Sacramento Bee newspaper.

Sent email below to author of the following Bee article author today.

[CEQA isnt stopping affordable housing in California, it's protecting ...](http://www.sacbee.com/opinion/op-ed/soapbox/article203907234.html)

www.sacbee.com/opinion/op-ed/soapbox/article203907234.html

1 day ago - Developers point a finger at the California Environmental Quality Act as a key obstacle to building more **housing**. But today's streamlined **CEQA** protects **public** health and natural resources while giving voice to disadvantaged communities. ... **CEQA isn't stopping housing**, it's protecting health. By Allen ...

From: Chaffee, Craig (MHSD-FMOR)@DHCS

Sent: Thursday, March 8, 2018 12:29 PM

To: 'Allen.H@CCAIEJ.org' <Allen.H@CCAIEJ.org>

Cc: Craig Chaffee <cjchaffee@comcast.net>

Subject: Thank You. Read your great, informative article today in the local Sacramento Bee newspaper.

“CEQA isn’t stopping affordable housing” – Great work. Thank you.

My wife and I live in a little neighborhood in Sacramento CA. Many decades ago the City allowed over 44% of all public housing units in the City limits to be crammed in this one little neighborhood. This overconcentration of public housing in one little area is based on old failed past century practices, racism, NIMBY by the more powerful and affluent neighborhoods in Sacramento, developer greed and political expediency. Like you say in your article, falsehoods are substituted for facts. Most of these old dilapidated public housing units in Sacramento CA are also crammed right next to the I-5 Freeway. The area has some of the highest environmental risk/pollution scores in California. Now the City is seriously considering not only rebuilding all that public housing there, but doubling it on the same land. It doesn’t take a rocket scientist to tell you that such concentrated poverty, and next to a major California freeway, is unhealthy and harmful for that community and all those children. Neighbors try to convince the government and developers to spread such needed public housing out throughout Sacramento in a number of good neighborhoods with healthy environments using fair share principles, with not too much in any one neighborhood, but far more overall. Instead is the City government working with developers to

“streamline” the public review process (including CEQA issues) and fast track their new public housing development all crammed in this one area, doubled and left by the freeway pollution? There is also a petroleum refinery very nearby. Yet will the City move forward to “streamline” community input and review for development plans? Certainly fits with the facts and bad practices you communicate in your great article. Thank you for your important work and writings. We’re hoping that Sacramento and other leaders in California and our nation will read and learn from great communication like yours. Best to you and your family.

Craig Chaffee
Sacramento, CA

From: Scott Johnson <SRJohnson@cityofsacramento.org>
Sent: Thursday, August 2, 2018 7:51 AM
To: Craig Chaffee <cjchaffee@comcast.net>
Cc: Tom Buford <TBuford@cityofsacramento.org>; craig@eyeonsacramento.org; 'Genevive Taylor' <semperfitaylor@sbcglobal.net>; Chaffee, Craig (MHSD-FMOR)@DHCS <Craig.Chaffee@dhcs.ca.gov>
Subject: RE: Please include all of the following emails/information in the formal written record of public comment on the West Broadway/NWLP planning efforts and EIR and CEQA work specifically.

Dear Mr. Chaffee,

Thank you for your additional response to the Notice of Preparation (NOP) of an Environmental Impact Report for the West Broadway Specific Plan project. Your concerns will be included with responses and comments provided on the NOP to assist in the preparation of the draft environmental impact report.

Thank you again,

Scott Johnson
City of Sacramento
Community Development Department
Environmental Planning Services
300 Richards Blvd., 3rd Floor
Sacramento, CA 95811
(916) 808-5842
srjohnson@cityofsacramento.org

From: Craig Chaffee <cjchaffee@comcast.net>

Sent: Wednesday, August 1, 2018 5:19 PM

To: Scott Johnson <SRJohnson@cityofsacramento.org>

Cc: Tom Buford <TBuford@cityofsacramento.org>; craig@eyeonsacramento.org; 'Genevive Taylor' <semperfitaylor@sbcglobal.net>; Craig.Chaffee@dhcs.ca.gov

Subject: Please include all of the following emails/information in the formal written record of public comment on the West Broadway/NWLP planning efforts and EIR and CEQA work specifically.

Dear Mr. Johnson. City West Broadway/NWLP Area Planning team,

It is my understanding that public input on the “West Broadway/Northwest Land Park Plan project work related to the EIR and CEQA are still being accepted.

Please include/record this email and all its contents in the community/public input for this planning project and related EIR and CEQA work.

Please make sure to address and plan to mitigate the related issues in your EIR and CEQA work.

Please let me know if you have any questions/etc. My family and so many others in this community strive for a much safer community and environment free from such hazards to live in and raise our families. Thank You.

Again, I've been advised by a lawyer very knowledgeable in such law/subject matter that CEQA covers socioeconomic impacts; there is authority that they're covered. The following 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 4 of the Environmental Handbook](http://www.dot.ca.gov/ser/vol1/sec5/ch36eir/chap36.htm#required), for example: <http://www.dot.ca.gov/ser/vol1/sec5/ch36eir/chap36.htm#required>

As state below to your office on July 25, 2018 (in email below):

- The State Office of Environmental Health Hazard Assessment (OEHHA) shows that this specific West Broadway/NWLP area of Sacramento is one of the most polluted areas and negatively impacted by socioeconomic challenges in the County AND State. The overconcentration of public housing in this area drives

OEHHS's very troubling rankings of high poverty and unemployment, This little Sac area contains over 44% of all of SHRA's PH units in the ENTIRE City limits, one of the largest concentrations of PH anywhere in the Western United States.

- EACH of the 2 public housing projects in this area is, by far, the largest in the entire Sacramento area. This unhealthy overconcentration is the result of the failed last century government policy of cramming too much public housing in one place – based on racism, NIMBY by more powerful neighborhoods accepting NONE/ZERO, and political expediency. And, right next door to these two huge PH projects, the City/SHRA converted a 75 unit apartment complex it promised the neighbors would always only be for seniors into all low-income all age units. The seniors left because the PH projects made it a dangerous area to live.
- For many decades the overconcentration in this one small Sacramento area has caused major problems for the project tenants, surrounding neighbors and taxpayers. This neighborhood became the most violent area in all of Sacramento in the early 90's.
- The evidence is clear. Placing too much public housing in one little area results in major problems: Overconcentration of poverty, substance abuse and other mental health disorders, child neglect, crime, delinquency, poor education, unemployment and many others. It's warehousing those in need.
- As reported the area around these two huge public housing projects crammed in this one little area of Sacramento has crime rates much higher than further away in the Land Park community. Using the online SACPD Lexus Nexis Community Crime Mapping analytics tool the types of crimes/events reported inside these housing projects were examined.. In the last year there were over 330 reported in the ½ mile radius including both Alder Grove and Marina Vista (aka Seavey Circle). The following is a list of those, many listed often, reported inside these two public housing projects in the last year: Vandalism, Possible Financial Crime, Missing Person, Take Vehicle W/O Owner, Possession/ Sales Opiates/Narcotics, Harassment, Child Custody, DUI , Access Card Fraud, AWDW – Non Firearm, Felony Possession Ammo, Gang Activity, Robbery, Possession Stolen Vehicle, Assault W/ Caustic Chemicals, Petty Theft, Battery Civilian, Willful Disobedience, Danger to Self/Others, Resisting Peace Officer, Harassment, Inflicting Injury on Child, Casualty Report, Burglary Vehicle, Burglary Residence/Forced, Trespassing After Notice, Violated Protective Order, Found Property, Brandish –Non Gun, Child Assault/Sex Activity, Towed Stored Vehicle, Theft – License Plate, Auto Theft Location, Trespassing/Prowler, Domestic Violence, Robbery – Purse Snatch, US Theft of Mail, Forcibly Steal/Take, Brandish Firearm, Arson of Inhabited Structure, Hit/Run Injury, Shooting in Occupied Dwelling. SACPD and others (e.g., UC Davis Study for SHRA) report that many crimes go unreported in the public housing for fear of retaliation, so these crime/event statistics are conservative. The police can only really mop up/react to the underlying problem – the overconcentration of

poverty/public housing in one little area of Sacramento that has caused a bad environment to live in, and major and costly problems.

- 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> Some quick takeaways: 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 public housing in any one area –overconcentration-creates communities with serious crime, health, education, and other major and costly problems that, in turn, further restrict the opportunities of those growing up and living in them. The impacts of neighborhood poverty rates on creating these problems increase rapidly if a neighborhood exceeds about 20 percent poverty.

Again, Sacramento must develop and implement a vision and plan to spread and integrate effective public and other affordable housing throughout Sacramento using fair share principles. Please don't leave both of these two huge PH projects crammed in this one small Sacramento area. Again, the overconcentration of public housing in this one little Sacramento area, and the resulting major and costly problems must be included in the EIR and CEQA . Alternatives must be developed to mitigate these major problems in this area/community.

As included in my July 25 written communication below, the Mayor of Sacramento says: ***"It is unfair and ultimately unsuccessful to over concentrate any housing or social service effort in one or several neighborhoods."***

The following is another assurance from the current Mayor that plans will be developed to evenly distribute public housing throughout Sacramento, not leave so much in the West Broadway, NWLP area. The decades of major and costly problems are well documented and agreed to by so many in public documentation. These facts must not be dismissed/overlooked.

From: MayorSacramento@mail.senecagov.com
[<mailto:MayorSacramento@mail.senecagov.com>]

Sent: Tuesday, January 23, 2018 3:38 PM

To: Craig Chaffee

Subject: Re: FW: Sent following letter to Bee editors to publish and posted on our Next Door site.

Luis Montes has responded:

Dear Craig Chaffee,

*Thank you for contacting Mayor Darrell Steinberg's Office. We appreciate your willingness to share your thoughts and concerns with our office and we have forwarded your comments to the appropriate City staff. **The mayor agrees, it is necessary to have even distribution of public housing in all eight districts throughout Sacramento** and in 2018, **the mayor's goal is to increase the capacity to create an environment that spurs the construction of more public and affordable housing throughout all of Sacramento.** If you have any additional questions or concerns on this topic please do not hesitate to ask.*

Thank you, again, for contacting our office. Mayor Steinberg appreciates hearing from you.

Sincerely,

Luis Montes

Director of Constituent Affairs

Office of Mayor Darrell Steinberg

LMontes@cityofsacramento.org

From: Chaffee, Craig (MHSD-FMOR)@DHCS

Sent: Wednesday, July 25, 2018 12:33 PM

To: 'Scott Johnson' <SRJohnson@cityofsacramento.org>

Cc: Genevive Taylor <semperfitaylor@sbcglobal.net>; Craig Chaffee <cjchaffee@comcast.net>; Tom Buford <TBuford@cityofsacramento.org>

Subject: RE: Input as resident in NWLP area where you are planning development.

Dear Mr. Johnson,

Thank you for your responsiveness. Since 1980 when my wife and I moved to the little neighborhood ("Upper Land Park) with the 2 huge failed past century government projects (e.g., Seavey Circle and Alder Grove) we have been assured many times by government officials (e.g. past SHRA Director) that they understood that concentrating so much poverty and public housing in one little area (warehousing) was a failed government practice, and that at least half of the existing public housing units crammed in this one tiny little Sac area must be moved/integrated into other Sac areas using fair share principles. Yet, push comes to shove and NIMBY, the 2 huge projects have been left here by government , with all

the major and costly problems – decade after decade. Below is a direct communication from the Mayor's Office on the issue. Must hard working tax paying homeowners all leave –seek higher safer ground? Will the City ever actually make good on their promises, or just build more of the same here, put more lipstick on the pig, and give it some fancy new name (e.g., Seavey Estates)? Again thank you for anything you can do to help affect real positive change for this very fragile community you now called North West Land Park.

Hi Craig,

Thanks for writing to the Mayor about the concern a of overconcentration of public housing in Upper Land Park.

I understand what I say does not carry the weight of what Darrell says or what I may communicate his position to be. To that end, here are Darrell's thoughts on the issue from him personally:

"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."

Warm regards,

**Kelly F. Rivas
Campaign Manager**

From: Scott Johnson <SRJohnson@cityofsacramento.org>
Sent: Wednesday, July 25, 2018 12:11 PM
To: Chaffee, Craig (MHSD-FMOR)@DHCS <Craig.Chaffee@dhcs.ca.gov>
Cc: Genevive Taylor <semperfitaylor@sbcglobal.net>; Craig Chaffee <cjchaffee@comcast.net>; Tom Buford <TBuford@cityofsacramento.org>
Subject: RE: Input as resident in NWLP area where you are planning development.

Dear Mr. Chaffee,

Thank you for your response to the Notice of Preparation (NOP) of an Environmental Impact Report for the West Broadway Specific Plan project. Your concerns will be included with responses and comments provided on the NOP to assist in the preparation of the draft environmental impact report.

Thank you,

Scott Johnson
City of Sacramento
Community Development Department
Environmental Planning Services
300 Richards Blvd., 3rd Floor
Sacramento, CA 95811
(916) 808-5842
srjohnson@cityofsacramento.org

From: Chaffee, Craig (MHSD-FMOR)@DHCS <Craig.Chaffee@dhcs.ca.gov>
Sent: Wednesday, July 25, 2018 12:01 PM
To: Scott Johnson <SRJohnson@cityofsacramento.org>
Cc: Genevive Taylor <semperfitaylor@sbcglobal.net>; Craig Chaffee <cjchaffee@comcast.net>
Subject: FW: Input as resident in NWLP area where you are planning development.

Dear Mr. Johnson,

I got the following email reply from Mr. Buford forwarding to you to make sure this was received "on time" for any community input deadline on this matter.

I am out of the office and will return Friday, August 3, 2018. If you need immediate assistance please contact Scott Johnson at srjohnson@cityofsacramento.org or phone at (916) 808-5842.

Thank You.

