File ID: 2026-00897 4/28/2026

Third-Party Appeals of Alhambra Redevelopment Project (P24-007) [Noticed 04/17/2026; Published 04/17/2026]

File ID: 2026-00897

Location: 320, 324, and 350 Alhambra Boulevard; 3005 and 3012 C Street; and 301, 311, 315, and 317 30th Street; APNs 003-0112-001, -002, -003, -004, -017, -018, -020, and -021; District 4

Recommendation: Conduct a public hearing and upon conclusion, pass a **Resolution** to approve: 1) California Environmental Quality Act (CEQA) Exemption pursuant to Public Resources Code section 21080.66; 2) Conditional Use Permit to exceed height standards of the residential preservation transition buffer zone of the Alhambra Corridor Special Planning District (SPD); 3) Site Plan and Design Review for the demolition of existing structures and construction of a six-story mixed -use development consisting of 2,400 square feet of ground-floor commercial and 332 multi-unit dwellings within the General Commercial (C-2-SPD) zone and Alhambra Corridor SPD; and 4) Tree Permit for the removal of seven city trees, two private protected trees, and the non-standard pruning of two city trees; thereby denying the third-party appeals.

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Presenter: Zach Dahla, Senior Planner, (916) 808-5584, zdahla@cityofsacramento.org, Community Development Department

Applicant: HRGA, Mary Woltering, 2277 Fair Oaks Boulevard, Studio 220, Sacramento, CA 95825

Appellant 1 of 2: Citizens for Positive Growth & Preservation, Stephen Cook; Brown Rudnick LLP, 4 Park Plaza, Suite 420, Irvine, CA 92614

Appellant 2 of 2: Casa Loma Terrace - East Sacramento Neighborhood Association, Carl Seymour; P.O. Box 160033, Sacramento, CA 95816

Property Owner: Demas Enterprises, LLC, John and George Demas, 8371 Carbide Court, Sacramento, CA 95828

Attachments:
1-Description/Analysis
2-Background
3-Resolution - Environmental and Entitlements
4-Exhibit A: Project Plans
5-Exhibit B: Arborist Report
6-Third-Party Appeal by Citizens for Positive Growth & Preservation Appeal
7-Third-Party Appeal by Casa Loma Terrace-East Sacramento Neighborhood Association
8-Staff Responses to Third-Party Appeals
9-Project Routing Responses
10-Letters of Support
11-Letters of Opposition
12-Historic Resources Report
13-Community-Sponsored Historic Review
14-Alhambra Redevelopment Public Resource Code 21080.66 Consistency Checklist
15-Appellant Presentation (Citizens for Positive Growth & Preservation)
16-Appellant Presentation (Casa Loma Terrace-East Sacramento Neighborhood Association)

Description/Analysis
Issue Detail: This item is an appeal of the Planning and Design Commission's decision to approve the Alhambra Redevelopment project, which proposes to develop a six-story, mixed-use building on a 2.26-acre site located within the General Commercial (C-2-SPD) zone and the Alhambra Corridor Special Planning District (SPD). The proposed building consists of 2,400 square feet of ground-floor commercial, 332 multi-unit dwellings, and a six-level parking garage comprised of an underground/basement level and five above-ground levels containing 322 total parking stalls. To accommodate the site redevelopment, the project requests the demolition of on-site structures, removal and non-standard pruning of trees, and the abandonment of Chinatown Alley. None of the on-site structures are currently listed on the Sacramento Register of Historic and Cultural Resources (Sacramento Register), the California Register of Historical Resources (California Register), or the National Register of Historic Resources. The on-site commercial warehouses at 320 and 324 - 350 Alhambra Boulevard have been deemed eligible for listing on the California Register due to their association with the Pureta Sausage Factory (and subsequently Mary Ann's Bakery).

This proposal requires the following entitlements:

1. **Conditional Use Permit.** The project site is located approximately 80 feet west of residential developments within the Single-Unit Dwelling (R-1-SPD) and Multi-Unit Dwelling (R-4-SPD) zones and Alhambra Corridor SPD. The Alhambra Corridor SPD establishes a residential preservation transition buffer zone with a reduced by-right height of 35 feet when located within 300 feet of a residential zone. Sacramento City Code (SCC) section 17.420.020.B allows for new developments to exceed this height limitation with a Conditional Use Permit

(CUP). As proposed, the mixed-use development is 62.75 feet tall with a five-foot parapet resulting in the need for a CUP to accommodate the height.

2. **Site Plan and Design Review.** Site Plan and Design Review is required to review the demolition of the residential and commercial warehouse structures as well as the construction of the mixed-use development and associated site improvements. No deviations to development standards are requested.

3. **Tree Permit.** The project requires a Tree Permit entitlement for the removal of seven City trees and two private protected trees that conflict with the location of the proposed buildings, driveways, and necessary infrastructure. A Tree Permit entitlement is also required for the non-standard pruning of two city trees to provide adequate building clearance.

The project was heard and approved by the Planning and Design Commission on February 12, 2026. Third-party appeals of the Planning and Design Commission's decision were timely filed on February 20, 2026, and February 23, 2026, which are discussed below.

Appeal Detail: Two third-party appeals of the Planning and Design Commission decision were received, including one from the Citizens for Positive Growth & Preservation and one from the Casa Loma Terrace - East Sacramento Neighborhood Association. The following outlines staff's review and response to each appeal.

Citizens for Positive Growth & Preservation

A full copy of the third-party appeal submitted by the Citizens for Positive Growth & Change is available in **Attachment 6.** The basis of the appeal is centered on the appellants' assertion that the project is not consistent with the City's General Plan and Zoning Ordinance and is ineligible for an exemption from the California Environmental Quality Act (CEQA) under Public Resources Code (PRC) section 21080.66. The appellant also states that the approval of a CUP to exceed the height limitation of the Alhambra Corridor SPD is improper and claims the project exceeds the applicable base zone height limits and is out of scale with the adjacent residential development. As such, the appellant requests that the City Council grant the appeal thereby denying the project.

Staff's recommendation to approve the project has not changed based on the issues raised by the Citizens for Positive Growth & Preservation. Based on staff's analysis of the appeal (**Attachment 8**), staff recommends the City Council deny the appeal thereby approving the project.

Casa Loma Terrace - East Sacramento Neighborhood Association

A full copy of the third-party appeal submitted by the Casa Loma Terrace - East Sacramento Neighborhood Association is available in **Attachment 7.** The appeal is centered on similar issues

raised in the letters of opposition staff received during the processing of the discretionary application. Specifically, the appellant identifies concerns with the height, design, and scale of the proposed development being out of character with the surrounding East Sacramento community, objections with the use of the PRC section 21080.66 statutory exemption, and concerns the project does not qualify for protections under the Housing Accountability Act. The appellant also states that the project is inconsistent with the General Plan, Alhambra Corridor SPD, and Alhambra Corridor Supplemental Design Guidelines due to the intensity of the development and associated increases in traffic, greenhouse gas emissions, and sewer flows.

Staff's recommendation to approve the project has not changed based on the issues raised by the Casa Loma Terrace - East Sacramento Neighborhood Association. Based on staff's analysis of the appeal (**Attachment 8**), staff recommends the City Council deny the appeal thereby approving the project.

Policy Considerations:

General Plan

The 2040 General Plan designation for the project site is Residential Mixed Use (RMU), which is intended to foster vibrant, walkable areas with a high-intensity mix of residential, commercial, office, and public uses, where daily errands can be accomplished on foot, by bicycle, or by transit. The RMU designation promotes housing mixed with retail and other community-serving uses to catalyze infill development of vacant and underutilized parcels. Allowable uses include a full range of residential, retail, employment, entertainment, cultural, and personal service uses serving a communitywide market, such as restaurants, apparel stores, specialty shops, theaters, bookstores, hotels and motels, and research and development facilities.

The project is consistent with the RMU designation as it facilitates the redevelopment of a large, underutilized city-block with a mixed-use development that introduces a new and denser housing product in a neighborhood that is close to transportation corridors, such as the Capital City Freeway and multiple Regional Transit bus routes, and educational and recreational amenities, such as the William McKinley Park and Library and Miwok Middle School. In addition to the project's consistency with the RMU designation, the project is also consistent with the following goals and policies from the 2040 General Plan:

Goal LUP-4. Walkable, transit-oriented centers and corridors that concentrate new jobs, housing, and entertainment opportunities to support frequent, reliable transit service and foster connected, accessible neighborhoods.

> **Policy LUP-4.2 Incentivizing Infill.** The City shall consider a range of incentives to attract development to centers, corridors, and sites, including the following:

- Prioritization of capital investment strategies for infrastructure, services, and amenities to support development;
- Economic incentives (e.g., fee reductions, regulatory exemptions, or tools such as enhanced infrastructure financing districts (EIFDs), Opportunity Zones, and Enterprise Zones);
- Streamlined development review, environmental review, and permitting processes;
- By-right entitlements for development projects consistent with applicable zoning;
- Ministerial approval of infill housing and mixed-use projects consistent with objective development and design standards;
- Public-private partnerships; and
- Proactive solicitation of development.

Policy LUP-4.6 Compatibility with Adjoining Uses. The City shall ensure that the introduction of higher-intensity mixed-use development along major arterial corridors is compatible with adjacent land uses, particularly residential uses, by requiring features such as the following:

- Buildings set back from rear or side yard property lines adjoining single-unit dwelling residential uses;
- Building heights stepped back from sensitive adjoining uses to maintain appropriate transitions in scale and to minimize impacts to privacy and solar access;
- Landscaped off-street parking areas, loading areas, and service areas screened from adjacent residential areas to the degree feasible; or
- Lighting shielded from view and directed downward to minimize impacts on adjacent residential uses.

Staff Response: The project is consistent with the goal and policies above in that the proposal facilitates infill development on a large, underutilized property with a mixed-use development that contributes positively to the fabric of the Alhambra Corridor. The proposed project promotes sustainable growth and change by proposing a higher-density multi-unit development with ground-floor commercial that diversifies the housing stock in an area comprised of mostly single-unit residential and smaller-scaled multi-unit and commercial developments. The proposed project also makes efficient use of land near educational, recreational, and commercial services, such as the William McKinley Park and Library and Miwok Middle School. The design of the buildings and site seeks to balance more intense urban uses with the lower-density neighborhood by placing the structured parking garage and vehicle access closer to the adjacent freeway (Capital City Freeway) and incorporating generous building step-backs at multiple levels along Alhambra Boulevard. The proposed development uses building step-backs to reduce the massing of the new structure in relation to the street and adjacent structures, while enhancing the visual interest along the residential street. The project incentivizes infill development by utilizing a recently adopted California Environmental Quality Act (CEQA) process authorized through Assembly Bill 130 (2025) (as codified in Public Resources Code section 21080.66); whereby qualifying projects are statutorily exempt from further CEQA review.

Goal LUP-6. A city of healthy, livable, “complete neighborhoods” that provide for residents’ daily needs within easy walking or biking distance from home.

Policy LUP-6.2 Range of Residential Development Intensities. The City shall allow for a range of residential development intensities throughout the community to cultivate a mix of housing types at varying sales price points and rental rates, provide options for residents of all income levels, and protect existing residents from displacement.

Policy LUP-6.3 Variety of Housing Types. The City shall promote the development of a greater variety of housing types and sizes in all existing and new growth communities to meet the needs of future demographics and changing household sizes, including the following:

- Single-unit homes on small lots
- Accessory dwelling units
- Tiny homes
- Alley-facing units
- Townhomes
- Lofts
- Live-work spaces
- Duplexes
- Triplexes
- Fourplexes
- Cottage/bungalow courts
- Neighborhood-scale multi-unit buildings
- Senior and student housing

Policy LUP-6.5 Established Neighborhoods. The City should encourage new development to respect the pedestrian-scale, pre-automobile form, and lush urban forest that typifies established neighborhoods and contributes to their sense of place.

Policy LUP-6.7 Architectural Variations. The City should encourage building placement variations, roofline variations, architectural projections, and other embellishments to enhance the visual interest along residential streets.

Staff Response: The project is consistent with the goal and policies above in that the proposal contributes to the variety of housing available in the area to meet the needs of various household sizes and income levels. Specifically, the project establishes a higher-density mixed-use development in an area concentrated with single-unit and smaller-scaled multi-unit developments and existing Sacramento Regional Transit bus routes, including Routes 67 and 68 at 30th and G Streets, Route 134 at Alhambra and McKinley Boulevards, and Route 30 at J and 30th Streets. The building incorporates vertical integration of uses by dedicating a portion of Alhambra Boulevard and D Street to ground-floor commercial tenant spaces with multi-unit residences

above. The commercial spaces will allow street activating uses, such as restaurants or services, to support the vibrancy of the pedestrian-oriented Alhambra Corridor and viability of the existing public transit options. The variety in materials (original brick, original steel stash windows, thin brick base, corrugated metal panels, cement board and plaster, and metal architectural elements) will provide a dynamic statement at the gateway into the downtown area and anchor the edge of East Sacramento.

Goal HCR-1. Historic and cultural resources that enrich our sense of place and our understanding of the City's prehistory and history.

Policy HCR-1.6 Early Project Consultation. The City will continue to strive to minimize impacts to historic and cultural resources by consulting with property owners, land developers, tribal representatives, and the building industry early in the development review process as needed.

Policy HCR-1.7 Contextual Features. The City shall promote the preservation, rehabilitation, restoration, and/or reconstruction, as appropriate, of contextual features related to historic resources, including maintenance and reconversion of parkway strips to landscaping; maintenance and replication of historic sidewalk patterns; use of historic streetlamps and street signs; and maintenance or restoration of historic park features.

Policy HCR-1.18 Evaluation of Potentially Eligible Built Environmental Resources. The City shall continue to evaluate all buildings and structures 50 years old and older for potential historic significance prior to approving a project that would demolish or significantly alter the resource.