From: Chaffee, Craig (MHSD-FMOR)@DHCS
Sent: Wednesday, July 25, 2018 11:48 AM
To: 'tbuford@cityofsacramento.org' <tbuford@cityofsacramento.org>
Cc: 'Helen Selph' <HSelph@cityofsacramento.org>; 'Greg Sandlund' <GSandlund@cityofsacramento.org>; 'Genevive Taylor' <semperfitaylor@sbcglobal.net>; 'Craig Chaffee' <cjchaffee@comcast.net>
Subject: Input as resident in NWLP area where you are planning development.

Dear Mr. Buford,

I was planning on attending the City/consultant meeting tonight on West Broadway/NWLP planning. But as a still working senior citizen (and grandparent) I'm

not sure I'll brave the heat, and attend in person. So I'm offering some input here as a LONG TERM resident of the area. I've communicated numerous times with Helen Selph too. I find her responsive and informative. Most appreciated! She can likely share previous communications. Below I try to focus on CEQA/EIR related concerns. I've included Art Taylor – Board Member on our Land Park Community Association. Mr. Taylor has been very involved in the public housing issues for a long time.

Helen Selph communicated to me about possible CEQA 'Streamlining' on this project: "Detailed evaluation of potential residential and mixed use projects proposed under the Northwest Land Park Specific Plan will expedite the approval process for future projects that are consistent with the Northwest Land Park Specific Plan. Depending on the characteristics of future projects, streamlining under the Northwest Land Park Specific Plan EIR may range from a complete exemption to preparation of a focused, project-specific environmental document. (Please note that due to Federal funding requirements, any re-development of Marina Vista and Alder Grove public housing properties will require additional environmental review, including NEPA)."

My family has lived in the small surrounding fragile neighborhood since 1980.

I consulted a lawyer knowledgeable on CEQA/EIRs. The City and their consultants (partially hired because of their knowledge/experience on how to "fast track" CEQA/EIR reviews) should not try to use the 'fair share affordable housing' concept to fast track the CEQA/EIR reviews in an area already plagued with a gross over-concentration of public housing (PH). That is political and hypocritical. That is not a correct use of the fair share concept for fast tracking CEQA/EIR reviews. Community has right to legally dispute the PH overconcentration /resulting community problems for decades using CEQA; such CEQA reviews can and should include socioeconomic issues too.

Here's some main points for the City/consultants.

- My family and most neighbors support the principles of fair share affordable housing.
- However, City/consultants should not try to use the fair share affordable housing concept to fast track the CEQA/EIR review in an area already plagued with a gross over-concentration of PH. Instead the City/consultants should use the fair share principles and facts about the existing overconcentration of public housing in this one little area to support long term plans to spread PH and other affordable housing throughout City AND County, not to keep it over-concentrated in this one little area
- Related City Council Reports (e.g., April 3, 2018) on funding these consultants and working on this West Broadway/NWLP plan say "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." The final plan must accomplish this equitable distribution of affordable housing throughout Sacramento, not over-concentrating it

here.

- The State Office of Environmental Health Hazard Assessment (OEHHA) shows that this specific West Broadway/NWLP area of Sacramento is one of the most polluted areas and negatively impacted by socioeconomic challenges in the County AND State. The overconcentration of public housing in this area drives OEHHA's very troubling rankings of high poverty and unemployment. This little Sac area contains over 44% of all of SHRA's PH units in the ENTIRE City limits, one of the largest concentrations of PH anywhere in the Western United States.
- EACH of the 2 PH projects is, by far, the largest in the entire Sacramento area. This unhealthy overconcentration is the result of the failed last century government policy of cramming too much public housing in one place – based on racism, NIMBY by more powerful neighborhoods accepting NONE/ZERO, and political expediency. And, right next door to these two huge PH projects, the City/SHRA converted a 75 unit apartment complex it promised the neighbors would always only be for seniors into all low-income all age units. The seniors left because the PH projects made it a dangerous area to live.
- For many decades the overconcentration in this one small Sacramento area has caused major problems for the project tenants, surrounding neighbors and taxpayers. This neighborhood became the most violent area in all of Sacramento in the early 90's.
- The evidence is clear. Placing too much public housing in one little area results in major problems: Overconcentration of poverty, substance abuse and other mental health disorders, child neglect, crime, delinquency, poor education, unemployment and many others. It's warehousing those in need.
- Sacramento must develop and implement a vision and plan to spread and integrate effective public and other affordable housing throughout Sacramento using fair share principles. Please don't leave both of these two huge PH projects crammed in this one small Sacramento area.

Thank You. I appreciate my comments being recorded/ added to community input, and concerns addressed/mitigated.



Central Valley Regional Water Quality Control Board

COMMUNITY DEVELOPMENT DEPARTMENT

3 August 2018

AUG 6 2018

Tom Buford
City of Sacramento
300 Richard Boulevard, 3rd Floor
Sacramento, CA 95816

CERTIFIED MAIL RECEIVED
91 7199 9991 7039 6992 6441

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

Pursuant to the State Clearinghouse's 12 July 2018 request, the Central Valley Regional Water Quality Control Board (Central Valley Water Board) has reviewed the Request for Review for the Notice of Preparation for the Draft Environment 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.

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 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,

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

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/.

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 Policy is available on page IV-15.01 at:
http://www.waterboards.ca.gov/centralvalleywater_issues/basin_plans/sacsjr.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) Permits¹

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

Industrial Storm Water General Permit

Storm water discharges associated with industrial sites must comply with the regulations contained in the Industrial Storm Water General Permit Order No. 2014-0057-DWQ.

For more information on the Industrial Storm Water General Permit, visit the Central Valley Water Board website at:

http://www.waterboards.ca.gov/centralvalley/water_issues/storm_water/industrial_general_permits/index.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 (USACOE). If a Section 404 permit is required by the USACOE, 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

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.

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 USACOE at (916) 557-5250.

Clean Water Act Section 401 Permit – Water Quality Certification

If an USACOE 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.

Waste Discharge Requirements – Discharges to Waters of the State

If USACOE 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 Water Quality Certification and WDR processes, visit the Central Valley Water Board website at:

http://www.waterboards.ca.gov/centralvalley/help/business_help/permit2.shtml.

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:

http://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2003/wqo/wqo2003-0003.pdf

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

http://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/waivers/r5-2013-0145_res.pdf

Regulatory Compliance for Commercially Irrigated Agriculture

If the property will be used for commercial irrigated agricultural, the discharger will be required to obtain regulatory coverage under the Irrigated Lands Regulatory Program. There are two options to comply:

1. **Obtain Coverage Under a Coalition Group.** Join the local Coalition Group that supports land owners with the implementation of the Irrigated Lands Regulatory Program. The Coalition Group conducts water quality monitoring and reporting to the Central Valley Water Board on behalf of its growers. The Coalition Groups charge an annual membership fee, which varies by Coalition Group. To find the Coalition Group in your area, visit the Central Valley Water Board's website at: http://www.waterboards.ca.gov/centralvalley/water_issues/irrigated_lands/for_growers/apply_coalition_group/index.shtml or contact water board staff at (916) 464-4611 or via email at IrrLands@waterboards.ca.gov.
2. **Obtain Coverage Under the General Waste Discharge Requirements for Individual Growers, General Order R5-2013-0100.** Dischargers not participating in a third-party group (Coalition) are regulated individually. Depending on the specific site conditions, growers may be required to monitor runoff from their property, install monitoring wells, and submit a notice of intent, farm plan, and other action plans regarding their actions to comply with their General Order. Yearly costs would include State administrative fees (for example, annual fees for farm sizes from 10-100 acres are currently \$1,084 + \$6.70/Acre); the cost to prepare annual monitoring reports; and water quality monitoring costs. To enroll as an Individual Discharger under the Irrigated Lands Regulatory Program, call the Central Valley Water Board phone line at (916) 464-4611 or e-mail board staff at IrrLands@waterboards.ca.gov.

Low or 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 *Dewatering and Other Low Threat Discharges to Surface Waters* (Low Threat General Order) or the General Order for *Limited Threat Discharges of Treated/Untreated Groundwater from Cleanup Sites, Wastewater from Superchlorination Projects, and Other Limited Threat Wastewaters to Surface Water* (Limited Threat General Order). A complete application must be submitted to the Central Valley Water Board to obtain coverage under these General NPDES permits.

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

http://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/general_orders/r5-2013-0074.pdf

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

http://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/general_orders/r5-2013-0073.pdf

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:

http://www.waterboards.ca.gov/centralvalley/help/business_help/permit3.shtml

If you have questions regarding these comments, please contact me at (916) 464-4644 or Stephanie.Tadlock@waterboards.ca.gov.



Stephanie Tadlock
Senior Environmental Scientist

cc: State Clearinghouse unit, Governor's Office of Planning and Research, Sacramento

NATIVE AMERICAN HERITAGE COMMISSION

Environmental and Cultural Department
1550 Harbor Blvd., Suite 100
West Sacramento, CA 95691
Phone (916) 373-3710
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COMMUNITY DEVELOPMENT
DEPARTMENT

AUG 6 2018

RECEIVED

July 30, 2018

Tom Buford
City of Sacramento
300 Richards Blvd, 3rd Floor
Sacramento, CA 95816

RE: SCH#2018072032, West Broadway Specific Plan, Sacramento County

Dear Mr. Buford:

The Native American Heritage Commission has received the Notice of Preparation (NOP) for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code § 21000 et seq.), specifically Public Resources Code section 21084.1, states that a project that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, § 15064.5 (b) (CEQA Guidelines Section 15064.5 (b)). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an environmental impact report (EIR) shall be prepared. (Pub. Resources Code § 21080 (d); Cal. Code Regs., tit. 14, § 15064 subd.(a)(1) (CEQA Guidelines § 15064 (a)(1)). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources with the area of project effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code § 21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code § 21084.3 (a)). **AB 52 applies to any project for which a notice of preparation or a notice of negative declaration or mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements.** If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. § 800 et seq.) may also apply.

The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments. **Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.**

AB 52

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project: Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:

- a. A brief description of the project.
 - b. The lead agency contact information.
 - c. Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code § 21080.3.1 (d)).
 - d. A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code § 21073).
2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report: A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code § 21080.3.1, subds. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or environmental impact report. (Pub. Resources Code § 21080.3.1(b)).
- a. For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code § 65352.4 (SB 18). (Pub. Resources Code § 21080.3.1 (b)).
3. Mandatory Topics of Consultation If Requested by a Tribe: The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:
- a. Alternatives to the project.
 - b. Recommended mitigation measures.
 - c. Significant effects. (Pub. Resources Code § 21080.3.2 (a)).
4. Discretionary Topics of Consultation: The following topics are discretionary topics of consultation:
- a. Type of environmental review necessary.
 - b. Significance of the tribal cultural resources.
 - c. Significance of the project's impacts on tribal cultural resources.
 - d. If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code § 21080.3.2 (a)).
5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process: With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code sections 6254 (r) and 6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code § 21082.3 (c)(1)).
6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document: If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:
- a. Whether the proposed project has a significant impact on an identified tribal cultural resource.
 - b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code section 21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code § 21082.3 (b)).
7. Conclusion of Consultation: Consultation with a tribe shall be considered concluded when either of the following occurs:
- a. The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
 - b. A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code § 21080.3.2 (b)).
8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document: Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code section 21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation

monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code section 21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code § 21082.3 (a)).

9. Required Consideration of Feasible Mitigation: If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code section 21084.3 (b). (Pub. Resources Code § 21082.3 (e)).
10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:
 - a. Avoidance and preservation of the resources in place, including, but not limited to:
 - i. Planning and construction to avoid the resources and protect the cultural and natural context.
 - ii. Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
 - b. Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
 - i. Protecting the cultural character and integrity of the resource.
 - ii. Protecting the traditional use of the resource.
 - iii. Protecting the confidentiality of the resource.
 - c. Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
 - d. Protecting the resource. (Pub. Resource Code § 21084.3 (b)).
 - e. Please note that a federally recognized California Native American tribe or a nonfederally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code § 815.3 (c)).
 - f. Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code § 5097.991).
11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource: An environmental impact report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:
 - a. The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code sections 21080.3.1 and 21080.3.2 and concluded pursuant to Public Resources Code section 21080.3.2.
 - b. The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
 - c. The lead agency provided notice of the project to the tribe in compliance with Public Resources Code section 21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code § 21082.3 (d)).

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf

SB 18

SB 18 applies to local governments and requires local governments to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code § 65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf

Some of SB 18's provisions include:

1. **Tribal Consultation:** If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code § 65352.3 (a)(2)).
2. **No Statutory Time Limit on SB 18 Tribal Consultation.** There is no statutory time limit on SB 18 tribal consultation.
3. **Confidentiality:** Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code section 65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code sections 5097.9 and 5097.993 that are within the city's or county's jurisdiction. (Gov. Code § 65352.3 (b)).
4. **Conclusion of SB 18 Tribal Consultation:** Consultation should be concluded at the point in which:
 - a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
 - b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: <http://nahc.ca.gov/resources/forms/>

NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center (http://ohp.parks.ca.gov/?page_id=1068) for an archaeological records search. The records search will determine:
 - a. If part or all of the APE has been previously surveyed for cultural resources.
 - b. If any known cultural resources have been already been recorded on or adjacent to the APE.
 - c. If the probability is low, moderate, or high that cultural resources are located in the APE.
 - d. If a survey is required to determine whether previously unrecorded cultural resources are present.
2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
 - a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.
 - b. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.
3. Contact the NAHC for:
 - a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
 - b. A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.

4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.
- a. Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, section 15064.5(f) (CEQA Guidelines section 15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
 - b. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
 - c. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code section 7050.5, Public Resources Code section 5097.98, and Cal. Code Regs., tit. 14, section 15064.5, subdivisions (d) and (e) (CEQA Guidelines section 15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

If you have any questions, please contact me at my email address: Sharaya.Souza@nahc.ca.gov.

Sincerely,



Sharaya Souza
Staff Services Analyst
(916) 573-0168

cc: State Clearinghouse

Date	Commenter	
Agencies		
7/11/18; 8/13/18	PG&E	PG&E Plan Review Step-by-Step Guide and information on gas and electric facilities
7/30/18	Native American Heritage Commission	Information on AB 52 and SB 18
8/3/18	CVRWQCB	Applicable regulations and permitting requirements
8/6/18	Sacramento Metropolitan Air Quality Management District (SMAQMD)	Recommendations for AQ analysis
8/8/18	Caltrans	Forecasting/traffic operations; runoff onto the State's highway right-of-way and/or Caltrans drainage; encroachment permits; 1-5 Subregional Corridor Mitigation Programs
8/13/18	SMUD	Potential impacts to SMUD facilities, including the 21kV system
Organizations		
8/10/18	Preservation Sacramento	
8/13/18	SacModern	
Individuals		
7/25/18 (3); 8/1/18 (2); 8/2/18 (3); 8/7/18 (2); 8/8/18 (2)	Craig Chaffee	
7/25/18; 8/2/18; 8/7/18; 8/8/18	Genevive Taylor	

Date	Commenter	Summary
Agencies		
7/11/18; 8/13/18	PG&E	PG&E Plan Review Step-by-Step Guide and information on gas and electric facilities
7/30/18	Native American Heritage Commission	Information on AB 52 and SB 18
8/3/18	CVRWQCB	Applicable regulations and permitting requirements
8/6/18	Sacramento Metropolitan Air Quality Management District (SMAQMD)	Recommendations for AQ analysis
8/8/18	Caltrans	Forecasting/traffic operations; runoff onto the State's highway right-of-way and/or Caltrans drainage; encroachment permits; 1-5 Subregional Corridor Mitigation Programs
8/13/18	SMUD	Potential impacts to SMUD facilities, including the 21kV system
Organizations		
8/10/18	Preservation Sacramento	Potential to affect listed and identified historic resources
8/13/18	SacModern	Concern with identified and eligible historic resources.
Individuals		
7/25/18 (3); 8/1/18 (2); 8/2/18 (3); 8/7/18 (2); 8/8/18 (2)	Craig Chaffee	Land Use, Pop & Housing issues Hazards concerns Location of public housing
7/25/18; 8/2/18; 8/7/18; 8/8/18	Genevive Taylor	Concerns related to public housing

From: [PGE Plan Review](#)
To: [Tom Buford](#)
Subject: West Broadway Specific Plan: Notice of Preparation
Date: Wednesday, July 11, 2018 3:46:42 PM
Attachments: [Initial Response Letter 7.11.2018.pdf](#)
[PGE Plan Review StepbyStep Guide 20180411.pdf](#)

Dear Mr. Buford,

Thank you for submitting the West Broadway Specific Plan: Notice of Preparation plans. The PGE Plan Review Team is currently reviewing the information provided. We will respond to you with project specific comments prior to the provided deadline. Attached is general information regarding PGE facilities and the PGE Plan Review Step-by-Step Guide for your reference.

Please forward future planning documents (per Step 1 of the Guide) which include, but are not limited to, Environmental Documents, subdivision maps, general City/County plans to pgeplanreview@pge.com or mail to the following address below:

611 Bollinger Canyon Road, 3rd Floor
Mail Code: BR1Y3A
San Ramon, CA 94583

This email and attachment does not constitute PG&E's consent to use any portion of its easement for any purpose not previously conveyed.

Thank you,

Plan Review Team
6111 Bollinger Canyon Rd., 3rd Floor
Mail Code BR1Y3A
San Ramon, CA 94583
pgeplanreview@pge.com

*****This is a notification email only. Please do not reply to this message.***



July 11, 2018

Tom Buford
Community Development Department
City of Sacramento
300 Richards Blvd., 3rd Floor
Sacramento, CA 95811

Ref: Gas and Electric Transmission and Distribution

Dear Mr. Buford,

Thank you for submitting West Broadway plans for our review. PG&E will review the submitted plans in relationship to any existing Gas and Electric facilities within the project area. If the proposed project is adjacent/or within PG&E owned property and/or easements, we will be working with you to ensure compatible uses and activities near our facilities.

Attached you will find information and requirements as it relates to Gas facilities (Attachment 1) and Electric facilities (Attachment 2). Please review these in detail, as it is critical to ensure your safety and to protect PG&E's facilities and its existing rights.

Below is additional information for your review:

1. This plan review process does not replace the application process for PG&E gas or electric service your project may require. For these requests, please continue to work with PG&E Service Planning: https://www.pge.com/en_US/business/services/building-and-renovation/overview/overview.page.
2. If the project being submitted is part of a larger project, please include the entire scope of your project, and not just a portion of it. PG&E's facilities are to be incorporated within any CEQA document. PG&E needs to verify that the CEQA document will identify any required future PG&E services.
3. An engineering deposit may be required to review plans for a project depending on the size, scope, and location of the project and as it relates to any rearrangement or new installation of PG&E facilities.

Any proposed uses within the PG&E fee strip and/or easement, may include a California Public Utility Commission (CPUC) Section 851 filing. This requires the CPUC to render approval for a conveyance of rights for specific uses on PG&E's fee strip or easement. PG&E will advise if the necessity to incorporate a CPUC Section 851 filing is required.

This letter does not constitute PG&E's consent to use any portion of its easement for any purpose not previously conveyed. PG&E will provide a project specific response as required.

Sincerely,

Plan Review Team
Land Management



Attachment 1 – Gas Facilities

There could be gas transmission pipelines in this area which would be considered critical facilities for PG&E and a high priority subsurface installation under California law. Care must be taken to ensure safety and accessibility. So, please ensure that if PG&E approves work near gas transmission pipelines it is done in adherence with the below stipulations. Additionally, the following link provides additional information regarding legal requirements under California excavation laws: <http://usanorth811.org/wp-content/uploads/2017/05/CA-LAW-English.pdf>

1. **Standby Inspection:** A PG&E Gas Transmission Standby Inspector must be present during any demolition or construction activity that comes within 10 feet of the gas pipeline. This includes all grading, trenching, substructure depth verifications (potholes), asphalt or concrete demolition/removal, removal of trees, signs, light poles, etc. This inspection can be coordinated through the Underground Service Alert (USA) service at 811. A minimum notice of 48 hours is required. Ensure the USA markings and notifications are maintained throughout the duration of your work.
2. **Access:** At any time, PG&E may need to access, excavate, and perform work on the gas pipeline. Any construction equipment, materials, or spoils may need to be removed upon notice. Any temporary construction fencing installed within PG&E's easement would also need to be capable of being removed at any time upon notice. Any plans to cut temporary slopes exceeding a 1:4 grade within 10 feet of a gas transmission pipeline need to be approved by PG&E Pipeline Services in writing PRIOR to performing the work.
3. **Wheel Loads:** To prevent damage to the buried gas pipeline, there are weight limits that must be enforced whenever any equipment gets within 10 feet of traversing the pipe.

Ensure a list of the axle weights of all equipment being used is available for PG&E's Standby Inspector. To confirm the depth of cover, the pipeline may need to be potholed by hand in a few areas.

Due to the complex variability of tracked equipment, vibratory compaction equipment, and cranes, PG&E must evaluate those items on a case-by-case basis prior to use over the gas pipeline (provide a list of any proposed equipment of this type noting model numbers and specific attachments).

No equipment may be set up over the gas pipeline while operating. Ensure crane outriggers are at least 10 feet from the centerline of the gas pipeline. Transport trucks must not be parked over the gas pipeline while being loaded or unloaded.

4. **Grading:** PG&E requires a minimum of 36 inches of cover over gas pipelines (or existing grade if less) and a maximum of 7 feet of cover at all locations. The graded surface cannot exceed a cross slope of 1:4.
5. **Excavating:** Any digging within 2 feet of a gas pipeline must be dug by hand. Note that while the minimum clearance is only 12 inches, any excavation work within 24 inches of the edge of a pipeline must be done with hand tools. So to avoid having to dig a trench entirely with hand tools, the edge of the trench must be over 24 inches away. (Doing the math for a 24 inch wide trench being dug along a 36 inch pipeline, the centerline of the trench would need to be at least 54 inches [$24/2 + 24 + 36/2 = 54$] away, or be entirely dug by hand.)



Water jetting to assist vacuum excavating must be limited to 1000 psig and directed at a 40° angle to the pipe. All pile driving must be kept a minimum of 3 feet away.

Any plans to expose and support a PG&E gas transmission pipeline across an open excavation need to be approved by PG&E Pipeline Services in writing PRIOR to performing the work.

6. Boring/Trenchless Installations: PG&E Pipeline Services must review and approve all plans to bore across or parallel to (within 10 feet) a gas transmission pipeline. There are stringent criteria to pothole the gas transmission facility at regular intervals for all parallel bore installations.

For bore paths that cross gas transmission pipelines perpendicularly, the pipeline must be potholed a minimum of 2 feet in the horizontal direction of the bore path and a minimum of 12 inches in the vertical direction from the bottom of the pipe with minimum clearances measured from the edge of the pipe in both directions. Standby personnel must watch the locator trace (and every ream pass) the path of the bore as it approaches the pipeline and visually monitor the pothole (with the exposed transmission pipe) as the bore traverses the pipeline to ensure adequate clearance with the pipeline. The pothole width must account for the inaccuracy of the locating equipment.

7. Substructures: All utility crossings of a gas pipeline should be made as close to perpendicular as feasible (90° +/- 15°). All utility lines crossing the gas pipeline must have a minimum of 12 inches of separation from the gas pipeline. Parallel utilities, pole bases, water line 'kicker blocks', storm drain inlets, water meters, valves, back pressure devices or other utility substructures are not allowed in the PG&E gas pipeline easement.

If previously retired PG&E facilities are in conflict with proposed substructures, PG&E must verify they are safe prior to removal. This includes verification testing of the contents of the facilities, as well as environmental testing of the coating and internal surfaces. Timelines for PG&E completion of this verification will vary depending on the type and location of facilities in conflict.

8. Structures: No structures are to be built within the PG&E gas pipeline easement. This includes buildings, retaining walls, fences, decks, patios, carports, septic tanks, storage sheds, tanks, loading ramps, or any structure that could limit PG&E's ability to access its facilities.

9. Fencing: Permanent fencing is not allowed within PG&E easements except for perpendicular crossings which must include a 16 foot wide gate for vehicular access. Gates will be secured with PG&E corporation locks.

10. Landscaping: Landscaping must be designed to allow PG&E to access the pipeline for maintenance and not interfere with pipeline coatings or other cathodic protection systems. No trees, shrubs, brush, vines, and other vegetation may be planted within the easement area. Only those plants, ground covers, grasses, flowers, and low-growing plants that grow unsupported to a maximum of four feet (4') in height at maturity may be planted within the easement area.

11. Cathodic Protection: PG&E pipelines are protected from corrosion with an "Impressed Current" cathodic protection system. Any proposed facilities, such as metal conduit, pipes,



service lines, ground rods, anodes, wires, etc. that might affect the pipeline cathodic protection system must be reviewed and approved by PG&E Corrosion Engineering.

12. Pipeline Marker Signs: PG&E needs to maintain pipeline marker signs for gas transmission pipelines in order to ensure public awareness of the presence of the pipelines. With prior written approval from PG&E Pipeline Services, an existing PG&E pipeline marker sign that is in direct conflict with proposed developments may be temporarily relocated to accommodate construction work. The pipeline marker must be moved back once construction is complete.

13. PG&E is also the provider of distribution facilities throughout many of the areas within the state of California. Therefore, any plans that impact PG&E's facilities must be reviewed and approved by PG&E to ensure that no impact occurs which may endanger the safe operation of its facilities.

Attachment 2 – Electric Facilities

It is PG&E's policy to permit certain uses on a case by case basis within its electric transmission fee strip(s) and/or easement(s) provided such uses and manner in which they are exercised, will not interfere with PG&E's rights or endanger its facilities. Some examples/restrictions are as follows:

1. Buildings and Other Structures: No buildings or other structures including the foot print and eave of any buildings, swimming pools, wells or similar structures will be permitted within fee strip(s) and/or easement(s) areas. PG&E's transmission easement shall be designated on subdivision/parcel maps as "**RESTRICTED USE AREA – NO BUILDING.**"
2. Grading: Cuts, trenches or excavations may not be made within 25 feet of our towers. Developers must submit grading plans and site development plans (including geotechnical reports if applicable), signed and dated, for PG&E's review. PG&E engineers must review grade changes in the vicinity of our towers. No fills will be allowed which would impair ground-to-conductor clearances. Towers shall not be left on mounds without adequate road access to base of tower or structure.
3. Fences: Walls, fences, and other structures must be installed at locations that do not affect the safe operation of PG&E's facilities. Heavy equipment access to our facilities must be maintained at all times. Metal fences are to be grounded to PG&E specifications. No wall, fence or other like structure is to be installed within 10 feet of tower footings and unrestricted access must be maintained from a tower structure to the nearest street. Walls, fences and other structures proposed along or within the fee strip(s) and/or easement(s) will require PG&E review; submit plans to PG&E Centralized Review Team for review and comment.
4. Landscaping: Vegetation may be allowed; subject to review of plans. On overhead electric transmission fee strip(s) and/or easement(s), trees and shrubs are limited to those varieties that do not exceed 15 feet in height at maturity. PG&E must have access to its facilities at all times, including access by heavy equipment. No planting is to occur within the footprint of the tower legs. Greenbelts are encouraged.
5. Reservoirs, Sumps, Drainage Basins, and Ponds: Prohibited within PG&E's fee strip(s) and/or easement(s) for electric transmission lines.
6. Automobile Parking: Short term parking of movable passenger vehicles and light trucks (pickups, vans, etc.) is allowed. The lighting within these parking areas will need to be reviewed by PG&E; approval will be on a case by case basis. Heavy equipment access to PG&E facilities is to be maintained at all times. Parking is to clear PG&E structures by at least 10 feet. Protection of PG&E facilities from vehicular traffic is to be provided at developer's expense AND to PG&E specifications. Blocked-up vehicles are not allowed. Carports, canopies, or awnings are not allowed.
7. Storage of Flammable, Explosive or Corrosive Materials: There shall be no storage of fuel or combustibles and no fueling of vehicles within PG&E's easement. No trash bins or incinerators are allowed.
8. Streets and Roads: Access to facilities to be maintained at all times. Street lights may be allowed in the fee strip(s) and/or easement(s) but in all cases must be reviewed by PG&E for



proper clearance. Roads and utilities should cross the transmission easement as nearly at right angles as possible. Road intersections will not be allowed within the transmission easement.