Staff Response: The project is consistent with the goal and policies above in that staff identified the potential historic nature of the commercial warehouse buildings to the applicant team early in the development review process and required an evaluation of all structures proposed for demolition. The requested evaluation found the residential structures are not historic in nature but confirmed the commercial warehouses are eligible for listing on the California Register due to their association with the Pureta Sausage Factory. Based on this determination, the applicant team worked with staff and a historical resources consultant to refine the design of the development consistent with the Secretary of Interior Standards, including incorporating the character-defining features of the commercial warehouses into the design and ensuring new additions were appropriately setback from the historic elements and designed in a style that does not replicate the historic structures. A full analysis of how the new development is compatible with the Secretary of Interior Standards is available in ***Attachment 12.*** *The project also supports these policies related to historic preservation through the retention, restoration, and adaptive re-use of vacant and deteriorating buildings eligible for listing on the California Register that are a known fixture of the community. By doing so, the project has the ability to preserve the buildings and reintroduce members of the community to the now-inaccessible structures.*

Goal H-1. Facilitate the construction of 45,580 new housing units by 2029.

Policy H-1.1 Ensure Adequate Supply of Land. The City shall maintain an adequate supply of appropriately zoned land to accommodate the projected housing needs.

Policy H-1.4 Facilitate Infill Housing Development. The City shall facilitate infill housing along commercial corridors, near employment centers, near high-frequency transit areas, and in all zones that allow residential development as a way to revitalize commercial corridors, promote walkability and increased transit ridership, and provide increased housing options

Goal H-4. Create more equitable and inclusive neighborhoods.

Policy H-4.1 Expand Housing Types Throughout the City. The City shall take meaningful actions to allow for a greater array of housing types throughout the city to create more inclusive and equitable neighborhoods and to affirmatively further fair housing.

Staff Response: The project is consistent with the goals and policies above in that the project facilitates infill development by redeveloping an underutilized city-block with a higher-density multi-unit residential development with ground-floor commercial close to transportation corridors and educational and recreational amenities. The project diversifies the housing stock in an area of the City that is comprised of largely of single-unit residential and smaller-scaled multi-unit and commercial developments creating a more inclusive and equitable neighborhood through the expansion of housing types to meet the needs of various household sizes and income levels. While the project site was anticipated for 33 total units of lower-income housing in the City's Housing Element, the lower-income capacity on the remaining sites identified in the Housing Element is adequate to meet the jurisdiction's remaining low-income Regional Housing Needs Allocation (RHNA) for the 2021-2029 planning period. Thus, development of the project site at the proposed income level does not result in a loss of land to adequately accommodate the projected low-income housing needs of the City and the project is consistent with General Plan Policy H-1.1.

General Plan - Central City Community Plan

The subject property is located within the Central City Community Plan Area of the General Plan. The Central City encompasses about seven square miles at the core of the City of Sacramento, and includes Downtown, Midtown, Old Sacramento Waterfront, the Railyards, the River District, and a small portion of East Sacramento generally between the Capital City Freeway and Alhambra Boulevard. The General Plan envisions the Community Plan Area as the urban core of Sacramento that balances a revitalized riverfront; ample employment uses; cultural, historical, and tourist destinations; major sporting events; diverse and walkable neighborhoods with a variety of housing

options available to a wide range of income levels and preferences; and an efficient, convenient, and climate-friendly transportation system connects riders to a mix of uses. The Central City is a destination for tourists, rich with cultural and recreational attractions, and is the regional hub for economic and government institutions. The area consists of State government buildings, corporate offices and businesses, high-rise condominiums, historic neighborhoods, parks and recreational areas, nightlife, restaurant and shops, schools, and industrial and manufacturing complexes all within a treelined street grid. Higher intensity development is permitted throughout most of the Community Plan Area, while maintaining lower intensities that are in character with historic districts farther from transit.

Staff Response: *This project is consistent with the vision of the Community Plan Area in that the project promotes infill development on an underutilized parcel and is sensitive to the surrounding context in its form and massing and is compatible and supports existing development within the immediate vicinity and nearby. The Central City Community Plan does not have any applicable goals or policies that address the project or area. Given the project's consistency with the General Plan RMU designation and goals and policies from the 2040 General Plan, staff find the proposed project is also consistent with the Community Plan Area.*

200-Year Flood Protection

State Law (SB 5) and Planning and Development Code chapter 17.810 require that the City must make specific findings prior to approving certain entitlements for projects within a flood hazard zone. The project site is within a flood hazard zone and is an area covered by Sacramento Area Flood Control Agency (SAFCA)'s Improvements to the State Plan of Flood Control System, and specific findings related to the level of protection have been incorporated as part of this project. Even though the project site is within a flood hazard zone, the facilities of the State Plan of Flood Control or other flood management facilities protect the project to the urban level of flood protection. This is based on the SAFCA Urban Level of Flood Protection Engineer's Reports accepted by the City Council on October 21, 2025 (Resolution No. 2025-0283).

No Net Loss

The project is located on two sites (320 Alhambra Boulevard and 3012 C Steet) listed in the 2021-2029 Regional Housing Needs Allocation (RHNA) Housing Element Sites Inventory, which anticipate 33 total units of lower income housing. This project proposes 332 units of moderate-income housing. As of October 15, 2025, the lower income capacity on remaining sites identified in the Housing Element is 15,404, which is adequate to meet the jurisdiction's remaining low income RHNA of 13,406 for the 2021-2029 planning period. As the remaining sites identified in the Housing Element are adequate to meet the requirements of Section 65583.2 of the California Government Code and to accommodate the City's share of the regional housing need pursuant to Section 65584, this project is consistent with the Housing Element.

Public/Neighborhood Outreach and Comments: Staff routed the proposal to community groups within 500 feet of the site including: Civic Thread, Sacramento Area Bicycle Advocates, Preservation Sacramento, East Sacramento Community Association, Marshall-New Era Neighborhood Association, East Sac Gives Back, East Sacramento Chamber of Commerce, and East Sacramento Preservation. These community groups as well as property owners and current residents/businesses within 500 feet of the project site were sent a notice of the February 12, 2026, Planning and Design Commission meeting.

Staff received responses to the initial project routing from Civic Thread, Preservation Sacramento, and Sacramento Metropolitan Air Quality Management District, which are available in **Attachment 9**. In addition to routing the project to the above community groups for review, the applicant and staff also attended a community meeting at the Shepard Garden and Art Center on June 5, 2025.

Throughout the processing of the proposed project and appeal, staff has received 122 public comments on the project, including 33 letters of support and 89 letters of opposition. Public comments are included in the following attachments:

- **Attachment 10:** Letters of Support
- **Attachment 11:** Letters of Opposition

Below is a summary of the concerns identified in the letters of opposition followed by staff responses.

1. Concerns that the proposed **density** of the project is out of scale and inconsistent with the character of the existing community.

   Staff Response: Community members have expressed concerns that the project is much denser than the neighboring residential areas in East Sacramento which were developed at a much lower density.

   The project site is designated RMU in the City's General Plan and located within the C-2-SPD zone and Alhambra Corridor SPD. The City's General Plan building intensity standards (Maps LUP-6, -7, and -8) establish a minimum density requirement of 20 dwelling units per acre (du/ac) and a floor area ratio (FAR) range of 0.3 to 4.0. The project is not subject to any maximum density standards. At 147 du/ac and a FAR of 3.37, the project is consistent with the building intensity standards established by the General Plan and C-2-SPD zone. While staff recognizes the preference of some neighbors for fewer units, the Housing Accountability Act (HAA) is a State law that limits the ability of the city to deny, reduce the density of, or impose infeasible restrictions on housing developments that are consistent with the General Plan and zoning designations. As such, staff cannot require the project to reduce its density as it is consistent with the objective density standards of the General Plan and underlying C-2-SPD zone.

2. Concerns that the proposed development exceeds **height** restrictions of the Alhambra Corridor SPD.

   Staff Response: Community members have expressed concern that the height of the project exceeds the height restriction set by the Alhambra Corridor SPD.

   Sacramento City Code (SCC) section 17.216.720 establishes a maximum by-right height of 65 feet for the C-2 zone (base zone). The Alhambra Corridor SPD reduces the by-right maximum height to 35 feet when within 300 feet of a residential zone (measured from the street centerline) to protect residential neighborhoods from visual intrusion by new development that is out of scale with the adjacent residential neighborhood (SCC section 17.420.020.B). Projects may exceed this height restriction if authorized by a CUP approved by the Planning and Design Commission, provided that the height of the proposed building does not exceed the limits established by the applicable base zoning.

   The applicant team has requested a CUP to authorize the mixed-use development to exceed the 35-foot height restriction in the Alhambra Corridor SPD. At 62.75-feet, the height of the proposed building does not exceed the limits established by the applicable base zone.

   Overall, staff find the design of the mixed-use development, even with the additional height, is consistent with the purpose and intent of the Alhambra Corridor SPD buffer zone for the following reasons:

   i. *The mixed-use building is across an 80-foot right-of-way from existing single-unit development. There is one commercial building that will remain on the block, located at the northeast corner of 30th & D Street. The additional 28-feet of building height will not impact the privacy of adjacent rear yards or private open space.*
   ii. *The development reuses the façade of the existing brick warehouse structures, where feasible, maintaining the same context at the ground level.*
   iii. *Substantial building step-backs are incorporated into the upper floors along Alhambra Boulevard and portions of D Street and Chinatown Alley, including 10-to-25-foot setbacks from the original brick buildings at the second floor, then additional step-backs of 10-to-13.5 foot at the third floor and a 37-to 39-foot step-back at the fifth floor along Alhambra Boulevard. The multiple step-backs reduce the bulkiness of the building when viewed from the smaller-scaled residential development across the street and results in the development being more in-scale with the surrounding neighborhood.*
   iv. *The proposed step-backs comply with the height requirements in the underlying C-2 zone which apply everywhere else outside the Alhambra Corridor SPD. The building has a maximum height of 22.75 feet for portions of the building within zero to 39 feet of the R-1, R-1B, and R-2 zones, 43.5 feet for portions within 40 to 79 feet of the R-1, R-*

1B, and R-2 zones, and 62.5 feet for portions more than 80-feet from the R-1, R-1B, and R-2 zones, consistent with the transitional height requirements of the underlying C-2 zone (SCC section 17.216.120).

3. Concern the **architecture and scale** of the project is incompatible with the existing neighborhood character. Concern the proposed building design is inconsistent with the existing neighborhood and architectural character of East Sacramento, including the architecture-style, scale, and material use.

Staff Response: Staff offers the following in response to these concerns:

i. *Regarding height and step-backs, please see Staff Response (2) above.*
ii. *In response to community concerns, the applicant team redesigned the project to incorporate additional step-backs for the new vertical additions along Alhambra Boulevard and portions of D Street and Chinatown Alley, reducing the massing when viewed from the existing neighborhood.*
iii. *The brick façade of the original warehouse building is retained at the base of the new project, where feasible, maintaining material historic to the neighborhood. The materials utilized on other portions of the building include thin brick, corrugated metal panels, cement board and plaster, and metal architectural elements, materials commonly found within the surrounding neighborhood.*
iv. *Alhambra Corridor SPD and Alhambra Corridor Supplemental Design Guidelines do not objectively describe "neighborhood character" or include objective standards for architectural-style, scale, design aesthetic, and material use. In the absence of objective development standards related to "neighborhood character," the building has been reviewed for consistency with the development standards of the underlying C-2-SPD zone, Alhambra Corridor SPD, and the Alhambra Corridor Supplemental Design Guidelines. The building design is determined to provide sufficient architectural detail to meet those standards and staff believes the architecture and scale of the project will contribute positively to the visual quality of the surrounding community.*
v. *One of the stated goals of the Alhambra Corridor SPD is to, "Maintain the diverse character and housing opportunities provided in these urban neighborhoods," acknowledging that there is diversity of character already inherent in the neighborhood. New projects should maintain quality of design and materials, which staff believes this mixed-use project does.*
vi. *The General Plan identifies that the urban form characteristics of the RMU land use designation allow for denser developments with a higher-intensity mix of residential, commercial, office, and public uses. As proposed, the project would result in development consistent with the anticipated buildout of the site under the General Plan.*

The proposal also complies with the development standards of the C-2-SPD zone and Alhambra Corridor SPD and no deviations are requested.

4. Concerns that the adjacent Casa Loma Terrace Neighborhood is a **historic district** that will be impacted by the proposed project.

   *Staff Response: Community members have raised concerns that the project will impact the historical significance of the adjacent Casa Loma Terrace neighborhood. The City received multiple comments and a community-sponsored Historical Review prepared by Historic Environment Consultants (**Attachment 13**) asserting that the surrounding Casa Loma Terrace neighborhood qualifies as eligible for listing in the Sacramento, California, or National Registers, and that the proposed project would be incompatible with such a context.*

   The project is located on a parcel that has historically functioned as an industrial and commercial site, with the Pureta Sausage Factory, Mary Ann's Bakery, and related uses dating back to the early 20th century. It does not contain a substantial number of residential buildings, nor was it part of the Casa Loma Terrace subdivision or any early residential tract map. As such, the site would not be a contributing part of any potential residential historic district and would not impact the potential historic eligibility of the adjacent residences or district

   The City has reviewed the area in the context of multiple prior planning efforts and has not identified the area as eligible for district designation. The community-sponsored historical review does not adhere to the professional standards outlined by the National Register, such as Bulletin 24: Guidelines for Local Surveys; Bulletin 15: How to Apply the National Register Criteria for Evaluation; or the Guidelines for Defining Boundaries. Specifically, it does not establish a defensible period of significance, evaluate contributing versus non-contributing structures, identify building integrities, establish a framework for historical district boundary justification, or include a comparative analysis to contextualize the neighborhood in relation to other known historic districts or subdivisions in the City. The presence of older homes alone does not establish district eligibility. Rather, historical districts must demonstrate clear architectural cohesion, sufficient integrity, and contribute to the evolution or transition of a defined architectural type or period. Without an analysis of architectural integrity, alterations, or whether existing buildings collectively convey a unified sense of time and place, the comments received are insufficient as substantial evidence for the existence or eligibility of a historic district.

5. Concerns that the project results in the **demolition of residential structures** that are eligible historic resources.