9. Pipelines: Pipelines may be allowed provided crossings are held to a minimum and to be as nearly perpendicular as possible. Pipelines within 25 feet of PG&E structures require review by PG&E. Sprinklers systems may be allowed; subject to review. Leach fields and septic tanks are not allowed. Construction plans must be submitted to PG&E for review and approval prior to the commencement of any construction.

10. Signs: Signs are not allowed except in rare cases subject to individual review by PG&E.

11. Recreation Areas: Playgrounds, parks, tennis courts, basketball courts, barbecue and light trucks (pickups, vans, etc.) may be allowed; subject to review of plans. Heavy equipment access to PG&E facilities is to be maintained at all times. Parking is to clear PG&E structures by at least 10 feet. Protection of PG&E facilities from vehicular traffic is to be provided at developer's expense AND to PG&E specifications.

12. Construction Activity: Since construction activity will take place near PG&E's overhead electric lines, please be advised it is the contractor's responsibility to be aware of, and observe the minimum clearances for both workers and equipment operating near high voltage electric lines set out in the High-Voltage Electrical Safety Orders of the California Division of Industrial Safety (<https://www.dir.ca.gov/Title8/sb5g2.html>), as well as any other safety regulations. Contractors shall comply with California Public Utilities Commission General Order 95 (http://www.cpuc.ca.gov/gos/GO95/go_95_startup_page.html) and all other safety rules. No construction may occur within 25 feet of PG&E's towers. All excavation activities may only commence after 811 protocols has been followed.

Contractor shall ensure the protection of PG&E's towers and poles from vehicular damage by (installing protective barriers) Plans for protection barriers must be approved by PG&E prior to construction.

13. PG&E is also the owner of distribution facilities throughout many of the areas within the state of California. Therefore, any plans that impact PG&E's facilities must be reviewed and approved by PG&E to ensure that no impact occurs that may endanger the safe and reliable operation of its facilities.



When planning a development project, it is important that any new buildings or landscaping are located a safe distance from overhead and underground utility lines. Pacific Gas and Electric Company (PG&E) has developed the following 3-step guide to assist cities/counties, builders, and developers with ensuring preliminary plans are compatible with any PG&E electric or gas facilities in the area.

STEP 1
SUBMIT

Please send all environmental and preliminary planning documents to pgeplanreview@pge.com or 6111 Bollinger Canyon Rd., 3rd Floor, Mail Code: BR1Y3A, San Ramon, CA 94583. Planning documents include (but may not be limited to): Environmental Documents, subdivision maps, general city/county plans

**This plan review process does not replace the application process for PG&E gas or electric service that development plans may require. For these requests, please continue to work with PG&E service planning department. See link Below:*

<https://www.pge.com/cc/>

STEP 2
REVIEW

PG&E will review the planning documents to confirm:

- Plans are compatible with any existing or proposed gas or electric facilities
- If a Public Utility Easement or Dedicated Easement is needed for new facilities
- Compliance with existing easement, if applicable

STEP 3
RESPONSE

Within 45-days of submission, PG&E will issue a response letter.

- If no impacts were identified, PG&E will provide approval to preliminary plans, along with any requirements that must be followed as the project moves forward.
- If impacts were identified, PG&E will provide comments to the submitter to update and re-submit the plans.

For More Information

For more information, or to check the status of your plan review, please contact PG&E Land Management Department at 1-877-259-8314. PG&E will follow-up with you within two business days.



August 13, 2018

Mr. Tom Buford
Community Development Department
City of Sacramento
300 Richards Boulevard, 3rd Floor
Sacramento, CA 95811

Re: Notice of Preparation of Environmental Impact Report
West Broadway, Sacramento

Mr. Buford:

Thank you for giving us the opportunity to review the subject plans. The proposed West Broadway Specific Plan is within the same vicinity of PG&E's existing facilities that impact this area. PG&E has existing gas transmission and distribution facilities throughout this area that may potentially be impacted by any future development. At which time you have definitive plans for this area, please submit your proposals to PGEPlanReview@pge.com for review and comment to ensure PG&E facilities are protected during any future development.

Please contact the Building and Renovation Center (BRSC) for facility map requests at BRSCSSR@pge.com and PG&E's Service Planning department at www.pge.com/cco for any modification or relocation requests, or for any additional distribution-related services you may require.

If you have any questions regarding our response, please contact me at john.spigott@pge.com.

Sincerely,

John Spigott
Land Management
925-328-5122



August 10, 2018

Submitted via email

Tom Buford, Manager, Environmental Planning Services
Community Development Department
300 Richards Blvd., 3rd Floor
Sacramento, CA 95811

Re: Notice of Preparation of an Environmental Impact Report for the West Broadway Specific Plan

The Board of Directors of Preservation Sacramento wishes to provide comment regarding this Notice of Preparation for an EIR. The project has the potential to affect multiple listed and identified historic resources, and there are multiple potentially eligible resources within the project area.

Listed and Previously Identified Resources

New Helvetia Historic District, listed in the National Register of Historic Places, is located within the boundaries of the district. The effects of this project on a listed historic resource should be evaluated in the Environmental Impact Report.

The Walnut Grove Branch of the Southern Pacific Railroad, also known as the Sacramento Southern Railroad, was determined eligible for listing in the National Register of Historic Places as a result of environmental review occurring in 1991 (Army Corps of Engineers evaluation performed by PAR Environmental Services.) Thus, the effects of this project on this identified historic resource should be evaluated in the Environmental Impact Report, including whether the spur extending under Interstate 5 to the former Setzer Forest Products plant should be considered a contributing feature of this historic resource.

Potentially Eligible Resources

The public housing projects known as Marina Vista, historically known as Seavey Circle, should be evaluated for potential eligibility as historic resources; they have a different historic context than New Helvetia/Alder Grove, but are old enough to require separate evaluation in their own context.

The industrial buildings along 1st Avenue and 5th Street should be evaluated as individual resources, but also evaluated as a potential historic district due to their proximity and similarity of uses, as a concentration of industrial uses located on Sacramento's urban perimeter, served by both railroads and



PRESERVATION SACRAMENTO

PO Box 162140, Sacramento CA 95816 – preservation.sacramento@gmail.com – PreservationSacramento.org

trucks, including California Shellfish Company and Saccani Distributing; the latter building appears to include elements of Moderne architectural styles.

2551 5th Street, formerly known as Steamworks, was an early LGBTQ owned Sacramento business, operated by gay rights activist and businessman Rick Stokes during the 1970s and 1980s; it should be reviewed for eligibility in this context.

Miller Park Marina was designed by master architect Lawrence Halprin; the EIR should survey the property's potential eligibility in the area of landscape architecture. In addition, there are multiple buildings located on the site originally constructed in the 1930s as United States Marine Corps training facilities; these properties should be evaluated as potentially eligible historic resources.

Sincerely,

William Burg, President, Preservation Sacramento Board of Directors



August 13, 2018

Submitted by e-mail

Tom Buford, Manager, Environmental Planning Services
City of Sacramento Community Development Department
300 Richards Blvd., 3rd Floor
Sacramento, CA 95811-0218
E-mail: TBuford@cityofsacramento.org

Re: Notice of Preparation of an Environmental Impact Report for the West Broadway Specific Plan

Dear Mr. Buford:

Thank you for the opportunity to comment on the Notice of Preparation of an Environmental Impact Report for the West Broadway Specific Plan (WBSP). Sacramento Modern (SacMod) is a 501(c)(3) non-profit organization founded in 2010; we are dedicated to preserving modern art, architecture, and design in the Sacramento region. We do this by conducting historical and architectural research and evaluation, home tours, bike tours, walking tours, film screenings, preservation campaigns, publications, and educating the public about modernism.

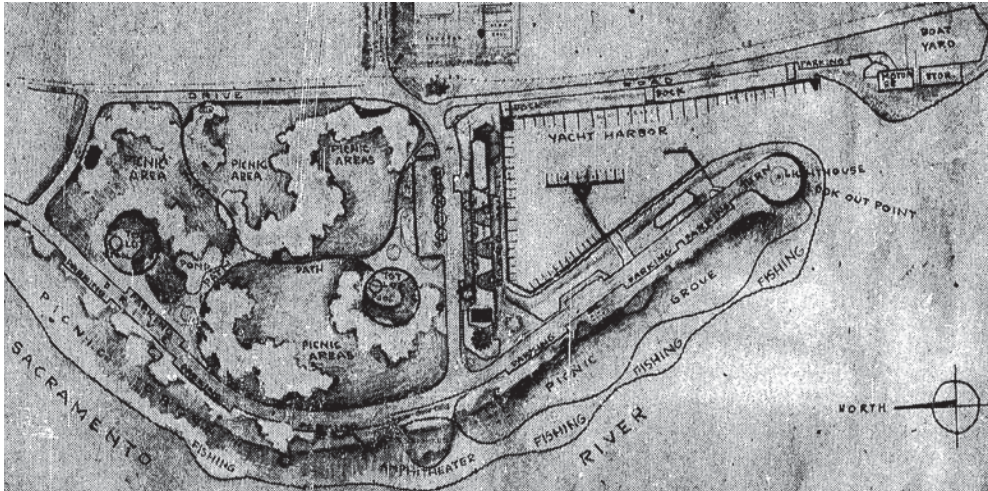
We are concerned that all identified and eligible historic resources are evaluated as part of the WBSP. We concur with our colleagues at Preservation Sacramento regarding New Helvetia Historic District; the Sacramento Southern Railroad; Marina Vista; the industrial buildings on 1st Avenue and 5th Street; and Steamworks.

Additionally, there are some mid-20th century resources within the WBSP that require evaluation as potentially eligible historic resources. These include:

A 501(c)(3) non-profit organization dedicated to promoting, preserving and protecting modern art, architecture and design in the Sacramento region.

Gretchen Steinberg 4910 South Land Park Drive, Sacramento, CA 95822
gretchen@SacMod.org
SacMod.org

- Miller Regional Park - 2710 Marina View Drive
 - master plan, park, and marina - designed by master landscape architect Lawrence Halprin in 1952.



< Via Sacramento Bee, November 17, 1952

- Saccani Distributing Company building (circa 1933) and Burgermeister Sign (circa 1950s) - 2600 5th Street



< Via saccanidist.com

- Muir Way Market (formerly Cardinal Market) - 2736 Muir Way

MUIR WAY AT McCLATCHY . . . SOUTH OF BROADWAY

< Via Sacramento
Bee, December
16, 1948



These are only a few illustrative examples of potentially eligible historic resources within the WBSP area. SacMod will gladly share our research with the City and its agents regarding these potentially eligible resources.

Additionally, SacMod believes parts of Broadway constitute a historic district; particularly the area's multiple streamline moderne buildings and vintage neon signs. We offer our assistance and support in initiating and following through on such an effort.

Respectfully submitted,

Gretchen Steinberg, President, SacMod

August 6, 2018

SENT VIA E-MAIL ONLY

Tom Buford
City of Sacramento
Community Development Department
300 Richards Blvd., 3rd Floor
Sacramento, CA 95811

RE: Notice of Preparation of an Environmental Impact Report for the West Broadway Specific Plan (SAC201801998)

Dear Mr. Buford:

Thank you for providing the Notice of Preparation of an Environmental Impact Report for the West Broadway Specific Plan (WBSP) to the Sacramento Metropolitan Air Quality Management District (Sac Metro Air District) for review. The West Broadway Specific Plan 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.

The Sac Metro Air District recommends that the City conduct an air quality analysis of short-term and long-term impacts of the plan in conjunction with the development of the environmental document, and to include this analysis in the draft environmental impact report. The analysis should determine whether air quality impacts are significant. If significant, the environmental impact report should include air quality mitigation to reduce operational emissions by 15 percent. This is in accordance with General Plan policy 6.1.3, *Emissions Reduction - The City shall require development projects that exceed SMAQMD ROG and NOX operational thresholds to incorporate design or operational features that reduce emissions equal to 15 percent from the level that would be produced by an unmitigated project.*

We recommend also that the report analyze a "low-exposure" project alternative that would minimize WBSP resident exposure to toxic emissions from Interstate 5 by including the following measures:

1. Non-residential uses are located nearest Interstate 5, a source of toxic air contaminants.
2. Residences are placed as far away as possible from Interstate 5.
3. Enhanced indoor air filtration, with filters equivalent to or greater than that provided by MERV 13, is installed in all residences in the WBSP.¹

¹ The filtration for the heating, ventilation and air conditioning system (HVAC) should be certified by the American Society of Heating, Refrigerating and Air-Conditioning Engineers (ASHRAE) and equivalent to or greater than that provided by MERV 13 filters (as defined by ASHRAE standard 52.2). A licensed mechanical engineer, or an individual authorized by California Business and Professions Code Sections 6700-6799 to design mechanical

Mr. Tom Buford
August 13, 2018
West Broadway Specific Plan
Page 2

4. A vegetative barrier is planted and maintained along both sides of Interstate 5 to reduce exposure to toxic emissions. See the Sac Metro Air District's [Landscaping Guidance for Improving Air Quality near Roadways](#) for information on tree and shrub selection and planting.
5. Trees are planted to the extent possible to maximize tree canopy in all areas within 1,000 feet of Interstate 5.