   Staff Response: Pursuant to SCC section 17.604.600, the proposed demolition of the three single-unit residences and duplex building constructed between 1922 and 1935 were referred

*to the Preservation Director for a determination on whether the structures were eligible for consideration for listing on the Sacramento Register (pursuant to eligibility criteria and requirements established in SCC section 17.604.210). The Preservation Director considered Preservation Sacramento's comment letter (see **Attachment 9**), Historic Resources Evaluation (see **Attachment 12**) and the community-sponsored Historic Review (see **Attachment 13)** along with all public comments when evaluating the existing building's eligibility for listing on the Sacramento Register. As discussed in the Background section of this report, the Preservation Director has determined that the residential buildings do not represent a historical resource for the purposes of SCC section 17.604.600 (demolition of buildings or structures 50 years old or older) or CEQA. As such, the project would not result in the demolition of a historic building or require historic preservation of the existing residential structures.*

6. Concerns that the project does not provide enough **vehicle parking**.

   Staff Response: As proposed, the project provides 322 off-street vehicle parking spaces in a six-level parking garage accessed via 30th Street. This results in a parking ratio of 0.97 spaces per unit. Under the 2040 General, the City no longer requires a minimum number of vehicle parking spaces (Policy LUP 4.14) and no minimum parking for vehicles is codified in parking regulations established in SCC chapter 17.608. For this reason, staff do not find it reasonable or necessary to impose additional parking requirements on the proposed development.

7. Concerns with the **increased traffic** from the proposed development potentially resulting in excessive traffic hazards.

   Staff Response: The Fire Department and Department of Public Works have reviewed the project plans to confirm compliance with City Code for adequate site circulation, roadway design, emergency vehicle access, and intersection capacity. Based on their review, both departments have provided staff with conditions of approval to be imposed on the development. Based on discussions with Public Works staff, the traffic generated by the proposed project does not trigger the requirement for requiring the construction of additional traffic calming devices or changes to the roadway orientations.

8. Concerns with **overcrowding** the area with people.

   Staff Response: The project site is designated RMU in the City's General Plan and located within the C-2-SPD zone and Alhambra Corridor SPD. The City's General Plan building intensity standards (Maps LUP-6, -7, and -8) establish a minimum of 20 dwelling units per acre (du/ac) and a floor area ratio (FAR) range of 0.3 to 4.0. The project is not subject to any maximum density standards. At 147 du/ac and a FAR of 3.37, the project is consistent with the building intensity standards established by the General Plan and C-2-SPD zone. As such, the

proposal is consistent with the anticipated buildout of the site and would not result in overcrowding of the area with people.

9. Concerns that the project does not include **affordable housing**.

   Staff Response: While the City encourages developers to provide housing for a variety of incomes and household types, there is not a requirement to include income-restricted affordable housing as a part of this development.

10. Concerns with that the **site is hazardous** and not suitable for a mixed-use housing development.

    Staff Response: A Phase I Environmental Site Assessment (ESA) was prepared by Geocon Consultants, Inc. to identify recognized environmental conditions (RECs), controlled RECs (CRECs), and/or historical RECs (HRECs) associated with the project site. The Phase I ESA identified evidence of possible RECs caused by the storage, use, and potential on-site release of hazardous substances or petroleum products. Additionally, the Phase I ESA identified a closed leaking underground storage tank (LUST) case for the site as a HREC and an identified and unregistered underground storage tank (UST) as a REC. The project has been conditioned to implement the recommendations of the Phase I ESA. Implementation of these recommendations would address and mitigate all RECs, allowing the site to be suitable for residential development.

11. Concerns with that the project's **combined sewer** flows will cause overflows in East Sacramento.

    Staff Response: The City has received several comments concerning the potential for the existing sanitary sewer system to reach capacity and overflow. The Department of Utilities has imposed a condition of approval that includes a requirement that the developer provide a sewer study to evaluate whether the combined sewer system (CSS) main connecting to the project has sufficient capacity. If not sufficient, the developer would be required to upsize sewer mains as needed. The proposed project would also be subject to pay applicable development impact fees for the increased sewer impacts.

12. Concerns with the **lack of community outreach** opportunities.

    Staff Response: Community members raised concern with the lack of community outreach conducted by the applicant team. In response, City staff provided the applicant team with a list of the local neighborhood groups and recommended they reach out to schedule meetings with each group to solicit feedback from the community. A joint community meeting with the East Sacramento Community Association, East Sacramento Preservation, and the Casa Loma

Terrace-East Sac Neighborhood Association was held on June 5, 2025, where the applicant team listened to community feedback and City staff answered general questions about the planning process. City staff also routed the application to local neighborhood associations within 500 feet of the project site and actively responded to community inquiries throughout the planning process and encouraged the community to submit written comment letters to document their support or opposition the project.

Environmental Considerations: The City, as lead agency, is required to proceed with the environmental evaluation of projects after accepting an application as complete and determining that the project is subject to the California Environmental Quality Act (CEQA). The proposed Alhambra Redevelopment is a "project" as defined in the CEQA Guidelines Section 15060(b). Staff reviewed the application materials in accordance with CEQA Guidelines Sections 15060(c) and 15061 and has determined that the project qualifies for a statutory exemption pursuant to Public Resources Code (PRC) section 21080.66 as follows:

Public Resources Code section 21080.66

On June 30, 2025, the Governor signed Assembly Bill (AB) 130, which made significant changes as to how the California Environmental Quality Act (CEQA) applies to certain housing development projects in the State of California. AB 130 states it was designed to further "infill" multi-family housing development projects, other than single-family residential, and is part of a comprehensive legislative approach in response to the state's housing crisis. Section 21080.66 was added to the Public Resources Code by AB 130 and created a new statutory CEQA exemption for qualifying urban infill housing projects, streamlining approvals for infill housing developments. The legislature included the following that applies to section 21080.66:

> *"[AB 130] would exempt from the requirements of CEQA any aspect of a housing development project, as defined, including any permits, approvals, or public improvements required for the housing development project, as may be required by CEQA, if the housing development project meets certain conditions relating to, for example, size, density, location, and use, including specific requirements for any housing on the project site located within 500 feet of a freeway. This bill would require a local government to, within specified timeframes, provide formal notification to each California Native American tribe that is traditionally and culturally affiliated with the project site as an invitation to consult on the proposed project, as specified. The bill would require a local government, as a condition of approval for the development, to require the development proponent to complete a specified environmental assessment regarding hazardous substance releases. If a recognized environmental condition is found, the bill would require the development proponent to complete a preliminary endangerment assessment and specified mitigation based on that assessment."*

Section 21080.66(a) provides that CEQA does not apply to new housing development projects (i.e., projects where at least two-thirds of the square footage is residential) if the following conditions are met:

(1) (A) Except as provided in subparagraph (B), the project site is not more than 20 acres.
(B)The project site or the parcel size for a builder's remedy project, as defined in paragraph (11) of subdivision (a) of Section 65589.5 of the Government Code, or the project site or the parcel size for a project that applied pursuant to paragraph (5) of subdivision (a) of Section 65589.5 of the Government Code as it read before January 1, 2025, is not more than four acres.

(2) The project site meets either of the following criteria:

(A) Is located within the boundaries of an incorporated municipality.

(B) Is located within an urban area, as defined by the United States Census Bureau.

(3) The project site meets any of the following criteria:

(A) Has been previously developed with an urban use.

(B) At least 75 percent of the perimeter of the site adjoins parcels that are developed with urban uses.

(C) At least 75 percent of the area within a one-quarter mile radius of the site is developed with urban uses.

(D) For sites with four sides, at least three out of four sides are developed with urban uses and at least two-thirds of the perimeter of the site adjoins parcels that are developed with urban uses.

(4) (A) The project is consistent with the applicable general plan and zoning ordinance, as well as any applicable local coastal program as defined in Section 30108.6. For purposes of this section, a housing development project shall be deemed consistent with the applicable general plan and zoning ordinance, and any applicable local coastal program, if there is substantial evidence that would allow a reasonable person to conclude that the housing development project is consistent.

(B) If the zoning and general plan are not consistent with one another, a project shall be deemed consistent with both if the project is consistent with one.

(C) The approval of a density bonus, incentives or concessions, waivers or reductions of development standards, and reduced parking ratios pursuant to Section 65915 of the Government Code shall not be grounds for determining that the project is inconsistent with the applicable general plan, zoning ordinance, or local coastal program.

(5) The project will be at least one-half of the applicable density specified in subparagraph (B) of paragraph (3) of subdivision (c) of Section 65583.2 of the Government Code.

(6) The project satisfies the requirements specified in paragraph (6) of subdivision (a) of Section 65913.4 of the Government Code.

(7) The project does not require the demolition of a historic structure that was placed on a national, state, or local historic register before the date a preliminary application was submitted for the project pursuant to Section 65941.1 of the Government Code.

(8) For a project that was deemed complete pursuant to paragraph (5) of subdivision (a) of Section 65589.5 of the Government Code on or after January 1, 2025, no portion of the project is designated for use as a hotel, motel, bed and breakfast inn, or other transient lodging. For the purposes of this section, “other transient lodging” does not include either of the following:

(A) A residential hotel, as defined in Section 50519 of the Health and Safety Code.

(B) After the issuance of a certificate of occupancy, a resident’s use or marketing of a unit as short-term lodging, as defined in Section 17568.8 of the Business and Professions Code, in a manner consistent with local law.

Staff has reviewed the proposed housing development project against the requirements of Public Resources Code section 21080.66(a) and found there is substantial evidence to demonstrate the project satisfies the necessary conditions to exempt the project from further environmental review in accordance with the California Environmental Quality Act. This evidence is documented in a project-specific PRC 21080.66 Consistency Checklist available in **Attachment 14.** The PRC Section 21080.66 checklist describes the project-specific criteria that have been incorporated into the project design, or will be required as conditions of approval, to make the findings in the affirmative to exempt the project from further environmental review**.**

The full Alhambra Redevelopment Public Resource Code 21080.66 Consistency Checklist with all attachments, including the Historic Resources Assessment, Revised Pre-Development Arborist Report, and Phase I Environmental Site Assessment, is available on the City’s EIR

webpage at:

https://www.cityofsacramento.gov/community-development/planning/environmental/impact-reports

Commission/Committee Action: On February 12, 2026, the Planning and Design Commission considered and approved the project, consistent with staff's recommendation. Third-party appeals of the Planning and Design Commission's decision were timely filed on February 20, 2026, and February 23, 2026.

Rationale for Recommendation: Staff recommends the City Council approve the project, thereby denying the third-party appeals, based on the findings of fact and subject to the conditions of approval listed in Attachment 3. Staff's recommendation is based on findings that the project: a) is consistent with the established goals and implementing policies within the RMU designation, the C-2-SPD zone, and the Alhambra Corridor SPD; b) is appropriate for the site's characteristics and will not negatively impact surrounding properties as designed and conditioned; c) promotes sustainable growth and change by facilitating the infill development of a large, underutilized property with a higher-density mixed use development; d) revitalizes properties along the Alhambra Corridor through the retention, restoration, and adaptive re-use of vacant and deteriorating buildings eligible for listing on the California Register; and e) provides a vibrant street presence by engaging street frontages with commercial uses and quality design.

Financial Considerations: Not applicable.

Local Business Enterprise (LBE): No goods or services are being purchased under this report.

Economic Impacts: Not applicable.

Sustainability: Not applicable.

Background

Figure 1: Vicinity Map

Project Vicinity

The proposed project is located northwest of the intersection of D Street and Alhambra Boulevard at a ±2.26-acre site developed with two vacant commercial warehouses associated with the Pureta Sausage Factory, a surface parking lot, three single-unit dwellings, and one duplex dwelling in the General Commercial (C-2-SPD) zone and the Alhambra Corridor Special Planning District (SPD). The site consists of eight contiguous parcels and segment of Chinatown Alley generally bound by D Street to the south, Alhambra Boulevard to the east, 30th Street to the west, and C Street to the north. The project frontage is improved with existing curb, gutters, and sidewalks and features City street trees and unmetered street parking along the project frontages.

The site is located within the Alhambra Corridor of the Central City Community Plan, which consists of approximately 400 acres along the eastern extent of the Central City. The elevated Capital City Freeway serves as an edge between Midtown and East Sacramento. The Alhambra corridor is made up of several neighborhoods, each with its own character and distinct urban function, with uses consisting of single-unit and small-scaled multi-unit residential, retail commercial centers, low-rise office developments, hotels, storage facilities, and educational and recreational amenities (William McKinley Park and School, Miwok Middle School, Lincoln Law School). Land uses immediately adjacent to the project site include the Capital City Freeway to the west, single-unit and multi-unit residential to the east and south, and single-unit residential and a low-rise office building to the north.

Figure 1 identifies the project vicinity and Figure 2 identifies the zoning of the project site and surrounding area. Figures 3 – 7 highlight the existing site conditions

Figure 2: Zoning Map

Figure 3: Existing Conditions – Alhambra Boulevard and D Street

Figure 4: Existing Conditions – Alhambra Boulevard and C Street

Figure 5: Existing Conditions –30th Street and Chinatown Alley

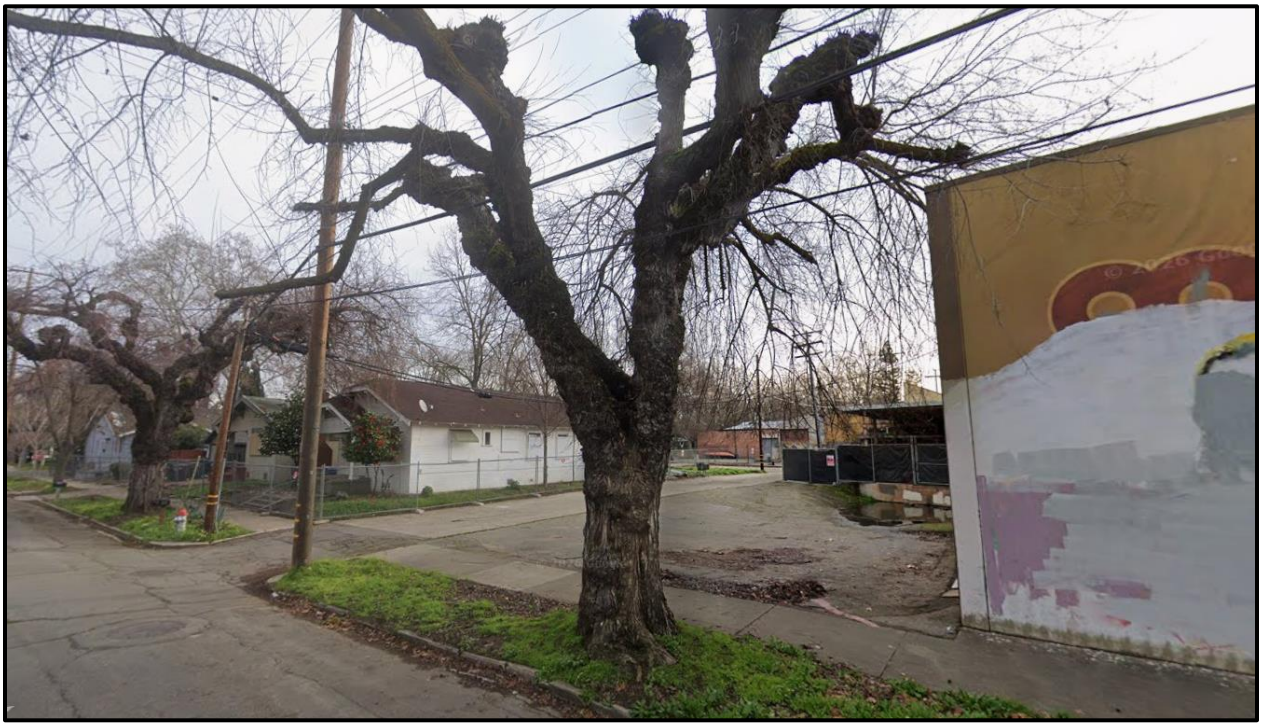


Figure 6: Existing Conditions –30th Street and C Street

Entitlement Review

The applicant is proposing to demolish the existing residential structures and stand-alone surface parking lot as well as the non-historic additions of the existing commercial warehouses to allow for the construction of a six-story mixed-use infill housing development. The 442,930 square foot building will be approximately 62.75 feet tall (68.17 feet to top of parapet) and include 332 multi-unit dwellings, 2,400 square feet of ground floor commercial retail/restaurant space, and 322 parking spaces located in a five-story, six-level parking garage along 30th Street. Vehicular access is provided by a new driveway connecting 30th Street to the parking garage. Up-ramps would be located on the west side of the parking garage and down-ramps would be located on the east side. To facilitate the site redevelopment, the applicant requests the removal of existing on-site trees and City Street trees within the public right of way, non-standard pruning of City trees, and abandonment of Chinatown Alley.

To accommodate the request, the project requires approval of three entitlements, including a Conditional Use Permit, Site Plan and Design Review, and Tree Permit.

Table 1: Project Information	
General Plan:	Residential Mixed Use (RMU) *FAR: 0.3 – 4.0* *Density (min): 20 du/ac*
Housing Element Inventory Site:	Yes – 33 lower income units
Community Plan:	Central City
Specific Plan:	n/a
Zone:	General Commercial (C-2-SPD)
Special Planning District:	Alhambra Corridor
Design Review District:	Alhambra Corridor
Parking District:	Urban
Historic Landmark:	No
Historic District:	No
Property Area:	98,663 square feet | ±2.26 acres
Gross Building Area:	Total: 442,390 square feet *Residential: 329,910 square feet* *Commercial: 2,400 square feet* *Garage: 110,080 square feet*
Floors:	6
Height:	62.75 feet *(68.17 feet to top of parapet)*
Density:	147 du/ac
FAR	3.37

Figure 7: Project Rendering – Alhambra Boulevard and D Street

Figure 8: Project Rendering – 30th and D Street

Figure 9: Transitional Height Exhibit

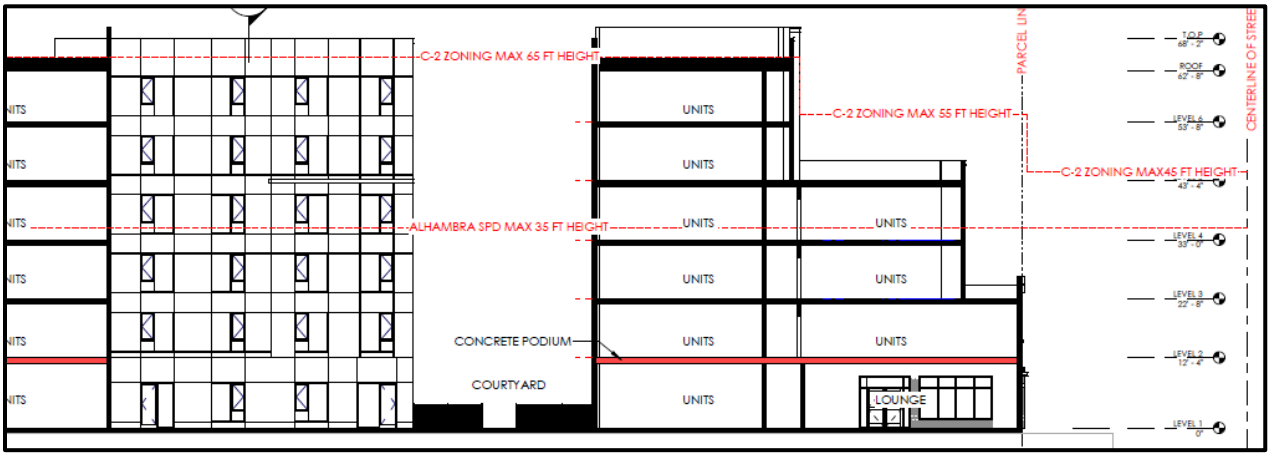


Figure 10: Streetscape Exhibit – D Street

Conditional Use Permit

The project site is located within the C-2-SPD zone and Alhambra Corridor SPD and is approximately 80 feet to the west of residential uses within the Single-Unit Dwelling (R-1-SPD) and Multi-Unit Dwelling (R-4-SPD) zones. Sacramento City Code (SCC) section 17.216.720 establishes a maximum by-right height of 65 feet for the C-2 zone (base zone). The Alhambra Corridor SPD reduces the by-right maximum height to 35 feet when within 300 feet of a residential zone (measured from the street centerline) to protect residential neighborhoods from visual intrusion by new development that is out of scale with the adjacent residential neighborhood (SCC section 17.420.020.B). Projects may exceed this height restriction if authorized by a Conditional Use Permit (CUP) approved by the Planning and Design Commission:

> *The planning and design commission may approve a conditional use permit allowing additional height, provided that the height may not exceed the limits established by the applicable base zoning chapter. To approve the conditional use permit, the planning and design commission must find that the development will not be out of scale with the adjacent residential*

neighborhood. An example where the intent of the buffer zone is maintained while allowing additional height is a development incorporating design features or step-backs that reduce the walled effect on adjacent smaller-scaled residential development. [City Code section 17.420.020(B)(2)]

The new building is proposed to be approximately 62.75 feet tall (68.17 feet to top of parapet). It is noted that the residential properties to the south across D Street are within the Residential Office (RO-SPD) zone and the residential properties to the north across C Street are within the General Commercial (C-2-SPD) zone, which are not considered residential zones. As such, staff's analysis of the CUP is focused on the building's compatibility with the residential uses along Alhambra Boulevard.

The Conditional Use Permit (CUP) process is designed to evaluate a project's potential impact on a site and the surrounding area. In evaluating the proposed building height, staff found the potential impacts to be minimal for the following reasons:

1. The mixed-use building is across an 80-foot right-of-way from existing single-unit development. There is one commercial building that will remain on the block, located at the northeast corner of 30th & D Street. The additional 28-feet of building height will not impact the privacy of adjacent rear yards or private open space.

2. The development reuses the façade of the existing brick warehouse structures, where feasible, maintaining the same context at the ground level.

3. Substantial building step-backs are incorporated into the upper floors along Alhambra Boulevard and portions of D Street and Chinatown Alley, including 10-to-25-foot setbacks from the original brick buildings at the second floor, then additional step-backs of 10-to-13.5 foot at the third floor and a 37-to 39-foot step-back at the fifth floor along Alhambra Boulevard. The multiple step-backs reduce the bulkiness of the building when viewed from the smaller-scaled residential development across the street and results in the development being more in-scale with the surrounding neighborhood.

4. The proposed step-backs comply with the height requirements in the underlying C-2 zone which apply everywhere else outside the Alhambra Corridor SPD. The building has a maximum height of 22.75 feet for portions of the building within zero to 39 feet of the R-1, R-1B, and R-2 zones, 43.5 feet for portions within 40 to 79 feet of the R-1, R-1B, and R-2 zones, and 62.5 feet for portions more than 80-feet

from the R-1, R-1B, and R-2 zones, consistent with the transitional height requirements of the underlying C-2 zone (SCC section 17.216.120).

5. The 2040 General Plan did anticipate development of the project site with uses consistent with the Residential Mixed Use land use designation at a minimum building density of 20 dwelling units per acre (du/ac) (General Plan Map LUP-8) and a maximum floor area ratio (FAR) of 4.0 (General Plan Map LUP-6). At 147 du/ac and a FAR of 3.37, the proposed development with the requested height exceedance does fall within the generally anticipated buildout of the development with uses consistent of the General Plan.

Staff supports the CUP request because the proposed use and its operating characteristics are consistent with general plan goals that encourage the aggregation of small parcels along high-quality transit corridors into larger development sites to facilitate their reuse as transit-oriented, higher-intensity residential, mixed-use developments. Further, the project is designed to be compatible with adjoining uses by incorporating substantial building height step-backs along Alhambra Boulevard and portions of D Street to maintain appropriate transitions in scale.

Site Plan and Design Review

The purpose and intent of the Site Plan and Design Review entitlement is to ensure the project proposal complies with the relevant development standards of the underlying zone, the C-2-SPD zone, in addition to making sure the horizontal and vertical design of the development is compatible and complementary to surrounding development and consistent with applicable design guidelines. The applicable design guidelines for the project site are the Alhambra Corridor Supplemental Design Guidelines.

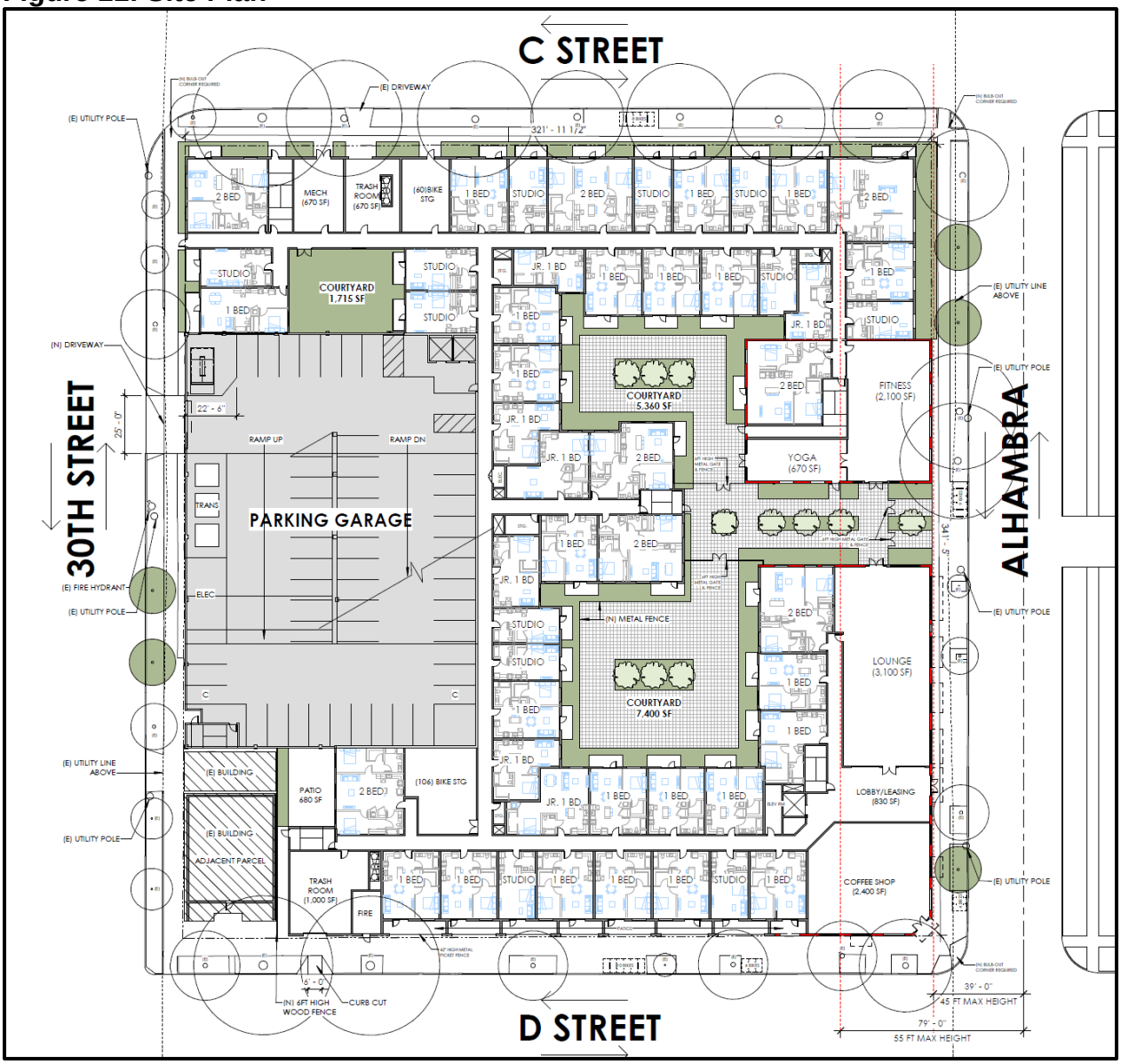
Site and Building Layout

The proposed mixed-use building includes 332 multi-unit dwellings, 2,400 square feet of ground floor commercial retail/restaurant space, and 322 parking spaces located in a five-story, six-level parking garage along 30th Street. The apartment units are spread across all six floors of the development and provided in five specific layouts, ranging in size from 505 square feet to 1,500 square feet, including:

- 505-squre-foot studio units (88)
- 560-square-foot junior-one-bed units (42)
- 740-square-foot one-bed units (134)
- 1,110-square-foot two-bed units (67)

- 1,500-square-foot three-bed unit (1)

Figure 11: Site Plan



The ground-floor commercial retail/restaurant space is proposed to occupy a prominent suite at the corner of D Street and Alhambra Corridor and features a clipped-corner entryway, original brickwork façade, and metal frame windows retained or replaced in-kind.