The Sac Metro Air District recommends that the WBSP demonstrate consistency with the following plans:

- SACOG Metropolitan Transportation Plan / Sustainable Communities Strategy
- Sacramento 2016 Bicycle Master Plan
- Sacramento 2006 Pedestrian Master Plan
- Sacramento Urban Forest Master Plan, to be completed in Spring 2019
- Broadway Complete Streets Plan

Should the project require mitigation measures, consider including homes accessible to all incomes as an emissions reduction measure.²

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

Sincerely,



Teri Duarte, MPH
Planner/Analyst

Cc: Paul Philley, Sac Metro Air District

ventilation systems, should be consulted. Building permit documents should incorporate all designs and details necessary for the construction of the enhanced ventilation system. The ventilation systems installed should be properly maintained as specified by the manufacturer.

² California Air Pollution Control Officers Association, *Quantifying Greenhouse Gas Mitigation Measures*, p. 176.

Attachment

Sac Metro Air District Rules & Regulations Statement (revised 6/2018)

*The following statement is recommended as standard condition of approval or construction document language for **all** development projects within the Sacramento Metropolitan Air Quality Management District (Sac Metro Air District):*

All projects are subject to Sac Metro Air District rules in effect at the time of construction. A complete listing of current rules is available at www.airquality.org or by calling 916-874-4800. Specific rules that may relate to construction activities or building design may include, but are not limited to:

Rule 201: General Permit Requirements. Any project that includes the use of equipment capable of releasing emissions to the atmosphere may require permit(s) from Sac Metro Air District prior to equipment operation. The applicant, developer, or operator of a project that includes an emergency generator, boiler, or heater should contact the Sac Metro Air District early to determine if a permit is required, and to begin the permit application process. Other general types of uses that require a permit include, but are not limited to, dry cleaners, gasoline stations, spray booths, and operations that generate airborne particulate emissions. Portable construction equipment (e.g. generators, compressors, pile drivers, lighting equipment, etc.) with an internal combustion engine over 50 horsepower is required to have a Sac Metro Air District permit or a California Air Resources Board portable equipment registration (PERP) (see Other Regulations below).

Rule 402: Nuisance. The developer or contractor is required to prevent dust or any emissions from onsite activities from causing injury, nuisance, or annoyance to the public.

Rule 403: Fugitive Dust. The developer or contractor is required to control dust emissions from earth moving activities, storage or any other construction activity to prevent airborne dust from leaving the project site.

Rule 414: Water Heaters, Boilers and Process Heaters Rated Less Than 1,000,000 BTU PER Hour. The developer or contractor is required to install water heaters (including residence water heaters), boilers or process heaters that comply with the emission limits specified in the rule.

Rule 417: Wood Burning Appliances. This rule prohibits the installation of any new, permanently installed, indoor or outdoor, uncontrolled fireplaces in new or existing developments.

Rule 442: Architectural Coatings. The developer or contractor is required to use coatings that comply with the volatile organic compound content limits specified in the rule.

Rule 453: Cutback and Emulsified Asphalt Paving Materials. This rule prohibits the use of certain types of cut back or emulsified asphalt for paving, road construction or road maintenance activities.

Rule 460: Adhesives and Sealants. The developer or contractor is required to use adhesives and sealants that comply with the volatile organic compound content limits specified in the rule.

Rule 902: Asbestos. The developer or contractor is required to notify the Sac Metro Air District of any regulated renovation or demolition activity. Rule 902 contains specific requirements for surveying, notification, removal, and disposal of asbestos containing material.

Other Regulations (California Code of Regulations (CCR))

17 CCR, Division 3, Chapter 1, Subchapter 7.5, §93105 Naturally Occurring Asbestos: The developer or contractor is required to notify the Sac Metro Air District of earth moving projects, greater than 1 acre in size in areas “Moderately Likely to Contain Asbestos” within eastern Sacramento County. The developer or contractor is required to comply with specific requirements for surveying, notification, and handling soil that contains naturally occurring asbestos.

13 CCR, Division 3, Chapter 9, Article 5, Portable Equipment Registration Program: The developer or contractor is required to comply with all registration and operational requirements of the portable equipment registration program such as recordkeeping and notification.

13 CCR, Division 3, Chapter 9, Article 4.8, §2449(d)(2) and 13 CCR, Division 3, Chapter 10, Article 1, §2485 regarding Anti-Idling: Minimize idling time either by shutting equipment off when not in use or reducing the time of idling to 5 minutes. These apply to diesel powered off-road equipment and on-road vehicles, respectively.



Sent Via E-Mail

August 13, 2018

Tom Buford
City of Sacramento
300 Richards Blvd., 3rd Floor
Sacramento, CA 95811
tbuford@cityofsacramento.org

Subject: West Broadway Specific Plan Notice of Preparation of an Environmental Impact Report

Dear Mr. Buford:

The Sacramento Municipal Utility District (SMUD) appreciates the opportunity to provide comments on the Notice of Preparation (NOP) for the West Broadway Specific Plan. 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 NOP 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:
 - <https://www.smud.org/en/Business-Solutions-and-Rebates/Design-and-Construction-Services>
 - <https://www.smud.org/en/Corporate/Do-Business-with-SMUD/Land-Use/Transmission-Right-of-Way>
- Utility line routing
- Easements for electrical infrastructure
- 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:

- The area defined by this Notice of Preparation (NOP) is served by SMUD's 21kV system. Overhead and underground 21kV lines are located throughout the specific plan area and are typically found adjacent to streets or roadways. 21kV line extensions, both overhead and underground, will likely be needed along streets per individual requirements. The amount of new infrastructure needed to serve customers is dependent on the type of loading/infill that is being proposed. New infrastructure could potentially be a substation, sub-transmission lines and transmission lines.

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 NOP. 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
6301 S Street, Mail Stop A313
Sacramento, CA 95817
nicole.goi@smud.org

Cc: Rob Ferrera

From: [Genevive Taylor](#)
To: [Chaffee, Craig \(MHSD-FMOR\)@DHCS](#); [Tom Buford](#)
Cc: [Helen Selph](#); [Greg Sandlund](#); [Craig Chaffee](#); [Genevive Taylor](#)
Subject: Re: Input as resident in NWLP area where you are planning development.
Date: Wednesday, July 25, 2018 4:00:37 PM

Thank you Craig for your views and presentation. Having lived in LP for approx. 35 years, I too am not a fan of the continued PH, but an evolution of PH Villages, replacing the overcrowded/warehousing of PH Tenants. In it's place of the 70.2 acres where AG/MV PH are located, I propose Market Rate housing, with the Land Park Woods (75 units) to be the LP Village.

And, it would be Democratic and Fair to have LP residents having a say as to their destiny, instead of being saddled by increased PH. Will the PH increase LP Home Values? Will the PH reduce Crime, Litter? Will the PH increase opportunities for Jobs, Education? PH Villages will surely level the playing field for the Tenants of the PH, not shackle them.

Thank you-
Art Taylor
LPCA

From: "Chaffee, Craig (MHSD-FMOR)@DHCS" <Craig.Chaffee@dhcs.ca.gov>
To: "tbuford@cityofsacramento.org" <tbuford@cityofsacramento.org>
Cc: 'Helen Selph' <HSelph@cityofsacramento.org>; 'Greg Sandlund' <GSandlund@cityofsacramento.org>; Genevive Taylor <semperfitaylor@sbcglobal.net>; Craig Chaffee <cjchaffee@comcast.net>
Sent: Wednesday, July 25, 2018 11:48 AM
Subject: Input as resident in NWLP area where you are planning development.

Dear Mr. Buford,

I was planning on attending the City/consultant meeting tonight on West Broadway/NWLP planning. But as a still working senior citizen (and grandparent) I'm not sure I'll brave the heat, and attend in person. So I'm offering some input here as a LONG TERM resident of the area. I've communicated numerous times with Helen Selph too. I find her responsive and informative. Most appreciated! She can likely share previous communications. Below I try to focus on CEQA/EIR related concerns. I've included Art Taylor – Board Member on our Land Park Community Association. Mr. Taylor has been very involved in the public housing issues for a long time.

Helen Selph communicated to me about possible CEQA 'Streamlining' on this project: "Detailed evaluation of potential residential and mixed use projects proposed under the Northwest Land Park Specific Plan will expedite the approval process for future projects that are consistent with the Northwest Land Park Specific Plan. Depending on the characteristics of future projects, streamlining under the Northwest Land Park Specific Plan EIR may range from a complete exemption to preparation of a focused, project-specific environmental document. (Please note that due to Federal funding requirements, any re-development of Marina Vista and Alder Grove public housing properties will require additional environmental review, including

NEPA).”

My family has lived in the small surrounding fragile neighborhood since 1980.

I consulted a lawyer knowledgeable on CEQA/EIRs. The City and their consultants (partially hired because of their knowledge/experience on how to “fast track” CEQA/EIR reviews) should not try to use the ‘fair share affordable housing’ concept to fast track the CEQA/EIR reviews in an area already plagued with a gross over-concentration of public housing (PH) . That is political and hypocritical. That is not a correct use of the fair share concept for fast tracking CEQA/EIR reviews. Community has right to legally dispute the PH overconcentration /resulting community problems for decades using CEQA; such CEQA reviews can and should include socioeconomic issues too.

Here’s some main points for the City/consultants.

- My family and most neighbors support the principles of fair share affordable housing.
- However, City/consultants should not try to use the fair share affordable housing concept to fast track the CEQA/EIR review in an area already plagued with a gross over-concentration of PH. Instead the City/consultants should use the fair share principles and facts about the existing overconcentration of public housing in this one little area to support long term plans to spread PH and other affordable housing throughout City AND County, not to keep it over-concentrated in this one little area
- Related City Council Reports (e.g., April 3, 2018) on funding these consultants and working on this West Broadway/NWLP plan say “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.” The final plan must accomplish this equitable distribution of affordable housing throughout Sacramento, not over-concentrating it here.
- The State Office of Environmental Health Hazard Assessment (OEHHA) shows that this specific West Broadway/NWLP area of Sacramento is one of the most polluted areas and negatively impacted by socioeconomic challenges in the County AND State. The overconcentration of public housing in this area drives OEHHS’s very troubling rankings of high poverty and unemployment, This little Sac area contains over 44% of all of SHRA’s PH units in the ENTIRE City limits, one of the largest concentrations of PH anywhere in the Western United States.
- EACH of the 2 PH projects is, by far, the largest in the entire Sacramento area. This unhealthy overconcentration is the result of the failed last century government policy of cramming too much public housing in one place – based on racism, NIMBY by more powerful neighborhoods accepting NONE/ZERO, and political expediency. And, right next door to these two huge PH projects, the City/SHRA converted a 75 unit apartment complex it promised the neighbors would always only be for seniors into all

low-income all age units. The seniors left because the PH projects made it a dangerous area to live.

- For many decades the overconcentration in this one small Sacramento area has caused major problems for the project tenants, surrounding neighbors and taxpayers. This neighborhood became the most violent area in all of Sacramento in the early 90's.
- The evidence is clear. Placing too much public housing in one little area results in major problems: Overconcentration of poverty, substance abuse and other mental health disorders, child neglect, crime, delinquency, poor education, unemployment and many others. It's warehousing those in need.
- Sacramento must develop and implement a vision and plan to spread and integrate effective public and other affordable housing throughout Sacramento using fair share principles. Please don't leave both of these two huge PH projects crammed in this one small Sacramento area.

Thank You. I appreciate my comments being recorded/ added to community input, and concerns addressed/mitigated.

From: [Genevive Taylor](#)
To: [Scott Johnson](#); [Craig Chaffee](#)
Cc: [Tom Buford](#); craig@eyeonsacramento.org; Craig.Chaffee@dhcs.ca.gov
Subject: Re: Please include all of the following emails/information in the formal written record of public comment on the West Broadway/NWLP planning efforts and EIR and CEQA work specifically.
Date: Thursday, August 2, 2018 8:19:11 AM

Good morning Craig, Scott,

Thank you for mentioning and including the noted Environmental considerations for this build. My biggest concerns are: The PH Expansion from 751 units to 1200/1500 units and the traffic that will be generated on Broadway and the surrounding communities, from: PH Expansion, The Mill Expansion, the NW Broadway Expansion, The Broadway Bridge to WS Expansion.

Myself, Craig Chaffee and many other LP, ULP residents and surrounding communities are the ones who have to deal with the results of this project. The Freeport Road Diet is a prime example of what was supposed to be a positive project, to a questionable project.

Thank you-

Art Taylor

LPCA

From: Scott Johnson <SRJohnson@cityofsacramento.org>
To: Craig Chaffee <cjchaffee@comcast.net>
Cc: Tom Buford <TBuford@cityofsacramento.org>; "craig@eyeonsacramento.org" <craig@eyeonsacramento.org>; 'Genevive Taylor' <semperfitaylor@sbcglobal.net>; "Craig.Chaffee@dhcs.ca.gov" <Craig.Chaffee@dhcs.ca.gov>
Sent: Thursday, August 2, 2018 7:50 AM
Subject: RE: Please include all of the following emails/information in the formal written record of public comment on the West Broadway/NWLP planning efforts and EIR and CEQA work specifically.

Dear Mr. Chaffee,

Thank you for your additional response to the Notice of Preparation (NOP) of an Environmental Impact Report for the West Broadway Specific Plan project. Your concerns will be included with responses and comments provided on the NOP to assist in the preparation of the draft environmental impact report.