Pedestrian access to the interior residential areas is provided through doors on the ground floor, as well as through pedestrian gates west of the main outdoor courtyard. The main lobby and leasing office are accessed from Alhambra Boulevard, just north of the

proposed commercial retail/restaurant suite. The main lobby and leasing office would connect through internal hallways to residences as well as internal courtyards, bike storage, and amenities. An elevator and stairway are provided next to the lobby to access the upper levels, with additional stairwells at the end of each hallway.

Ground floor amenities for residents would consist of three centrally located outdoor courtyards (totaling 14,475 square feet), a lounge, fitness area, yoga area, private patio spaces, two trash rooms, and two bicycle storage rooms. The main courtyard would be accessed from the street on Alhambra Boulevard and from the internal hallways of the residential area, with six-foot-tall metal gates separating northern and southern portions of the courtyard from the main area. The northern courtyard would be 5,360 square feet, and the southern portion would be 7,400 square feet. A smaller 1,650-square-foot courtyard would share a wall with the parking garage within the northwestern section of the residential building. Eight private residential patios ranging in size from 79 square feet to 139 square feet would be located along the southern side of the building along D Street. Amenities above the ground floor would include co-working spaces on floors two through six, private patios and balconies for residential units, two fifth story rooftop patios ranging in size from 2,700 square feet and 3,730 square feet, and a sixth-story 10,069 square feet rooftop patio with a pool and spa above the parking structure.

Table 2: Summary of Existing Buildings/Structures

Address	Building Type	Date
311 30th Street	Single-Unit Residential	1922
315 30th Street	Single-Unit Residential	1925
3000 C Street / 301 30th Street	Duplex	1933
3004 C Street	Single-Unit Residential	1925
320 Alhambra Boulevard	Commercial Warehouses	1926
324 – 350 Alhambra Boulevard	Commercial Warehouses	1935

Demolition Review

SCC section 17.108.090 defines “demolition” of any structure 50 years old or older as either the complete demolition of the structures or the partial demolition of the structure that would remove an aggerate of 50 or more linear feet of exterior wall or more than 50% of the building’s footprint. As illustrated in Table 2, the project site contains residential structures constructed between 1922 and 1933 and commercial warehouse buildings constructed in 1926 and 1935. Pursuant to SCC section 17.604.600, the proposed

demolition of any of these buildings/structures shall be referred to the Preservation Director to make the determination of whether the structures are eligible for consideration for listing on the Sacramento Register of Historic and Cultural Resources (Sacramento Register) the eligibility criteria and requirements specified in SCC section 17.604.210. The Preservation Director meets the U.S. Secretary of the Interior Professional Qualification Standards for history and architectural history.

Historic Eligibility of Residential Structures

As proposed, the project would require the complete demolition of three single-unit dwellings and one duplex dwelling constructed between 1925 and 1933. The buildings are not currently listed on the California Register of Historic Places (California Register) or as a landmark on the Sacramento Register. Staff received a Historic Resource Evaluation report for the proposed project prepared by Groundwork Preservation (**Attachment 12**), which determined the residential structures do not meet the criteria for listing in the Sacramento Register or the California Register.

As the City's historic preservation specialist, the Preservation Director, has reviewed the report and all public comments submitted as part of the project and concluded the buildings at 311 30th Street, 315 30th Street, 3000 C Street / 301 30th Street, and 3004 C Street do not meet the qualifications for listing on the California Register or Sacramento Register as either an individual landmark or a contributing resource to a potential historic district and are not a historical resource for the purposes of the California Environmental Quality Act (CEQA). As such, the Preservation Director has concluded that the buildings do not represent a historical resource for the purposes of SCC section 17.604.600 (demolition of buildings or structures 50 years old or older) or CEQA. The Preservation Director does not oppose demolition of the residential structures on historical or environmental grounds.

Historic Eligibility of Commercial Structures

The project site contains two industrial/commercial warehouse buildings adjacent to Alhambra Boulevard and D Street associated with the Pureta Sausage Factory. This includes a 1926 one-story brick commercial and industrial building located at 320 Alhambra Boulevard northwest of the intersection of Alhambra Boulevard and Chinatown Alley and a 1935 one- and two-story brick commercial and industrial building at 324 – 350 Alhambra Boulevard. Given the age of the structures, staff requested the applicant team provide a historic resource evaluation for the project, which was prepared by Groundwork Preservation and available in **Attachment 12.** The report determined the original portions of the industrial/commercial warehouse buildings are eligible for listing in the California

Register and the Sacramento Register under Criterion 1 for their contributions to the local history of Sacramento, California and Northern California. As a major regional wholesaler, distributor, and manufacturer of processed meats from 1927-1969, the Pureta Sausage Factory served as one of the leading companies in the meatpacking industry in Sacramento. According to the historic resources evaluation, the character-defining features of the two industrial/commercial warehouses include:

- Brick construction
- One- and two-story massing
- Parapet wall
- Brick pattern
- Clipped corner entry
- Multi-paned, metal framed windows.

The proposed project would result in minimal changes to the character-defining features of the Pureta Sausage Factory buildings. Changes include the demolition of the interior features of both buildings, retention of the overall building envelope and form of 320 Alhambra Boulevard, and partial demolition of the non-contributing additions of 324-350 Alhambra Boulevard. A tiered vertical addition ranging from three to five stories would be added to both buildings. The additions are sufficiently set back from the historic building façades to ensure that the retained historic buildings read as one-to two-stories in height and the materials of the additions are differentiated such that they will read as contemporary elements. The Historic Resources Evaluation concluded that the project as designed is in substantial compliance with the Secretary of the Interior's Standards for Rehabilitation and would not cause a substantial adverse change in the significance of the historical resources as defined in CEQA Guidelines section 15064.5. As the City's historic preservation specialist, the Preservation Director, reviewed the report along with all public comments submitted as part of the project and concurs with the findings of the Historical Resources Evaluation. As such, staff does not oppose the demolition and alterations to the industrial/commercial warehouses to facilitate the adaptive reuse of the site.

Development Standards

The project is located within the C-2-SPD zone and the Alhambra Corridor SPD. As illustrated in Table 3 below, the project complies with the applicable development standards and no deviations are requested.

Table 3: Development Standards				
		Required	Project Site	
			Proposed	Deviation
Setbacks (min) (ft)	**Front-Yard** *(30th Street)*	0	0	No
	Street Side-Yard *(D Street)*	0	0	No
	Street Side-Yard *(C Street)*	0	0 – 4.75	No
	Rear-Yard *(Alhambra Boulevard)*	0	0 – 7	No
Height - C-2 Zone with CUP (max) (ft)		65	62.5	-
Height - Transitional[1] (max) (ft)	**0-39**	45	22.75	No
	40-79	55	43.5	No
	80+	65	62.5	No
Height - Roof Structure (max) (ft)		78	68.25	No
Open Space (sq ft)		33,200	40,852	No
Density (du/ac) (min)		20	147	-
Floor Area Ratio (FAR)		0.25 – 4.0	3.37	-
Parking	**Vehicle (min)**	n/a	322	-
	Bicycle – Long-Term	168	168	No
	Bicycle – Short-Term	35	35	No

1. *Transitional height refers to the height limits for portions of buildings in the C-2 zone within certain distances of the R-1, R-1B, and R-2 zone.*

Architectural Analysis

The site is subject to the Alhambra Corridor Supplemental Design Guidelines, which were developed to specifically address the form and function of the Corridor as well as of each neighborhood individually. The project site is located in an industrial neighborhood of the corridor, on a site anticipated for redevelopment and reuse. The six-story building features a contemporary architectural style that reflects the industrial nature of the site by retaining the original brick façades along Alhambra Boulevard, D Street, and Chinatown Alley while using a charcoal thin brick base for the new vertical additions. Above the thin brick base, corrugated metal panels and cement board and plaster applications are employed around a well fenestrated façade, featuring vinyl windows with decorative mullions and steel framing. The windows are placed in symmetrical fashion for each unit both vertically and horizontally, complimenting the horizontal cement board reveals.

The façade features a series of white, light grey, red/orange, and black color reversals coupled with slight variations in materials and setbacks to create a visual pattern effect in the façade treatment. The implementation of stacked balconies with both overhanging and flush designs, patterned Juliet balconies, steel awnings, transom windows, and architectural insets divert attention across the entire façade. The building provides substantial step-backs at the third floor and fifth floors, incorporating outdoor patio amenities into the design to reduce the bulkiness and visibility of the building height while providing architectural variation to divert attention across the façades. The project employs a parapet roof with slight height variations to maintain a strong horizontal roof form. The varying use of materials coupled with step-backs and varied parapet heights results in a well-articulated building with a modern aesthetic that references the simple, utilitarian design aesthetic of the original brick warehouses on-site. Overall, staff find the design of the mixed-use development consistent with the Alhambra Corridor Supplemental Design Guidelines.

Tree Permit

Pursuant to SCC chapter 12.56, the removal of private protected trees and city trees requires a Tree Permit. As identified by the arborist report, prepared by California Tree and Landscape Consulting Inc., dated October 23, 2024 (revised May 5, 2025) and other related exhibits, this project proposes to remove nine (9) regulated trees, including seven (7) city trees and two (2) private protected trees. The project also proposes non-standard pruning of two (2) city trees for building clearance. The following identifies the specific trees proposed for removal and non-standard pruning:

<u>City trees to be removed:</u>

- Tree #59878, American Elm, 38-inch DSH
- Tree #59879, American Elm, 38-inch DSH
- Tree #59888, Coast Redwood, 9-inch DSH
- Tree #59890, Chinese Pistache, 22-inch DSH
- Tree #59896, Zelkova, 30-inch DSH
- Tree #59897, London Plane, 18-inch DSH
- Tree #59903, London Plane, 20-inch DSH

<u>Private protected trees to be removed:</u>

- Tree #8591, Chinese Elm, 34-inch DSH
- Tree #8594, Pecan, 29-inch DSH

<u>City trees to receive non-standard pruning:</u>

- Tree #59887, London Plane, 42-inch DSH

- Tree #59902, London Plane, 14-inch DSH

The trees are proposed for removal because they conflict with the most reasonable placement of proposed buildings, driveways, and necessary infrastructure. The trees proposed for non-standard pruning require significant reduction for the purposes of building clearance. The applicant has provided a replacement plan that is consistent with the replacement requirement described in the Tree Planting, Maintenance and Conservation Ordinance. Urban Forestry has approved a replacement waiver for Trees #59878, #59888, #59896, #59897, and #59903 due to the condition and structural defects of these trees. The outstanding replacement requirement for trees removed from the right of way is 60 inches. The replacement plan proposes the planting equivalent of 10 inches diameter at standard height (DSH) in the form of new City street trees. The remaining replacement requirement of 50 inches shall be met with the payment of in-lieu fees. For the removal of 63 inches of private protected trees, the replacement plan proposes the planting the equivalent of 34 inches on-site in the form of new landscape trees. The remaining replacement requirement of 29 inches shall be met with the payment of in-lieu fees.

The total inches to be replaced with the payment of in-lieu fees is 79 inches, for a total of $25,675.00 to be paid to the Tree Planting and Replacement Fund. In-lieu fees are billed at the time that the entitlement is approved, and the fees are due upon receipt of the invoice.

RESOLUTION NO.

Adopted by the Sacramento City Council
Date Adopted

ADOPTING FINDINGS OF FACT AND APPROVING THE ALHAMBRA REDEVELOPMENT PROJECT (P24-007) 320, 324, AND 350 ALHAMBRA BOULEVARD 3005 AND 3012 C STREET; AND 301, 311, 315, AND 317 30TH STREET (APNS 003-0112-001, -002, -003, -004, -017, -018-, -020, AND -021)

BE IT ENACTED BY THE COUNCIL OF THE CITY OF SACRAMENTO:

BACKGROUND

A. On March 5, 2024, HRGA, submitted a development application for the Alhambra Redevelopment project (P24-007). The application included a request for a Conditional Use Permit, Site Plan and Design Review, and Tree Permit (Project).

B. On February 12, 2026, the Planning and Design Commission conducted a public hearing, for which notice was given pursuant to Sacramento City Code (SCC) chapter 17.812; received and considered evidence concerning the Project, and upon its conclusion approved with conditions the Project.

C. Pursuant to SCC sections 12.56.070.B, 17.808.130, 17.808.200.B.2, and 17.812.060, the decisions of the Planning and Design Commission may be appealed to the City Council.

D. On February 20, 2026, the Citizens for Positive Growth & Preservation filed a third-party appeal of the Planning and Design Commission decisions relating to the Project.

E. On February 23, 2026, the Casa Loma Terrace – East Sacramento Neighborhood Association filed a third-party appeal of the Planning and Design Commission decisions relating to the Project.

F. On April 28, 2026, the City Council conducted a public hearing, for which notice was given pursuant to SCC chapter 17.812, and received and considered evidence concerning the Project.

BASED ON THE FACTS SET FORTH IN THE BACKGROUND, THE CITY COUNCIL RESOLVES AS FOLLOWS:

Section 1. Based on the verbal and documentary evidence received at the hearing on the Project, the City Council **approves** the Project entitlements, thereby denying the third-party appeal, based on the findings of fact and subject to the conditions of approval as set forth below.

Section 2. The City Council **approves** the Project entitlements based on the following Findings of Fact:

A. **Environmental Determination:** Based on the determination and recommendation of the City's Environmental Planning Services Manager and the oral and documentary evidence received at the hearing on the project, the City Council finds that:

1. The Alhambra Redevelopment (project) is statutorily exempt from further environmental review pursuant to Public Resources Code (PRC) section 21080.66 as follows:

    i. The project meets the conditions of Public Resources Code section 21080.66(a) as follows:

        1. The project is a housing development project within the meaning of PRC section 21080.66(a).

        2. The project site is less than 20 acres as required by 21080.66(a)(1).

        3. The project site is located within the City of Sacramento (an incorporated municipality) as required by PRC section 21080.66(a)(2).