Thank you again,

Scott Johnson
City of Sacramento
Community Development Department
Environmental Planning Services
300 Richards Blvd., 3rd Floor
Sacramento, CA 95811
(916) 808-5842
srjohnson@cityofsacramento.org

From: Craig Chaffee <cjchaffee@comcast.net>

Sent: Wednesday, August 1, 2018 5:19 PM

To: Scott Johnson <SRJohnson@cityofsacramento.org>

Cc: Tom Buford <TBuford@cityofsacramento.org>; craig@eyeonsacramento.org; 'Genevive Taylor' <semperfitaylor@sbcglobal.net>; Craig.Chaffee@dhcs.ca.gov

Subject: Please include all of the following emails/information in the formal written record of public comment on the West Broadway/NWLP planning efforts and EIR and CEQA work specifically.

Dear Mr. Johnson. City West Broadway/NWLP Area Planning team,

It is my understanding that public input on the “West Broadway/Northwest Land Park Plan project work related to the EIR and CEQA are still being accepted.

Please include/record this email and all its contents in the community/public input for this planning project and related EIR and CEQA work.

Please make sure to address and plan to mitigate the related issues in your EIR and CEQA work.

Please let me know if you have any questions/etc. My family and so many others in this community strive for a much safer community and environment free from such hazards to live in and raise our families. Thank You.

Again, I've been advised by a lawyer very knowledgeable in such law/subject matter that CEQA covers socioeconomic impacts; there is authority that they're covered. The following 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 4 of the Environmental Handbook](#), for example: <http://www.dot.ca.gov/ser/vol1/sec5/ch36eir/chap36.htm#required>

As state below to your office on July 25, 2018 (in email below):

- The State Office of Environmental Health Hazard Assessment (OEHHA) shows that this specific West Broadway/NWLP area of Sacramento is one of the most polluted areas and negatively impacted by socioeconomic challenges in the County AND State. The overconcentration of public housing in this area drives OEHHS's very troubling rankings of high poverty and unemployment, This little Sac area contains over 44% of all of SHRA's PH units in the ENTIRE City limits, one of the largest concentrations of PH anywhere in the Western United States.
- EACH of the 2 public housing projects in this area is, by far, the largest in the entire

Sacramento area. This unhealthy overconcentration is the result of the failed last century government policy of cramming too much public housing in one place – based on racism, NIMBY by more powerful neighborhoods accepting NONE/ZERO, and political expediency. And, right next door to these two huge PH projects, the City/SHRA converted a 75 unit apartment complex it promised the neighbors would always only be for seniors into all low-income all age units. The seniors left because the PH projects made it a dangerous area to live.

- For many decades the overconcentration in this one small Sacramento area has caused major problems for the project tenants, surrounding neighbors and taxpayers. This neighborhood became the most violent area in all of Sacramento in the early 90's.
- The evidence is clear. Placing too much public housing in one little area results in major problems: Overconcentration of poverty, substance abuse and other mental health disorders, child neglect, crime, delinquency, poor education, unemployment and many others. It's warehousing those in need.
- As reported the area around these two huge public housing projects crammed in this one little area of Sacramento has crime rates much higher than further away in the Land Park community. Using the online SACPD Lexus Nexis Community Crime Mapping analytics tool the types of crimes/events reported inside these housing projects were examined. In the last year there were over 330 reported in the ½ mile radius including both Alder Grove and Marina Vista (aka Seavey Circle). The following is a list of those, many listed often, reported inside these two public housing projects in the last year: Vandalism, Possible Financial Crime, Missing Person, Take Vehicle W/O Owner, Possession/ Sales Opiates/Narcotics, Harassment, Child Custody, DUI , Access Card Fraud, AWDW – Non Firearm, Felony Possession Ammo, Gang Activity, Robbery, Possession Stolen Vehicle, Assault W/ Caustic Chemicals, Petty Theft, Battery Civilian, Willful Disobedience, Danger to Self/Others, Resisting Peace Officer, Harassment, Inflicting Injury on Child, Casualty Report, Burglary Vehicle, Burglary Residence/Forced, Trespassing After Notice, Violated Protective Order, Found Property, Brandish –Non Gun, Child Assault/Sex Activity, Towed Stored Vehicle, Theft – License Plate, Auto Theft Location, Trespassing/Prowler, Domestic Violence, Robbery – Purse Snatch, US Theft of Mail, Forcibly Steal/Take, Brandish Firearm, Arson of Inhabited Structure, Hit/Run Injury, Shooting in Occupied Dwelling. SACPD and others (e.g., UC Davis Study for SHRA) report that many crimes go unreported in the public housing for fear of retaliation, so these crime/event statistics are conservative. The police can only really mop up/react to the underlying problem – the overconcentration of poverty/public housing in one little area of Sacramento that has caused a bad environment to live in, and major and costly problems.
- 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> Some quick takeaways: 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

public housing in any one area –overconcentration- creates communities with serious crime, health, education, and other major and costly problems that, in turn, further restrict the opportunities of those growing up and living in them. The impacts of neighborhood poverty rates on creating these problems increase rapidly if a neighborhood exceeds about 20 percent poverty.

Again, Sacramento must develop and implement a vision and plan to spread and integrate effective public and other affordable housing throughout Sacramento using fair share principles. Please don't leave both of these two huge PH projects crammed in this one small Sacramento area. Again, the overconcentration of public housing in this one little Sacramento area, and the resulting major and costly problems must be included in the EIR and CEQA . Alternatives must be developed to mitigate these major problems in this area/community.

As included in my July 25 written communication below, the Mayor of Sacramento says: ***“It is unfair and ultimately unsuccessful to over concentrate any housing or social service effort in one or several neighborhoods.”***

The following is another assurance from the current Mayor that plans will be developed to evenly distribute public housing throughout Sacramento, not leave so much in the West Broadway, NWLP area. The decades of major and costly problems are well documented and agreed to by so many in public documentation. These facts must not be dismissed/overlooked.

From: MayorSacramento@mail.senecagov.com
[<mailto:MayorSacramento@mail.senecagov.com>]

Sent: Tuesday, January 23, 2018 3:38 PM

To: Craig Chaffee

Subject: Re: FW: Sent following letter to Bee editors to publish and posted on our Next Door site.

Luis Montes has responded:

Dear Craig Chaffee,

*Thank you for contacting Mayor Darrell Steinberg's Office. We appreciate your willingness to share your thoughts and concerns with our office and we have forwarded your comments to the appropriate City staff. **The mayor agrees, it is necessary to have even distribution of public housing in all eight districts throughout Sacramento and in 2018, the mayor's goal is to increase the capacity to create an environment that spurs the construction of more public and affordable housing throughout all of Sacramento.** If you have any additional questions or concerns on this topic please do not hesitate to ask.*

Thank you, again, for contacting our office. Mayor Steinberg appreciates hearing from you.

Sincerely,

Luis Montes
Director of Constituent Affairs
Office of Mayor Darrell Steinberg
LMontes@cityofsacramento.org

From: Chaffee, Craig (MHSD-FMOR)@DHCS
Sent: Wednesday, July 25, 2018 12:33 PM
To: 'Scott Johnson' <SRJohnson@cityofsacramento.org>
Cc: Genevive Taylor <semperfitaylor@sbcglobal.net>; Craig Chaffee <cjchaffee@comcast.net>; Tom Buford <TBuford@cityofsacramento.org>
Subject: RE: Input as resident in NWLP area where you are planning development.

Dear Mr. Johnson,

Thank you for your responsiveness. Since 1980 when my wife and I moved to the little neighborhood ("Upper Land Park) with the 2 huge failed past century government projects (e.g., Seavey Circle and Alder Grove) we have been assured many times by government officials (e.g. past SHRA Director) that they understood that concentrating so much poverty and public housing in one little area (warehousing) was a failed government practice, and that at least half of the existing public housing units crammed in this one tiny little Sac area must be moved/integrated into other Sac areas using fair share principles. Yet, push comes to shove and NIMBY, the 2 huge projects have been left here by government, with all the major and costly problems – decade after decade. Below is a direct communication from the Mayor's Office on the issue. Must hard working tax paying homeowners all leave –seek higher safer ground? Will the City ever actually make good on their promises, or just build more of the same here, put more lipstick on the pig, and give it some fancy new name (e.g., Seavey Estates)? Again thank you for anything you can do to help affect real positive change for this very fragile community you now called North West Land Park.

Hi Craig,

Thanks for writing to the Mayor about the concern a of overconcentration of public housing in Upper Land Park.

I understand what I say does not carry the weight of what Darrell says or what I may communicate his position to be. To that end, here are Darrell's thoughts on the issue from him personally:

"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."

Warm regards,

Kelly F. Rivas
Campaign Manager

From: Scott Johnson <SRJohnson@cityofsacramento.org>
Sent: Wednesday, July 25, 2018 12:11 PM
To: Chaffee, Craig (MHSD-FMOR)@DHCS <Craig.Chaffee@dhcs.ca.gov>
Cc: Genevive Taylor <semperfitaylor@sbcglobal.net>; Craig Chaffee <cjchaffee@comcast.net>; Tom Buford <TBuford@cityofsacramento.org>
Subject: RE: Input as resident in NWLP area where you are planning development.

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Thank you,

Scott Johnson
City of Sacramento
Community Development Department
Environmental Planning Services
300 Richards Blvd., 3rd Floor
Sacramento, CA 95811
(916) 808-5842
srjohnson@cityofsacramento.org

From: Chaffee, Craig (MHSD-FMOR)@DHCS <Craig.Chaffee@dhcs.ca.gov>
Sent: Wednesday, July 25, 2018 12:01 PM
To: Scott Johnson <SRJohnson@cityofsacramento.org>
Cc: Genevive Taylor <semperfitaylor@sbcglobal.net>; Craig Chaffee <cjchaffee@comcast.net>
Subject: FW: Input as resident in NWLP area where you are planning development.

Dear Mr. Johnson,

I got the following email reply from Mr. Buford forwarding to you to make sure this was received "on time" for any community input deadline on this matter.

I am out of the office and will return Friday, August 3, 2018. If you need immediate assistance

please contact Scott Johnson at srjohnson@cityofsacramento.org or phone at (916) 808-5842.

Thank You.

From: Chaffee, Craig (MHSD-FMOR)@DHCS
Sent: Wednesday, July 25, 2018 11:48 AM
To: 'tbuford@cityofsacramento.org' <tbuford@cityofsacramento.org>
Cc: 'Helen Selph' <HSelph@cityofsacramento.org>; 'Greg Sandlund' <GSandlund@cityofsacramento.org>; 'Genevive Taylor' <semperfitaylor@sbcglobal.net>; 'Craig Chaffee' <cjchaffee@comcast.net>
Subject: Input as resident in NWLP area where you are planning development.

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Helen Selph communicated to me about possible CEQA ‘Streamlining’ on this project: “Detailed evaluation of potential residential and mixed use projects proposed under the Northwest Land Park Specific Plan will expedite the approval process for future projects that are consistent with the Northwest Land Park Specific Plan. Depending on the characteristics of future projects, streamlining under the Northwest Land Park Specific Plan EIR may range from a complete exemption to preparation of a focused, project-specific environmental document. (Please note that due to Federal funding requirements, any re-development of Marina Vista and Alder Grove public housing properties will require additional environmental review, including NEPA).”

My family has lived in the small surrounding fragile neighborhood since 1980.

I consulted a lawyer knowledgeable on CEQA/EIRs. The City and their consultants (partially hired because of their knowledge/experience on how to “fast track” CEQA/EIR reviews) should not try to use the ‘fair share affordable housing’ concept to fast track the CEQA/EIR reviews in an area already plagued with a gross over-concentration of public housing (PH) . That is political and hypocritical. That is not a correct use of the fair share concept for fast tracking CEQA/EIR reviews. Community has right to legally dispute the PH overconcentration /resulting community problems for decades using CEQA; such CEQA reviews can and should include socioeconomic issues too.

Here’s some main points for the City/consultants.

- My family and most neighbors support the principles of fair share affordable housing.

- However, City/consultants should not try to use the fair share affordable housing concept to fast track the CEQA/EIR review in an area already plagued with a gross over-concentration of PH. Instead the City/consultants should use the fair share principles and facts about the existing overconcentration of public housing in this one little area to support long term plans to spread PH and other affordable housing throughout City AND County, not to keep it over-concentrated in this one little area
- Related City Council Reports (e.g., April 3, 2018) on funding these consultants and working on this West Broadway/NWLP plan say “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.” The final plan must accomplish this equitable distribution of affordable housing throughout Sacramento, not over-concentrating it here.
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- EACH of the 2 PH projects is, by far, the largest in the entire Sacramento area. This unhealthy overconcentration is the result of the failed last century government policy of cramming too much public housing in one place – based on racism, NIMBY by more powerful neighborhoods accepting NONE/ZERO, and political expediency. And, right next door to these two huge PH projects, the City/SHRA converted a 75 unit apartment complex it promised the neighbors would always only be for seniors into all low-income all age units. The seniors left because the PH projects made it a dangerous area to live.
- For many decades the overconcentration in this one small Sacramento area has caused major problems for the project tenants, surrounding neighbors and taxpayers. This neighborhood became the most violent area in all of Sacramento in the early 90’s.
- The evidence is clear. Placing too much public housing in one little area results in major problems: Overconcentration of poverty, substance abuse and other mental health disorders, child neglect, crime, delinquency, poor education, unemployment and many others. It’s warehousing those in need.
- Sacramento must develop and implement a vision and plan to spread and integrate effective public and other affordable housing throughout Sacramento using fair share principles. Please don’t leave both of these two huge PH projects crammed in this one small Sacramento area.

Thank You. I appreciate my comments being recorded/ added to community input, and concerns addressed/mitigated.

From: [Genevive Taylor](#)
To: [Scott Johnson](#)
Cc: [Genevive Taylor](#); [Shannel La Due](#); [Denny Jones](#); [Mitch Rohrer](#)
Subject: Public Comments-NW LP/Broadway Expansion
Date: Tuesday, August 7, 2018 8:41:39 PM

Good evening Scott-Having resided in ULP and LP, I continue to live in the area and feel that the NW LP/Broadway Expansion needs to have several considerations before being hurried to the Build process.

I believe that the continued focus of expanding the Public Housing is truly a waste of Government monies and time for all. The present 751 units with it's approx. 1900 tenants have worn out their welcome, as SHRA cannot and does not show leadership, management, compassion in dealing with the units and tenants. Crime, traffic, parking, garbage are abounding in the PH. The recent Drone Public Meeting shows that SHRA did not initiate the correct procedure and due-diligence in the Drone roll-out. There some PH Residents who were praising the Drone program, while others felt their privacy was being taken advantage of. Then residents outside of the PH boundaries spoke and SHRA had no responses regarding the amount of oversight and lack of planning, concern, and advising the neighbors. The proposed 1200-1500 with approx. 3500 tenants for 1500 units makes the PH truly the Warehousing of the less fortunate. How can Sacramento justify creating another Ghetto by Warehousing so many people in one small area, regardless if new or old buildings.

The numbers alone of the additional builds, to include the proposed expansion of the PH, the expansion of the Mill, the expansion of the continued areas to the River and the proposed Bridge to West Sac, will all create a truly crowded and horrible scenario for the ULP, LP area. As what already occurs with the Freeport Road Diet, we now have much traffic skirting I-5 and HW 99, with motorists traveling through the neighborhoods at crazy speeds. With 7 schools in the immediate LP area, the traffic situation is crazy, at best.

In conclusion, the Expansion of the Public Housing and Traffic problems caused by the Expansion are and will destroy Land Park and Upper Land Park, making it as Oak Park had evolved.

Thank you-
Art Taylor
LPCA

Tom Buford

From: Genevive Taylor <semperfitaylor@sbcglobal.net>
Sent: Wednesday, August 8, 2018 10:50 AM
To: Chaffee, Craig (MHSD-FMOR)@DHCS; Tom Buford
Cc: Craig Chaffee; Genevive Taylor; Helen Selph
Subject: Re: Please include all of the following emails/information in the formal written record of public comment on the West Broadway/NWLP planning efforts and EIR and CEQA work specifically.

Good morning-Craig, you are correct. Land Park and Upper Land Park are under siege by those who want to expand, from within, to include the expansion of the Public Housing. Will the Crime, Litter, Illegal Parking, Garbage go away in LP, ULP and the PH with the Expansion to 1200/1500 Units? Common sense would say NO, but Increase. I have lived in LP for 35 years and the PH has been nothing but a drag on the other communities.

It's all about money and the Developers and Politicians wanting to chase the all mighty dollar, and not about Quality of Life. If it were Quality of Life, we would have Political representation for LP and ULP, but instead, we have nothing but greed to build, expand. Who will gain with this expansion? Surely not LP, ULP.

Thank you-

Art Taylor

LPCA

From: "Chaffee, Craig (MHSD-FMOR)@DHCS" <Craig.Chaffee@dhcs.ca.gov>
To: Tom Buford <TBuford@cityofsacramento.org>
Cc: 'Genevive Taylor' <semperfitaylor@sbcglobal.net>; Craig Chaffee <cjchaffee@comcast.net>
Sent: Wednesday, August 8, 2018 8:42 AM
Subject: RE: Please include all of the following emails/information in the formal written record of public comment on the West Broadway/NWLP planning efforts and EIR and CEQA work specifically.

Thank you Mr. Buford,.

My wife and I moved in this fragile little area, bought a little modest home here, in 1980. The area has potential but is plagued by the serious overconcentration of public housing and the resulting many major and costly problems. In the early 90's the great SHRA Director – Betty Turner -told us neighbors working with her on so many problems related to putting too much need public housing in one place that the future in Sacramento should be splitting up such public housing and integrating it a lot more throughout Sacramento – that overconcentration of such public housing (e.g., projects, warehouses) was harmful - created so many problems and costs. But Betty left to do great things on the East Coast. Time has gone by with little to no change – all talk and long term planning. About 5 years ago in early planning for the ULP/Broadway Transformation plan submitted to HUD in November 2015 (as you know not funded –Sac ended up proposing to leave the 751 public housing units all where they are and add many more units funded by low income tax credits –further concentrating such housing), SHRA told neighbors meeting with them that the “rough plan” was to leave about 325 to 350 of the 751 units (about ½) here and integrate the rest throughout Sacramento. That seemed fair, right. Last couple years Mayor has joined the vision for “fair share” distribution of the public and other affordable housing throughout Sacramento, and has repeatedly communicated to neighbors that he agrees there is way too much here . But still no progress. Time flies. My wife and I are grandparents now and wondering if this will ever change for the better, or if we need to give up hope and move. Sad. Frustrating. Thanks for listening and anything your team can do to effect real and positive change in this fragile neighborhood..

From: Tom Buford <TBuford@cityofsacramento.org>
Sent: Wednesday, August 8, 2018 8:22 AM
To: Chaffee, Craig (MHSD-FMOR)@DHCS <Craig.Chaffee@dhcs.ca.gov>
Cc: 'Genevive Taylor' <semperfitaylor@sbcglobal.net>; Craig Chaffee <cjchaffee@comcast.net>
Subject: RE: Please include all of the following emails/information in the formal written record of public comment on the West Broadway/NWLP planning efforts and EIR and CEQA work specifically.

Mr. Chaffee:

Your several comments regarding the Notice of Preparation for the West Broadway Specific Plan are being logged as they are received.

Thank you for your interest in the project.

Tom

*Tom Buford, Manager
Environmental Planning Services
(916) 799-1531*

From: Chaffee, Craig (MHSD-FMOR)@DHCS <Craig.Chaffee@dhcs.ca.gov>
Sent: Tuesday, August 7, 2018 3:43 PM
To: Tom Buford <TBuford@cityofsacramento.org>
Cc: 'Genevive Taylor' <semperfitaylor@sbcglobal.net>; Craig Chaffee <cjchaffee@comcast.net>
Subject: RE: Please include all of the following emails/information in the formal written record of public comment on the West Broadway/NWLP planning efforts and EIR and CEQA work specifically.

Dear Mr. Buford,

Per Scott's out of office message, to make sure my public comment is received and logged by the City in time. Thank You..

From: Scott Johnson <SRJohnson@cityofsacramento.org>
Sent: Tuesday, August 7, 2018 3:38 PM
To: Chaffee, Craig (MHSD-FMOR)@DHCS <Craig.Chaffee@dhcs.ca.gov>
Subject: Automatic reply: Please include all of the following emails/information in the formal written record of public comment on the West Broadway/NWLP planning efforts and EIR and CEQA work specifically.

I am out of the office and will be returning on Thursday, August 16, 2018.

Please contact Tom Buford, Principal Planner at tbuford@cityofsacramento.org or (916) 799-1531 with any urgent questions.

Thank you.

From: Chaffee, Craig (MHSD-FMOR)@DHCS
Sent: Tuesday, August 7, 2018 3:38 PM
To: 'Scott Johnson' <SRJohnson@cityofsacramento.org>
Cc: 'Tom Buford' <TBuford@cityofsacramento.org>; 'Genevive Taylor' <semperfitaylor@sbcglobal.net>; 'Craig Chaffee' <cjchaffee@comcast.net>

Subject: RE: Please include all of the following emails/information in the formal written record of public comment on the West Broadway/NWLP planning efforts and EIR and CEQA work specifically.

Dear Mr. Johnson,

Please add the following to the public comments for the NWLP/West Broadway develop planning. Thanks as always for being inclusive and capturing public comment on this MAJOR Sacramento planning effort. I understand that the public comment period ends shortly.

The State Office of Environmental Health Hazard Assessment (OEHHA) shows that this specific West Broadway/NWLP area of Sacramento is one of the most polluted areas and negatively impacted by socioeconomic challenges in the County AND State. The overconcentration of public housing in this area drives OEHHS's very troubling rankings of high poverty and unemployment, This little Sac area contains over 44% (751) of all of SHRA's PH units in the ENTIRE City limits, one of the largest concentrations of PH anywhere in the Western United States. The failed Seavey Circle housing project (warehouses) crams so many children in need right next to the major I-5 freeway with all the air pollution, and next to the poorest performing elementary school in Sacramento for so many DECADES. This is unconscionable. What kind of real government leaders/public servants would do/allow this?

From: Chaffee, Craig (MHSD-FMOR)@DHCS

Sent: Thursday, August 2, 2018 9:32 AM

To: 'Scott Johnson' <SRJohnson@cityofsacramento.org>

Cc: Tom Buford <TBuford@cityofsacramento.org>; craig@eyeonsacramento.org; 'Genevive Taylor' <semperfitaylor@sbcglobal.net>; Craig Chaffee <cjchaffee@comcast.net>

Subject: RE: Please include all of the following emails/information in the formal written record of public comment on the West Broadway/NWLP planning efforts and EIR and CEQA work specifically.

Thank you again Mr. Johnson,

I thought you and your team might also be interested in the following email "string" and related article in the Sacramento Bee.

From: Chaffee, Craig (MHSD-FMOR)@DHCS

Sent: Thursday, March 8, 2018 12:39 PM

To: MayorSteinberg@cityofsacramento.org; shansen@cityofsacramento.org

Cc: 'Genevive Taylor' <semperfitaylor@sbcglobal.net>; Craig Chaffee <cjchaffee@comcast.net>

Subject: JUST FYI: RE: Thank You. Read your great, informative article today in the local Sacramento Bee newspaper.

Sent email below to author of the following Bee article author today.

[CEQA isnt stopping affordable housing in California, it's protecting ...](http://www.sacbee.com/opinion/op-ed/soapbox/article203907234.html)

www.sacbee.com/opinion/op-ed/soapbox/article203907234.html

1 day ago - Developers point a finger at the California Environmental Quality Act as a key obstacle to building more **housing**. But today's streamlined **CEQA** protects **public** health and natural resources while giving voice to disadvantaged communities. ... **CEQA isn't stopping housing**, it's protecting health. By Allen ...

From: Chaffee, Craig (MHSD-FMOR)@DHCS
Sent: Thursday, March 8, 2018 12:29 PM
To: 'Allen.H@CCA EJ.org' <Allen.H@CCA EJ.org>
Cc: Craig Chaffee <cjchaffee@comcast.net>
Subject: Thank You. Read your great, informative article today in the local Sacramento Bee newspaper.

“CEQA isn’t stopping affordable housing” – Great work. Thank you.

My wife and I live in a little neighborhood in Sacramento CA. Many decades ago the City allowed over 44% of all public housing units in the City limits to be crammed in this one little neighborhood. This overconcentration of public housing in one little area is based on old failed past century practices, racism, NIMBY by the more powerful and affluent neighborhoods in Sacramento, developer greed and political expediency. Like you say in your article, falsehoods are substituted for facts. Most of these old dilapidated public housing units in Sacramento CA are also crammed right next to the I-5 Freeway. The area has some of the highest environmental risk/pollution scores in California. Now the City is seriously considering not only rebuilding all that public housing there, but doubling it on the same land. It doesn’t take a rocket scientist to tell you that such concentrated poverty, and next to a major California freeway, is unhealthy and harmful for that community and all those children. Neighbors try to convince the government and developers to spread such needed public housing out throughout Sacramento in a number of good neighborhoods with healthy environments using fair share principles, with not too much in any one neighborhood, but far more overall. Instead is the City government working with developers to “streamline” the public review process (including CEQA issues) and fast track their new public housing development all crammed in this one area, doubled and left by the freeway pollution? There is also a petroleum refinery very nearby. Yet will the City move forward to “streamline” community input and review for development plans? Certainly fits with the facts and bad practices you communicate in your great article. Thank you for your important work and writings. We’re hoping that Sacramento and other leaders in California and our nation will read and learn from great communication like yours. Best to you and your family.

Craig Chaffee
Sacramento, CA

From: Scott Johnson <SRJohnson@cityofsacramento.org>
Sent: Thursday, August 2, 2018 7:51 AM
To: Craig Chaffee <cjchaffee@comcast.net>
Cc: Tom Buford <TBuford@cityofsacramento.org>; craig@eyeonsacramento.org; 'Genevive Taylor' <semperfitaylor@sbcglobal.net>; Chaffee, Craig (MHSD-FMOR)@DHCS <Craig.Chaffee@dhcs.ca.gov>
Subject: RE: Please include all of the following emails/information in the formal written record of public comment on the West Broadway/NWLP planning efforts and EIR and CEQA work specifically.

Dear Mr. Chaffee,

Thank you for your additional response to the Notice of Preparation (NOP) of an Environmental Impact Report for the West Broadway Specific Plan project. Your concerns will be included with responses and comments provided on the NOP to assist in the preparation of the draft environmental impact report.

Thank you again,

Scott Johnson
City of Sacramento
Community Development Department
Environmental Planning Services
300 Richards Blvd., 3rd Floor
Sacramento, CA 95811
(916) 808-5842
srjohnson@cityofsacramento.org

From: Craig Chaffee <cjchaffee@comcast.net>
Sent: Wednesday, August 1, 2018 5:19 PM
To: Scott Johnson <SRJohnson@cityofsacramento.org>
Cc: Tom Buford <TBuford@cityofsacramento.org>; craig@eyeonsacramento.org; 'Genevive Taylor' <semperfitaylor@sbcglobal.net>; Craig.Chaffee@dhcs.ca.gov
Subject: Please include all of the following emails/information in the formal written record of public comment on the West Broadway/NWLP planning efforts and EIR and CEQA work specifically.

Dear Mr. Johnson. City West Broadway/NWLP Area Planning team,

It is my understanding that public input on the “West Broadway/Northwest Land Park Plan project work related to the EIR and CEQA are still being accepted.

Please include/record this email and all its contents in the community/public input for this planning project and related EIR and CEQA work.

Please make sure to address and plan to mitigate the related issues in your EIR and CEQA work.