        4. The project site has been previously developed with urban uses and at least 75 percent of the perimeter of the site adjoins parcels that are developed with urban uses as required by PRC section 21080.66(a)(3).

        5. The project is consistent with the General Plan, General Commercial (C-2-SPD) zone, and the Alhambra Corridor Special Planning District (SPD) as required by PRC section 20180.66(a)(4).

        6. At 147 dwelling units per acre, the project will be at least one-half of

the applicable density specified in subparagraph (B) of paragraph (3) of subdivision (c) of Section 65583.2 of the Government Code as required by PRC section 20180.66(a)(5).

7. The project satisfies the requirements specified in paragraph (6) of subdivision (a) of Section 65913.4 of the Government Code, as follows:

    - The Project site is not located within a Coastal Zone as defined by PRC Section 30103.
    - The Project site is not located on prime farmland, farmland of statewide importance, or land zoned or designated for agricultural protection or preservation.
    - The Project site does not contain wetlands.
    - The Project Site is not located within a High or Very High Fire Hazard Severity Zone, as determined by the California Department of Forestry and Fire Protection (CAL FIRE).
    - The Project Site is not listed as a hazardous waste site, unless the Department of Toxic Substances Control (DTSC) has cleared the site for residential use or residential mixed uses.
    - The Project Site is within a delineated earthquake fault zone as determined by official maps published by the State Geologist, however the development will be required to obtain building permit(s), which will ensure compliance with applicable seismic protection building code standards adopted by the California Building Standards Commission.
    - The Project Site is not within a flood plain as determined by Federal Emergency Management Agency (FEMA) maps, unless the development has been issued a flood plain development permit.
    - The Project Site is not within a floodway as determined by FEMA maps, unless the development has received a no-rise certification.
    - The Project Site is not located on lands identified for

conservation in an adopted natural community conservation plan or habitat conservation plan.

- The Project Site does not contain habitat for protected species identified as candidate, sensitive, or species of special status by State or federal agencies, fully protected species, or species protected by the federal Endangered Species Act, California Endangered Species Act, or the Native Plant Protection Act.

- The Project Site is not located on lands under a conservation easement.

8. The Project does not require the demolition of a historic structure that was placed on a national, state, or local historic register before the date a preliminary application was submitted for the project pursuant to Section 65941.1 of the Government Code as required by as required by PRC section 21080.6(a)(7).

9. The Project was deemed complete on May 7, 2024, and no portion of the project is designated for use as a hotel, motel, bed and breakfast inn, or other transient lodging as required by PRC section 21080.66(a)(8).

ii. The Project meets the conditions of Public Resources Code section 21080.66(b) related to Tribal Consultation as follows:

1. The City distributed requests for Tribal Consultation to the applicable Native American tribes identified by the California Native American Heritage Commission (NAHC). Project notification letters were distributed to United Auburn Indian Community (UAIC), Wilton Rancheria, Shingle Springs Band of Mi-Wok Indians, and Buena Vista Rancheria of Me-Wuk Indians on April 3, 2024.

- A response was received from the UAIC on April 8, 2024, requesting consultation on the project. On May 21, 2024, UAIC closed consultation with the stipulation that a certified tribal monitor conduct periodic spot checks during ground disturbance at the site and the inclusion of an unanticipated discoveries mitigation measure.

- A response was received from Wilton Rancheria on April 8, 2024, requesting consultation for the project. On April 8,

2024, Wilton Rancheria closed consultation with the stipulation that a certified tribal monitor be on site during ground disturbance activities and that their inadvertent discovery treatment plan is included in the construction protocols for the project.

- A response was received from the Shingle Springs Band of Miwok Indians on July 30, 2024, requesting continued updates on the project, as well as the record searches and surveys conducted. Such materials were provided.

- Requests for consultation were not received from Buena Vista Rancheria of Me-Wuk Indian tribe.

- Additional responses were not received within the consultation period.

iii. The Project meets the conditions of Public Resources Code section 21080.66(c)(1) as follows:

1. A Phase I Environmental Site Assessment (ESA) was conducted for the Project by Geocon Consultant, Inc. which identified recognized environmental conditions.

2. As such, the City has conditioned the project to require the preparation of a Preliminary Endangerment Assessment as a condition of approval for the development, in accordance with PRC Section 21080.66(c)(1)(a).

3. Preparation of a Preliminary Endangerment Assessment ensures that, if needed, measures are identified to adequately mitigate the existence of any release of a hazardous substance on the site and/or any potential for exposure of future occupants to significant health hazards from any nearby property or activity to levels required by current federal and State statutory and regulatory standards.

4. The Project is conditioned to prepare the Preliminary Endangerment Assessment and complete any identified measures to mitigate hazards prior to the issuance of a certificate of occupancy consistent with the intent of PRC Section 21080.66(c).

iv. The project meets the conditions of Public Resources Code section

21080.66(c)(2) as follows:

1. The Project site is located within 500 feet of a freeway and has been conditioned to implement the following criteria in the Project as required by PRC section 21080.66(c)(2):

    - The building includes a centralized heating, ventilation, and air-conditioning (HVAC) system
    - The outdoor air intakes for the HVAC system faces away from the freeway.
    - The building provides air filtration media for outside and return air that provides a minimum efficiency reporting value of 16.
    - The air filtration media shall be replaced at the manufacturer's designated interval.
    - The building is not designed to include any balconies facing the freeway.

v. Upon approval of the Alhambra Redevelopment Project (P24-007), the Planning Director shall file or cause to be filed a Notice of Exemption with the Sacramento County Clerk and, if the project requires a discretionary approval from any state agency, with the State Office of Planning and Research, pursuant to section 21152(a) of the Public Resources Code and the State EIR Guidelines adopted pursuant thereto.

vi. Pursuant to Guidelines section 15091(e), the documents and other materials that constitute the record of proceedings upon which the Planning and Design Commission has based its decision, including the project's PRC section 21080.66 Consistency Checklist, are located in and may be obtained from, the Community Development Department at 300 Richards Boulevard, Third Floor, Sacramento, California 95811. The Planning Director is the custodian of records for all matters before the Planning and Design Commission.

B. The **Conditional Use Permit** to exceed height standards of the residential preservation transition buffer zone of the Alhambra Corridor Special Planning District (SPD) is **approved** based on the following Findings of Fact:

1. The proposed use and its operating characteristics are consistent with the general plan's Residential Mixed Use (RMU) land use designation, in that the height exceedance facilitates the redevelopment of a large, underutilized city-block with a residential mixed-use development at an intensity that is consistent with the allowable building intensity standards (i.e. density minimums and floor area ratio (FAR) range). The proposed use and its operating characteristics support and implement the General Plan designation's vision for compact, mixed-use developments that are compatible with adjacent lower-density neighborhoods by the project being designed to incorporate multiple building step-backs along Alhambra Boulevard, thereby reducing the massing of the new development in relation to the adjacent development. The project is also consistent with the general plan goals and policies related to sustainable growth and change, in that the project introduces a new and denser housing product in a neighborhood with existing infrastructure that is close to transportation corridors, such as the Capital City Freeway and multiple Regional Transit bus routes, and educational and recreational amenities, such as the William McKinley Park and Library and Miwok Middle School. The project diversifies the housing stock in an area comprised of mostly single-unit residential and smaller-scaled multi-unit and commercial developments consistent with General Plan Policy LUP-6.2, which promotes a range of residential development intensities throughout the City to cultivate a mix of housing types at varying sales price points and rental rates. There are no specific plans or transit village plans applicable to the site.

2. The proposed use and its operating characteristics are consistent with the applicable standards, requirements, and regulations of the zoning districts in which it is located, and of all other provisions of this title and this code, in that the project complies with all development standards of the General Commercial (C-2-SPD) zone and the Alhambra Corridor Special Planning District (SPD) and no deviations are requested. Both multi-unit residential and commercial uses are allowed uses permitted by-right within the C-2-SPD zone and Alhambra Corridor SPD, and the multi-unit residential use will be required to implement operational standards established in Sacramento City Code section 17.228.117 to ensure the development is maintained and operating efficiently. The project does not exceed the height limit for the base (C-2-SPD) zone, and the proposed height exceedance to the residential preservation transition buffer zone of the Alhambra Corridor SPD allows for a compatible mixed-use development that incorporates generous building step-backs at an intensity that is consistent with the allowable building intensity standards.

3. The proposed use is situated on a parcel that is physically suitable in terms of location, size, topography, and access, and that is adequately served by public services and utilities, in that the project location has been evaluated and conditioned to ensure safe access and designed to adequately fit the mixed-use development. The site is also adjacent to existing public and private utilities.

4. The proposed use and its operating characteristics are not detrimental to the public health, safety, convenience, or welfare of persons residing, working, visiting, or recreating in the surrounding neighborhood and will not result in the creation of a nuisance, in that the project has been designed to complement other nearby land uses, including adjacent single-unit and smaller-scaled multi-unit developments, by placing the structured parking garage and vehicle access closer to the adjacent freeway (Capital City Freeway). The project also incorporates generous building step-backs along Alhambra Boulevard and portions of D Street, which reduces the massing of the new development on the adjacent community and provides appropriate transitions in scale. The mixed-use development and its active spaces are oriented toward the street, public and common open spaces, creating natural “eyes on the street” safety surveillance. The proposed use also provides adequate pedestrian and bike pathways and integrates well with the existing neighborhood through appropriate scale, access and parcel orientation

C. **Site Plan and Design Review** for the demolition of existing structures and construction of a six-story mixed-use development consisting of 2,400 square feet of ground-floor commercial and 332 multi-unit dwellings within the General Commercial (C-2-SPD) zone and Alhambra Corridor SPD is **approved** based on the following Findings of Fact:

1. The design, layout, and physical characteristics of the proposed development are consistent with the general plan in that it is consistent with general plan goals that encourage infill development and sustainable growth by redeveloping a large, underutilized city-block with a residential mixed-use development at an intensity that is consistent with allowable building intensity standards (i.e. density minimums and floor area ratio (FAR) range). The proposed use and its operating characteristics support and implement the designations vision for compact, mixed-use developments that are compatible with the adjacent lower-density neighborhoods by designing the project to incorporate multiple building step-backs along Alhambra Boulevard to reduce the massing of the new development on the adjacent

community. The project is also consistent by introducing a new and denser housing product in a neighborhood with existing infrastructure that is close to existing Sacramento Regional Transit bus routes, such as Routes 30, 67, 68, and 134, and educational and recreational amenities, such as the William McKinley Park and Library and Miwok Middle School. The project also diversifies the housing stock in an area comprised of mostly single-unit residential and smaller-scaled multi-unit and commercial developments consistent with General Plan Policy LUP-6.2, which promotes a range of residential development intensities throughout the City to cultivate a mix of housing types at varying sales price points and rental rates. There are no specific plans or transit village plans applicable to the site.

2. The design, layout, and physical characteristics of the proposed development are consistent with all applicable design guidelines and with all applicable development standards or, if deviations from design guidelines or development standards are approved, the proposed development is consistent with the purpose and intent of the applicable design guidelines and development standards. The project complies with development standards of the C-2-SPD zone and the Alhambra Corridor SPD and no deviations to development standards are required. The project is also consistent with the Alhambra Corridor Supplemental Design Guidelines in that the project is in an industrial neighborhood, which is anticipated for site redevelopment and reuse in the Design Guidelines. The six-story, mixed-use building features a contemporary architectural style that reflects the industrial nature by retaining the original brick building facades along Alhambra Boulevard and a portion of D Street and Chinatown Alley. New vertical and horizontal additions incorporate high-quality materials such as corrugated metal, cement plaster, and a thin brick veneer colored gray to contrast and reference the historic red brick, and adheres to guidelines for landscaping, parking, and building orientation. No deviations from applicable standards are requested.

3. All streets and other public access ways and facilities, parking facilities, and utility infrastructure are adequate to serve the proposed development and comply with all applicable design guidelines and development standards, in that the proposed project provides onsite and offsite improvements to sufficiently serve this project and its users through appropriate stormwater management, extension of necessary public and private utility infrastructure, and landscaping improvements.

4. The design, layout, and physical characteristics of the proposed

development are visually and functionally compatible with the surrounding neighborhood in that the surrounding neighborhood is a mix of commercial, office and other employment generating uses. The project is designed to be compatible with adjoining uses by incorporating gracious building height step-backs along Alhambra Boulevard and portions of D Street to maintain appropriate transitions in scale. The proposed design also utilizes materials compatible with the Design Guidelines and are complementary to the visual appearance of other structures in the surrounding area.

5. The design, layout, and physical characteristics of the proposed development ensure energy consumption is minimized and use of renewable energy sources is encouraged in that the proposed development will comply with California's 2019 Building Energy Efficiency Standards (Title 24), which are designed to reduce energy demand. Energy-efficient lighting, heating, and cooling systems are also integrated into the design, reducing overall consumption. Further, the project will utilize existing road and utility networks.

6. The design, layout, and physical characteristics of the proposed development are not detrimental to the public health, safety, convenience, or welfare of persons residing, working, visiting, or recreating in the surrounding neighborhood and will not result in the creation of a nuisance, in that the project has been designed to complement other nearby land uses, including adjacent single-unit and smaller-scaled multi-unit and commercial developments, by placing the structured parking garage and vehicle access closer to the adjacent freeway (Capital City Freeway). The project also incorporates generous building step-backs along Alhambra Boulevard and portions of D Street to reduce the massing of the new development on the adjacent community and provide appropriate transitions in scale. The mixed-use development and its active spaces are also oriented toward the street, public and common open spaces, creating natural "eyes on the street" safety surveillance. The proposed use also provides adequate pedestrian and bike pathways and integrates well with the existing neighborhood through appropriate scale, access and parcel orientation.

D. The **Tree Permit** for the removal of seven (7) city trees and two (2) private protected trees, and the non-standard pruning of two city trees **is approved** based on the following Findings of Fact:

1. The location of the seven (7) city trees and two (2) private protected tree conflicts with the most feasible placement of proposed buildings, driveways,

and necessary infrastructure.

2. The replacement plan is consistent with the standards set forth in section 12.56.060 of the Tree Planting, Maintenance and Conservation Ordinance.

E. **200-Year Flood Protection**

1. The project site is within an area for which the facilities of the State Plan of Flood Control or other flood management facilities protect the project to the urban level of flood protection, as demonstrated by the Sacramento Area Flood Control Agency (SAFCA) Urban Level of Flood Protection Engineer's Reports accepted by the City Council on October 21, 2025 (Resolution No. 2025-0283).

F. **No Net Loss**

1. The project is located on two sites (320 Alhambra Boulevard and 3012 C Steet) listed in the 2021-2029 Regional Housing Needs Allocation (RHNA) Housing Element Sites Inventory, which anticipate 33 total units of lower income housing. This project proposes 332 units of moderate-income housing. As of October 15, 2025, the lower income capacity on remaining sites identified in the Housing Element is 15,404, which is adequate to meet the jurisdiction's remaining low income RHNA of 13,406 for the 2021-2029 planning period. As the remaining sites identified in the Housing Element are adequate to meet the requirements of Section 65583.2 of the California Government Code and to accommodate the City's share of the regional housing need pursuant to Section 65584, this project is consistent with the Housing Element.

Section 3. The City Council **approves** the Project entitlements subject to the following Conditions of Approval:

B. The **Conditional Use Permit** to exceed height standards of the residential preservation transition buffer zone of the Alhambra Corridor SPD is **approved** subject to the following Conditions of Approval:

PLANNING

D1. Development shall comply with the Site Plan and Design Review conditions of approval.

D2. The project approval allows for the construction of a mixed-use building at a height that exceeds 35 feet in the Alhambra Corridor SPD. The project

shall provide the approved setbacks, including the fifth story roof decks, along Alhambra Boulevard and portions of D Street and Chinatown Alley as shown on the final approved plans. Any modification(s) to the setbacks, building layout, and massing of the project shall be reviewed by Planning staff and may be subject to additional entitlements.

C. **Site Plan and Design Review** for the demolition of existing structures and construction of a six-story mixed-use development consisting of 2,400 square feet of ground-floor commercial and 332 multi-unit dwellings within the C-2-SPD zone and Alhambra Corridor SPD is **approved** subject to the following Conditions of Approval:

PLANNING

C1. The project approval allows for the construction of a mixed-use building with 332 multi-unit dwellings, ground floor commercial, and 322 parking stalls in a structured parking garage and landscaping improvements as shown on the final approved plans. Any modification(s) shall be reviewed by Planning staff and may be subject to additional entitlements.

C2. Any changes, additions, or modifications to the approved plans with respect to architectural design, layout, materials, setback, etc. shall require additional review and approval from Planning staff.

C3. The applicant shall obtain all necessary building and encroachment permits prior to commencement of construction.

C4. It is in the City's interest to prevent blight by maintaining existing development on a site until such time as new construction is undertaken as evidenced by issuance of building permits for new development. Therefore, the applicant shall not commence demolition until a building permit has been issued for the new structure. Given the condition of the existing buildings, the Planning Division, at their sole discretion, may authorize the demolition of existing structures at the request of the applicant.

C5. A pre-construction meeting shall be scheduled between the applicant, the applicant's contractor, and preservation staff to review the conditions and the methods of treatment. There shall also be an in-progress inspection conducted by preservation staff, scheduled once demolition activity is complete.

C6. The existing character-defining elements of the commercial warehouses at 320 and 324 – 350 Alhambra Boulevard shall be retained and protected, including:

a. Brick construction

b. One- and two-story massing

c. Parapet wall

d. Brick pattern

e. Clipped corner entry

f. Multi-paned, metal framed windows.

C7. All repairs to existing character defining materials and elements shall meet the Secretary of the Interiors Standards for the Treatment of Historic Properties. Specific repair and cleaning techniques shall be subject to review and approval by Preservation Staff during construction.

C8. Match in-kind means to match: design, dimensions, placement, materials and finishes.

C9. If existing windows need to be replaced to be operable, the applicant shall utilize metal sash windows with true divided lites subject to review and approval by Preservation Staff. If windows are replaced, the existing fenestration pattern and opening shall be maintained.

C10. Applicant shall submit product literature for windows and provide contractor qualifications for review and approval by Preservation Staff prior to procurement.

C11. Applicant shall submit product literature for doors and provide contractor qualifications for review and approval by Preservation Staff prior to procurement.

C12. Landscaping improvements including planters, trees, shrubs, and groundcover shall be constructed as indicated on the final approved plans. Any changes to the proposed landscaping plans shall be reviewed by Planning/Urban Forestry for approval.

C13. The owner or operator shall maintain landscaping and irrigation in a healthy and serviceable condition and the site shall be free of debris and weeds

C14. Building finishes shall be provided in accordance with the materials and colors shown on the approved plans. Building height, setbacks, and massing shall be consistent with the approved plans. All building elevations shall have a form and design consistent with the final approved plans.

C15. As shown on the approved elevations, exterior building materials and elements shall be:

a. Thin brick veneer

b. Aluminum/corrugated panels

c. Metal

d. Stucco

e. Anodized storefront window system with clear glass

C16. Glazing shall be provided as indicated on the approved elevations.

C17. All parking, driveway, curb, and sidewalk improvements shall be constructed as indicated on the approved plans.

C18. The project shall provide open space courtyards, rooftop decks, private balconies, and private patios as shown on the final approved plans. Any modifications to open space amenities shall be reviewed by planning staff to ensure the development provides a minimum of 33,200 square feet of open space as required by SCC section 17.600.135.

C19. This project shall provide a minimum of 35 short-term and 168 long-term bicycle parking spaces. Bicycle parking shall adhere to the City's Bike Rack Design and Placement Design Standards.

C20. Walls and Fences shall:

a. Be consistent with heights and locations shown on approved plans.

b. Comply with development standards in the Planning and Development code.

c. Conform to City standards for sight line requirements at intersections and driveways.

C21. All newly installed ground-mounted and roof-mounted mechanical equipment must be completely concealed from all adjacent and approaching right-of-way views. Construction documents shall clearly illustrate compliance. Placement of all exterior mechanical equipment, along with any necessary screening and details, must be shown on site plans, roof plans, and exterior elevations. Permanently supported solid, slatted, or louvered metal panel material only may be used. Openings in slatted material shall be less than 10%. Louvered material shall be positioned so spacing does not align with line of sight views. All material shall be painted to match elements of building exterior finish.

C22. All newly installed exterior wall-mounted and ground-mounted electrical service equipment, excluding transformers, must be completely concealed from all adjacent and approaching right-of-way views. Construction documents shall clearly illustrate compliance. Placement of all exterior electrical equipment, along with any necessary screening and details, must be shown on site plans, floor plans, and exterior elevations, while maintaining all service clearance requirements. Permanently supported solid, slatted, or louvered metal panel material only may be used. Openings in slatted material shall be less than 10%. All material shall be painted to match elements of building exterior finish.

C23. The agreements executed between the operator and tenants shall include a notification that parking is not included as a part of the lease. Furthermore, the agreement shall state that there is limited parking available in the neighborhood adjacent to the facility.

C24. The operator shall comply with the maintenance, repair, and operation standards for multi-unit dwellings pursuant to SCC section 17.228.117.

C25. Prior to final building occupancy of the first unit, the project shall be subject to an on-site inspection by Planning staff to ensure all conditions of approval are satisfied.

C26. All other notes and drawings on the final plans as submitted by the applicant are deemed conditions of approval. Any changes to the final set of plans approved by Urban Design staff shall be subject to review and approval prior to any changes.

C27. Provide light fixtures as shown on the final approved plans. Cutsheets of fixture specifications shall be provided during building permit plan check for review and approval by Planning staff. Project lighting shall comply with all applicable Sacramento City Code lighting regulations. Fixtures shall be unobtrusive and complementary to the architectural design of the building. Lighting shall be designed to not produce hazardous and annoying glare to motorists and building occupants, adjacent residents, or the general public. All fixtures should be placed in a manner that avoids glare when observed from the street or other public areas.

C28. A photometric plan shall be provided for all outdoor lighting in and around the site at the time of plan check. Any new building mounted lighting shall be subject to final review and approval by Planning staff.

C29. The applicant shall prepare a construction management plan prior to issuance of building permit for review and approval by the building division that addresses crane placement, potential encroachment into the public right of way, street closures, and potential effects on city street trees.

C30. Planning In-progress inspections (93) shall be called for prior to the following Building Inspections: Bldg-Foundation Forms (10), Bldg-Concrete Slab Forms (12), and Bldg-Frame (19). Coordinate with the assigned Planning staff (Planning Inspection Team).

C31. A Planning Final (89) shall be called for prior to Building Final (29). Coordinate with the assigned Planning staff (Planning Inspection Team).

C32. Prior to final building occupancy, the project shall be subject to an on-site inspection by Planning staff to ensure all conditions of approval are satisfied.

C33. Signage has not been reviewed as a part of this project approval. The applicant shall obtain a sign permit before the fabrication or installation of any signage for the development.

C34. This approval is valid for three years and is subject to SCC section 17.808.400.

ENVIRONMENTAL

C35. The project shall prepare a Preliminary Endangerment Assessment. The Preliminary Endangerment Assessment shall identify any measures needed to adequately mitigate the existence of any release of a

hazardous substance on the site and/or any potential for exposure of future occupants to significant health hazards from any nearby property or activity to levels required by current federal and State statutory and regulatory standards. The project shall submit the Preliminary Endangerment Assessment and evidence documenting completion of all identified measures prior to issuance of a certificate of occupancy.

C36. Prior to issuance of building permits, the project shall incorporate design measures/criteria outlined in Public Resources Code Section 21080.66(c)(2) as follows:

a. The building includes a centralized heating, ventilation, and air-conditioning (HVAC) system

b. The outdoor air intakes for the HVAC system faces away from the freeway.

c. The building provides air filtration media for outside and return air that provides a minimum efficiency reporting value of 16.

d. The air filtration media shall be replaced at the manufacturer's designated interval.

e. The building is not designed to include any balconies facing the freeway.

C37. Prior to the initiation of any ground disturbing activities, the project applicant shall show on project improvement plans via notation that the following Basic Construction Emission Control Practices/BMPs shall be implemented during all construction activities associated with the proposed project:

a. Water all exposed surfaces two times daily. Exposed surfaces include, but are not limited to soil piles, graded areas, unpaved parking areas, staging areas, and access roads;

b. Cover or maintain at least two feet of free board space on haul trucks transporting soil, sand, or other loose material on the site. Any haul trucks that would be traveling along freeways or major roadways should be covered;

c. Use wet power vacuum street sweepers to remove any visible track out mud or dirt onto adjacent public roads at least once a day. Use of dry power sweeping is prohibited;

d. Limit vehicle speeds on unpaved roads to 15 miles per hour (mph);

e. All roadways, driveways, sidewalks, parking lots to be paved should be completed as soon as possible. In addition, building pads should be laid as soon as possible after grading unless seeding or soil binders are used;

f. Minimize idling time either by shutting equipment off when not in use or reducing the time of idling to 5 minutes [California Code of Regulations (CCR), Title 13, sections 2449(d)(3) and 2485]. Provide clear signage that posts this requirement for workers at the entrances to the site;

g. Provide current certificate(s) of compliance for the California Air Resources Board (CARB)'s ln-Use Off-Road Diesel-Fueled Fleets Regulation (CCR, Title 13, Sections 2449 and 2449.1). For more information contact CARB at 877-593-6677, doors@arb.ca.gov, or www.arb.ca.gov/doors/compliance_cert1.html; and maintain all construction equipment in proper working condition according to manufacturer's specifications. The equipment must be checked by a certified mechanic and determined to be running in proper condition before it is operated

h. Proof of compliance with this measure shall be submitted to the City of Sacramento and Sacramento Metropolitan Air Quality Management District (SMAQMD) for review and approval.

C38. Prior to the initiation of ground disturbance, the project applicant shall show on project improvement plans via notation that the contractor shall ensure that:

a. the heavy-duty off-road vehicles (50 horsepower or more) to be used in the construction of the proposed project, including owned, leased, and subcontractor vehicles, shall be Tier 4 final off-road construction equipment.

b. All off-road equipment operating at the construction site must be maintained in proper working condition according to manufacturer's specifications.

c. Idling shall be limited to five minutes or less in accordance with the In-Use Off-Road Diesel Vehicle Regulation as required by CARB. Clear signage regarding idling restrictions shall be placed at the entrances to the construction site.

d. Portable equipment over 50 horsepower must have either a valid SMAQMD Permit to Operate (PTO) or a valid statewide Portable Equipment Registration Program (PERP) placard and sticker issued by CARB.

The aforementioned requirements shall be noted on grading plans and submitted for review and approval by the City of Sacramento Community Development Department.

C39. Purple Martin: If construction activities commence between February 1 and September 15, a pre-construction survey shall be conducted by a qualified biologist within 14 days of project construction for nesting purple martin within 0.25-mile of the project site. If nesting purple martin are not found, then further mitigation measures are not necessary. If active nests are found within 0.25-mile of the project site, the applicant shall maintain a 100-foot buffer around each active purple martin nest. Construction activities shall not be permitted in this buffer until a qualified biologist determines that the young have fledged or that the nesting attempt has failed. If an active purple martin nest is found within an on-site tree or structure, then the project applicant shall obtain any required permits from California Department of Fish and Wildlife (CDFW) and shall further implement additional mitigation as recommended by a qualified biologist based on CDFW guidelines. The results of the pre-construction survey shall be submitted to the City of Sacramento Community Development Director, or designee thereof, as applicable.