Please let me know if you have any questions/etc. My family and so many others in this community strive for a much safer community and environment free from such hazards to live in and raise our families. Thank You.

Again, I've been advised by a lawyer very knowledgeable in such law/subject matter that CEQA covers socioeconomic impacts; there is authority that they're covered. The following 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 4 of the Environmental Handbook](http://www.dot.ca.gov/ser/vol1/sec5/ch36eir/chap36.htm#required), for example: <http://www.dot.ca.gov/ser/vol1/sec5/ch36eir/chap36.htm#required>

As state below to your office on July 25, 2018 (in email below):

- The State Office of Environmental Health Hazard Assessment (OEHHA) shows that this specific West Broadway/NWLP area of Sacramento is one of the most polluted areas and negatively impacted by socioeconomic challenges in the County AND State. The overconcentration of public housing in this area drives OEHHA's very troubling rankings of high poverty and unemployment. This little Sac area contains over 44% of all of SHRA's PH units in the ENTIRE City limits, one of the largest concentrations of PH anywhere in the Western United States.
- EACH of the 2 public housing projects in this area is, by far, the largest in the entire Sacramento area. This unhealthy overconcentration is the result of the failed last century government policy of cramming too much public housing in one place – based on racism, NIMBY by more powerful neighborhoods accepting NONE/ZERO, and political expediency. And, right next door to these two huge PH projects, the City/SHRA converted a 75 unit apartment complex it promised the neighbors would always only be for seniors into all low-income all age units. The seniors left because the PH projects made it a dangerous area to live.
- For many decades the overconcentration in this one small Sacramento area has caused major problems for the project tenants, surrounding neighbors and taxpayers. This neighborhood became the most violent area in all of Sacramento in the early 90's.
- The evidence is clear. Placing too much public housing in one little area results in major problems: Overconcentration of poverty, substance abuse and other mental health disorders, child neglect, crime, delinquency, poor education, unemployment and many others. It's warehousing those in need.
- As reported the area around these two huge public housing projects crammed in this one little area of Sacramento has crime rates much higher than further away in the Land Park community. Using the online SACPD Lexus Nexis Community Crime Mapping analytics tool he types of crimes/events reported inside these housing projects were examined.. In the last year there were over 330 reported in the ½ mile radius including both Alder Grove and Marina Vista (aka Seavey Circle). The following is a list of those, many listed often, reported inside these two public housing projects in the last year: Vandalism, Possible Financial Crime, Missing Person, Take Vehicle W/O Owner, Possession/ Sales Opiates/Narcotics, Harassment, Child Custody, DUI , Access Card Fraud, AWDW – Non Firearm, Felony Possession Ammo, Gang Activity, Robbery, Possession Stolen Vehicle, Assault W/ Caustic Chemicals, Petty Theft, Battery Civilian, Willful Disobedience, Danger to Self/Others, Resisting Peace Officer, Harassment, Inflicting Injury on Child, Casualty Report, Burglary Vehicle, Burglary Residence/Forced, Trespassing After Notice, Violated Protective Order, Found Property, Brandish –Non Gun, Child Assault/Sex Activity, Towed Stored Vehicle, Theft – License Plate, Auto Theft Location, Trespassing/Prowler, Domestic Violence, Robbery – Purse Snatch, US Theft of Mail, Forcibly Steal/Take, Brandish Firearm, Arson of Inhabited Structure, Hit/Run Injury, Shooting in Occupied Dwelling. SACPD and others (e.g., UC Davis Study for SHRA) report that many crimes go unreported in the public housing for fear of retaliation, so

these crime/event statistics are conservative. The police can only really mop up/react to the underlying problem – the overconcentration of poverty/public housing in one little area of Sacramento that has caused a bad environment to live in, and major and costly problems.

- 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> Some quick takeaways: 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 public housing in any one area –overconcentration- creates communities with serious crime, health, education, and other major and costly problems that, in turn, further restrict the opportunities of those growing up and living in them. The impacts of neighborhood poverty rates on creating these problems increase rapidly if a neighborhood exceeds about 20 percent poverty.

Again, Sacramento must develop and implement a vision and plan to spread and integrate effective public and other affordable housing throughout Sacramento using fair share principles. Please don't leave both of these two huge PH projects crammed in this one small Sacramento area. Again, the overconcentration of public housing in this one little Sacramento area, and the resulting major and costly problems must be included in the EIR and CEQA . Alternatives must be developed to mitigate these major problems in this area/community.

As included in my July 25 written communication below, the Mayor of Sacramento says: "***It is unfair and ultimately unsuccessful to over concentrate any housing or social service effort in one or several neighborhoods.***"

The following is another assurance from the current Mayor that plans will be developed to evenly distribute public housing throughout Sacramento, not leave so much in the West Broadway, NWLP area. The decades of major and costly problems are well documented and agreed to by so many in public documentation. These facts must not be dismissed/overlooked.

From: MayorSacramento@mail.senecagov.com [<mailto:MayorSacramento@mail.senecagov.com>]
Sent: Tuesday, January 23, 2018 3:38 PM
To: Craig Chaffee
Subject: Re: FW: Sent following letter to Bee editors to publish and posted on our Next Door site.

Luis Montes has responded:

Dear Craig Chaffee,

*Thank you for contacting Mayor Darrell Steinberg's Office. We appreciate your willingness to share your thoughts and concerns with our office and we have forwarded your comments to the appropriate City staff. **The mayor agrees, it is necessary to have even distribution of public housing in all eight districts throughout Sacramento and in 2018, the mayor's goal is to increase the capacity to create an environment that spurs the construction of more public and affordable housing throughout all of Sacramento.** If you have any additional questions or concerns on this topic please do not hesitate to ask.*

Thank you, again, for contacting our office. Mayor Steinberg appreciates hearing from you.

Sincerely,

Luis Montes
Director of Constituent Affairs
Office of Mayor Darrell Steinberg
LMontes@cityofsacramento.org

From: Chaffee, Craig (MHSD-FMOR)@DHCS
Sent: Wednesday, July 25, 2018 12:33 PM
To: 'Scott Johnson' <SRJohnson@cityofsacramento.org>
Cc: Genevive Taylor <semperfitaylor@sbcglobal.net>; Craig Chaffee <cjchaffee@comcast.net>; Tom Buford <TBuford@cityofsacramento.org>
Subject: RE: Input as resident in NWLP area where you are planning development.

Dear Mr. Johnson,

Thank you for your responsiveness. Since 1980 when my wife and I moved to the little neighborhood ("Upper Land Park) with the 2 huge failed past century government projects (e.g., Seavey Circle and Alder Grove) we have been assured many times by government officials (e.g. past SHRA Director) that they understood that concentrating so much poverty and public housing in one little area (warehousing) was a failed government practice, and that at least half of the existing public housing units crammed in this one tiny little Sac area must be moved/integrated into other Sac areas using fair share principles. Yet, push comes to shove and NIMBY, the 2 huge projects have been left here by government, with all the major and costly problems – decade after decade. Below is a direct communication from the Mayor's Office on the issue. Must hard working tax paying homeowners all leave –seek higher safer ground? Will the City ever actually make good on their promises, or just build more of the same here, put more lipstick on the pig, and give it some fancy new name (e.g., Seavey Estates)? Again thank you for anything you can do to help affect real positive change for this very fragile community you now called North West Land Park.

Hi Craig,

Thanks for writing to the Mayor about the concern a of overconcentration of public housing in Upper Land Park.

I understand what I say does not carry the weight of what Darrell says or what I may communicate his position to be. To that end, here are Darrell's thoughts on the issue from him personally:

"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."

Warm regards,

Kelly F. Rivas
Campaign Manager

From: Scott Johnson <SRJohnson@cityofsacramento.org>
Sent: Wednesday, July 25, 2018 12:11 PM
To: Chaffee, Craig (MHSD-FMOR)@DHCS <Craig.Chaffee@dhcs.ca.gov>
Cc: Genevive Taylor <semperfitaylor@sbcglobal.net>; Craig Chaffee <cjchaffee@comcast.net>; Tom Buford <TBuford@cityofsacramento.org>
Subject: RE: Input as resident in NWLP area where you are planning development.

Dear Mr. Chaffee,

Thank you for your response to the Notice of Preparation (NOP) of an Environmental Impact Report for the West Broadway Specific Plan project. Your concerns will be included with responses and comments provided on the NOP to assist in the preparation of the draft environmental impact report.

Thank you,

Scott Johnson
City of Sacramento
Community Development Department
Environmental Planning Services
300 Richards Blvd., 3rd Floor
Sacramento, CA 95811
(916) 808-5842
srjohnson@cityofsacramento.org

From: Chaffee, Craig (MHSD-FMOR)@DHCS <Craig.Chaffee@dhcs.ca.gov>
Sent: Wednesday, July 25, 2018 12:01 PM
To: Scott Johnson <SRJohnson@cityofsacramento.org>
Cc: Genevive Taylor <semperfitaylor@sbcglobal.net>; Craig Chaffee <cjchaffee@comcast.net>
Subject: FW: Input as resident in NWLP area where you are planning development.

Dear Mr. Johnson,

I got the following email reply from Mr. Buford forwarding to you to make sure this was received "on time" for any community input deadline on this matter.

I am out of the office and will return Friday, August 3, 2018. If you need immediate assistance please contact Scott Johnson at srjohnson@cityofsacramento.org or phone at (916) 808-5842.

Thank You.

From: Chaffee, Craig (MHSD-FMOR)@DHCS

Sent: Wednesday, July 25, 2018 11:48 AM

To: 'tbuford@cityofsacramento.org' <tbuford@cityofsacramento.org>

Cc: 'Helen Selph' <HSelph@cityofsacramento.org>; 'Greg Sandlund'

<GSandlund@cityofsacramento.org>; 'Genevive Taylor' <semperfitaylor@sbcglobal.net>; 'Craig Chaffee' <cjchaffee@comcast.net>

Subject: Input as resident in NWLP area where you are planning development.

Dear Mr. Buford,

I was planning on attending the City/consultant meeting tonight on West Broadway/NWLP planning. But as a still working senior citizen (and grandparent) I'm not sure I'll brave the heat, and attend in person. So I'm offering some input here as a LONG TERM resident of the area. I've communicated numerous times with Helen Selph too. I find her responsive and informative. Most appreciated! She can likely share previous communications. Below I try to focus on CEQA/EIR related concerns. I've included Art Taylor – Board Member on our Land Park Community Association. Mr. Taylor has been very involved in the public housing issues for a long time.

Helen Selph communicated to me about possible CEQA 'Streamlining' on this project: "Detailed evaluation of potential residential and mixed use projects proposed under the Northwest Land Park Specific Plan will expedite the approval process for future projects that are consistent with the Northwest Land Park Specific Plan. Depending on the characteristics of future projects, streamlining under the Northwest Land Park Specific Plan EIR may range from a complete exemption to preparation of a focused, project-specific environmental document. (Please note that due to Federal funding requirements, any re-development of Marina Vista and Alder Grove public housing properties will require additional environmental review, including NEPA)."

My family has lived in the small surrounding fragile neighborhood since 1980.

I consulted a lawyer knowledgeable on CEQA/EIRs. The City and their consultants (partially hired because of their knowledge/experience on how to "fast track" CEQA/EIR reviews) should not try to use the 'fair share affordable housing' concept to fast track the CEQA/EIR reviews in an area already plagued with a gross over-concentration of public housing (PH) . That is political and hypocritical. That is not a correct use of the fair share concept for fast tracking CEQA/EIR reviews. Community has right to legally dispute the PH overconcentration /resulting community problems for decades using CEQA; such CEQA reviews can and should include socioeconomic issues too.

Here's some main points for the City/consultants.

- My family and most neighbors support the principles of fair share affordable housing.
- However, City/consultants should not try to use the fair share affordable housing concept to fast track the CEQA/EIR review in an area already plagued with a gross over-concentration of PH. Instead the City/consultants should use the fair share principles and facts about the existing overconcentration of public housing in this one little area to support long term plans to spread PH and other affordable housing throughout City AND County, not to keep it over-concentrated in this one little area

- Related City Council Reports (e.g., April 3, 2018) on funding these consultants and working on this West Broadway/NWLP plan say “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.” The final plan must accomplish this equitable distribution of affordable housing throughout Sacramento, not over-concentrating it here.
- The State Office of Environmental Health Hazard Assessment (OEHHA) shows that this specific West Broadway/NWLP area of Sacramento is one of the most polluted areas and negatively impacted by socioeconomic challenges in the County AND State. The overconcentration of public housing in this area drives OEHHA’s very troubling rankings of high poverty and unemployment, This little Sac area contains over 44% of all of SHRA’s PH units in the ENTIRE City limits, one of the largest concentrations of PH anywhere in the Western United States.
- EACH of the 2 PH projects is, by far, the largest in the entire Sacramento area. This unhealthy overconcentration is the result of the failed last century government policy of cramming too much public housing in one place – based on racism, NIMBY by more powerful neighborhoods accepting NONE/ZERO, and political expediency. And, right next door to these two huge PH projects, the City/SHRA converted a 75 unit apartment complex it promised the neighbors would always only be for seniors into all low-income all age units. The seniors left because the PH projects made it a dangerous area to live.
- For many decades the overconcentration in this one small Sacramento area has caused major problems for the project tenants, surrounding neighbors and taxpayers. This neighborhood became the most violent area in all of Sacramento in the early 90’s.
- The evidence is clear. Placing too much public housing in one little area results in major problems: Overconcentration of poverty, substance abuse and other mental health disorders, child neglect, crime, delinquency, poor education, unemployment and many others. It’s warehousing those in need.
- Sacramento must develop and implement a vision and plan to spread and integrate effective public and other affordable housing throughout Sacramento using fair share principles. Please don’t leave both of these two huge PH projects crammed in this one small Sacramento area.

Thank You. I appreciate my comments being recorded/ added to community input, and concerns addressed/mitigated.