C40. Nesting Raptors and Other Migratory Birds: If tree removal or construction activities on the project site are to begin during the nesting season for raptors or other protected bird species in the region (generally February 1-September 15), a qualified biologist shall be retained by the project applicant to conduct pre-construction surveys in areas of suitable nesting habitat for common raptors and other bird species protected by the Migratory Bird Treaty Act (MBTA) or California Fish and Game Code located within 250 feet of project activity, as accessible. Surveys shall be conducted no more than 10 days before ground disturbance is expected to occur. The pre-construction surveys shall be submitted to the City's Community Development Department. If active nests are not found,

further mitigation is not required. If active nests are found, the construction contractor shall avoid impacts on such nests by establishing a no-disturbance buffer around the nest. The appropriate buffer size for all nesting birds shall be determined by a qualified biologist but shall extend at least 50 feet from the nest. Buffer size will vary depending on site-specific conditions, the species of nesting bird, nature of the project activity, the extent of existing disturbance in the area, visibility of the disturbance from the nest site, and other relevant circumstances.

Construction activity shall not occur within the buffer area of an active nest until a qualified biologist confirms that the chicks have fledged and are no longer dependent on the nest, or the nesting cycle has otherwise completed. Monitoring of the nest by a qualified biologist during construction activities shall be required if the activity has the potential to adversely affect the nest. The qualified biologist shall determine the status of the nest at least weekly during the nesting season. If construction activities cause the nesting bird to vocalize, make defensive flights at intruders, get up from a brooding position, or fly off the nest, then the no-disturbance shall be increased until the agitated behavior ceases.

C41. Prior to issuance of grading permits, the project applicant shall comply with Tree Permit requirements in effect at the time of project approval for removal, pruning, or soil disturbance within the canopy dripline of a private protected tree. The measures shall be reflected on the grading plans, subject to review and approval by the City's Planning and Design Commission. All removal activities shall be subject to the guidelines set forth in Chapter 12.56, Tree Planting, Maintenance, and Conservation, of the Sacramento City Code, which requires the acquisition of a Tree Permit prior to the removal of any tree.

C42. <u>Avoidance and Preservation Procedures in the Event of the Inadvertent Discovery of Cultural Resources:</u> If cultural resources (such as structural features, unusual amounts of bone or shell, artifacts, or human remains) are encountered at the project site during construction, work shall be suspended within 100 feet of the find (based on the apparent distribution of cultural materials), and the construction contractor shall immediately notify the project's City representative. Avoidance and preservation in place is the preferred manner of mitigating impacts to cultural resources. This will be accomplished, if feasible, by several alternative means, including:

a. Planning construction to avoid archaeological sites and/or other cultural resources; incorporating cultural resources within parks, green-space or other open space; covering archaeological resources; deeding a cultural resource to a permanent conservation easement; or other preservation and protection methods agreeable to consulting parties and regulatory authorities with jurisdiction over the activity.

b. Recommendations for avoidance of cultural resources will be reviewed by the City representative and other appropriate agencies, in light of factors such as costs, logistics, feasibility, design, technology and social, cultural and environmental considerations, and the extent to which avoidance is consistent with project objectives. Avoidance and design alternatives may include realignment within the project site to avoid cultural resources, modification of the design to eliminate or reduce impacts to cultural resources or modification or realignment to avoid highly significant features within a cultural resource.

c. If the discovered cultural resources can be avoided, the construction contractor(s), will install protective fencing outside the site boundary, including a 100-foot buffer area, before construction restarts. Use of temporary and permanent forms of protective fencing will be determined in consultation with Native American representatives from interested culturally affiliated Native American tribes.

d. The construction contractor(s) will maintain the protective fencing throughout construction to avoid the site during all remaining phases of construction. The area will be demarcated as an “Environmentally Sensitive Area.”

If a cultural resource cannot be avoided, the following performance standard shall be met prior to continuance of construction and associated activities that may result in damage to or destruction of cultural resources:

a. Each resource will be evaluated for California Register of Historical Resources- (CRHR) eligibility through application of established eligibility criteria (California Code of Regulations 15064.636), in consultation with consulting Native American Tribes, as applicable.

b. If a cultural resource is determined to be eligible for listing in the CRHR, the City will avoid damaging effects to the resource in accordance with California PRC Section 21084.3, if feasible. The City

shall coordinate the investigation of the find with a qualified archaeologist (meeting the Secretary of the Interior's Professional Qualifications Standards for Archeology) approved by the City. As part of the site investigation and resource assessment, the City and the archaeologist shall assess the significance of the find, make recommendations for further evaluation and treatment as necessary and provide proper management recommendations should potential impacts to the resources be determined by the City to be significant. A written report detailing the site assessment, coordination activities, and management recommendations shall be provided to the City representative by the qualified archaeologist. These recommendations will be documented in the project record.

C43. Implement Procedures in the Event of the Inadvertent Discovery of Human Remains: If an inadvertent discovery of human remains is made at any time during project-related construction activities or project planning, the following performance standards shall be met prior to implementing or continuing actions such as construction, which may result in damage to or destruction of human remains. In accordance with the California Health and Safety Code (HSC), if human remains are encountered during ground-disturbing activities, the City shall immediately halt potentially damaging excavation in the area of the remains and notify the Sacramento County Coroner and a professional archaeologist to determine the nature of the remains. The Coroner is required to examine all discoveries of human remains within 48 hours of receiving notice of a discovery on private or State lands (HSC Section 7050.5[b]).

a. If the human remains are of historic age and are determined to be not of Native American origin, the City will follow the provisions of the HSC Section 7000 (et seq.) regarding the disinterment and removal of non-Native American human remains.

b. If the Coroner determines that the remains are those of a Native American, he or she must contact the Native American Heritage Commission (NAHC) by phone within 24 hours of making that determination (HSC Section 7050[c]). After the Coroner's findings have been made, the archaeologist and the NAHC-designated Most Likely Descendant (MLD), in consultation with the landowner, shall determine the ultimate treatment and disposition of the remains. The responsibilities of the City for acting upon notification of a discovery of

Native American human remains are identified in California PRC Section 5097.9 et seq.

C44. Prior to approval of any grading permits, a design-level Geotechnical Analysis shall be conducted by a California Registered Civil Engineer or Geotechnical Engineer to characterize the subsurface conditions of the project site. The report shall address and make recommendations on the following:

a. Road, pavement, and parking area design;

b. Structural foundations, including retaining wall design (if applicable);

c. Grading practices;

d. Erosion/winterization;

e. Special problems discovered on-site, (i.e., groundwater, expansive/unstable soils, etc.);

f. Subsidence and settlement potential; and

g. Slope stability.

All grading and foundation plans for the development shall be designed by a Civil and Structural Engineer and reviewed and approved by the Director of Public Works/City Engineer, Chief Building Official, and a qualified Geotechnical Engineer prior to issuance of grading and building permits to ensure that all geotechnical recommendations specified in the Geotechnical Analysis are properly incorporated and utilized in the project design. The design-level Geotechnical Analysis shall be submitted to the City of Sacramento Community Development Department.

C45. In the event that a paleontological resource is inadvertently discovered during project-related work, regardless of the depth of excavation or location, work shall be halted within 50 feet (15 meters) of the find and a qualified paleontologist (Society of Vertebrate Paleontology [SVP] 2010) and the City of Sacramento Community Development Department shall be notified. The resources shall be examined by the qualified paleontologist at the developer's expense, for the purpose of recording, protecting, or curating the discovery as appropriate. Construction activities could continue in other areas.

If the find is determined to be significant under SVP criteria, the find shall be left in place without further disturbance, or if avoidance is not feasible, then additional work, such as fossil recovery excavation (salvage) and curation at a certified repository, such as the University of California Museum of Paleontology (UCMP), may be warranted and would be discussed in consultation with the City of Sacramento Community Development Department, and any other relevant regulatory agency, as appropriate. The qualified paleontologist shall submit to the City of Sacramento Community Development Department for review and approval a report of the findings and method of curation or protection of the resources.

C46. During grading and construction activities, the applicant shall obtain a permit from the Sacramento County Environmental Management Department (SCEMD) and hire a licensed contractor to properly remove the identified UST in consultation with SCEMD, subject to review and approval by the Sacramento County Environmental Health Department. If soils suspected of being contaminated are encountered in association with the USTs, the soils shall be removed in accordance with Regional Water Quality Control Board (RWQCB) guidelines. Further remediation, if necessary, and disposal of the soils shall be conducted in accordance with State and federal guidelines, subject to verification by the City of Sacramento Community Development Department.

C47. If indicators of apparent soil contamination (soil staining, odors, debris fill material, etc.) are encountered within the project site, the impacted area(s) should be isolated from surrounding, nonimpacted areas. The project environmental professional shall obtain samples of the potentially impacted soil for analysis of the contaminants of concern and comparison with applicable regulatory residential screening levels (i.e., Environmental Screening Levels, California Human Health Screening Levels, Regional Screening Levels, etc.). Where the soil contaminant concentrations exceed the applicable regulatory residential screening levels, the impacted soil shall be excavated and disposed of offsite at a licensed landfill facility to the satisfaction of the City of Sacramento Community Development Department.

C48. Prior to issuance of a demolition permit for on-site structures, the project applicant shall consult with certified Asbestos and/or Lead Risk Assessors to complete and submit for review to the Building Department an asbestos and lead survey. If asbestos-containing materials or lead-containing

materials are not discovered during the survey, further mitigation related to asbestos-containing materials or lead-containing materials shall not be required. If asbestos-containing materials and/or lead-containing materials are discovered by the survey, the project applicant shall prepare a work plan to demonstrate how the on-site asbestos-containing materials and/or lead-containing materials shall be removed in accordance with current California Occupational Health and Safety (Cal-OSHA) Administration regulations and disposed of in accordance with all California Environmental Protection Agency (CalEPA) regulations, prior to the demolition and/or removal of the on-site structures. The plan shall include the requirement that work shall be conducted by a Cal-OSHA registered asbestos and lead abatement contractor in accordance with Title 8 CCR 1529 and Title 8 CCR 1532.1 regarding asbestos and lead training, engineering controls, and certifications. The applicant shall submit the work plan to the City of Sacramento for review and approval. The City has the right to defer the work plan to the Sacramento County Department of Environmental Health for additional review. Materials containing more than one (1) percent asbestos that is friable are also subject to SMAQMD regulations. Removal of materials containing more than one (1) percent friable asbestos shall be completed in accordance with SMAQMD Section 11-2-303.

C49. Prior to issuance of any grading permits, the contractor shall prepare a Storm Water Pollution Prevention Plan (SWPPP) for review and approval by the Central Valley RWQCB. The contractor shall file the Notice of Intent (NOI) and associated fee to the California State Water Resources Control Board (SWRCB). The SWPPP shall serve as the framework for identification, assignment, and implementation of best management practices (BMPs). The contractor shall implement BMPs to reduce pollutants in stormwater discharges to the maximum extent practicable. Construction (temporary) BMPs for the project may include, but are not limited to: fiber rolls, straw bale barrier, straw wattles, storm drain inlet protection, velocity dissipation devices, silt fences, wind erosion control, stabilized construction entrance, hydroseeding, revegetation techniques, and dust control measures. The SWPPP shall be submitted to both the City Director of Public Works, and the City Engineer for review and approval and shall remain on the project site during all phases of construction. Following implementation of the SWPPP, the contractor shall subsequently demonstrate the SWPPP’s effectiveness and provide for necessary and appropriate revisions, modifications, and improvements to

reduce pollutants in stormwater discharges to the maximum extent practicable.

C50. Prior to approval of grading permits, the City shall establish the following as conditions of approval for any permit that results in the use of construction equipment:

a. Construction shall be limited to 7:00 AM and 6:00 PM, on Monday, Tuesday, Wednesday, Thursday, Friday and Saturday, and between 9:00 AM and 6:00 PM on Sundays;

b. All construction equipment powered by internal combustion engines shall be properly muffled and maintained;

c. Quiet construction equipment, particularly air compressors, shall be selected whenever possible;

d. All stationary noise-generating construction equipment, such as generators or air compressors, shall be located as far as is practical from existing residences. In addition, such stationary construction equipment shall be placed so that noise is directed away from the sensitive receptors nearest to the project site;

e. Unnecessary idling of internal combustion engines shall be prohibited; and

f. The construction contractor shall, to the maximum extent practical, locate on-site equipment staging areas to maximize the distance between construction-related noise sources and noise-sensitive receptors nearest the project site during project construction.

Proof of compliance with the above measures shall be submitted to the City of Sacramento Community Development Department for review.

C51. Any compaction required within 26 feet of existing structures adjacent to the project site shall be accomplished by using static drum rollers, rather than vibratory compactors/rollers, which use weight instead of vibrations to achieve soil compaction. As an alternative, preconstruction crack documentation and construction vibration monitoring could be conducted to ensure that construction vibrations do not cause damage to any adjacent structures. The above requirements shall be included via notation on any future improvement plans approved for the proposed project to the satisfaction of the City’s Community Development Department.

C52. In the event that tribal cultural resources (TCRs) are discovered during construction, the project shall implement procedures to evaluate tribal cultural resources and implement avoidance and minimization measures:

a. If any suspected TCRs or resources of cultural significance to UAIC, Wilton Rancheria, Shingle Springs Band of Mi-Wok Indians, and Buena Vista Rancheria of Me-Wuk Indians, or other Native American Tribes, including but not limited to features, anthropogenic/cultural soils, cultural belongings or objects (artifacts), shell, bone, shaped stones or bone, or ash/charcoal deposits are discovered by any person during construction activities including ground disturbing activities, all work shall pause immediately within 100 feet of the find, or an agreed upon distance based on the project area and nature of the find. Work shall cease in and within the immediate vicinity of the find regardless of whether the construction is being actively monitored by a Tribal Monitor, cultural resources specialist, or professional archaeologist.

b. A Tribal Representative and the City of Sacramento shall be immediately notified, and the Tribal Representative in coordination with the City of Sacramento shall determine if the find is a TCR (PRC §21074) and the Tribal Representative shall make recommendations for further evaluation and treatment as necessary.

c. Treatment and Documentation:

    i. The culturally affiliated Tribe shall consult with the City of Sacramento to (1) identify the boundaries of the new TCR and (2) if feasible, identify appropriate preservation in place and avoidance measures, including redesign or adjustments to the existing construction process, and long-term management, or 3) if avoidance is infeasible, a reburial location in proximity of the find where no future disturbance is anticipated. Permanent curation of TCRs will not take place unless approved in writing by the culturally affiliated Tribe.

    ii. The construction contractor(s) shall provide secure, on-site storage for culturally sensitive soils or objects that are components of TCRs that are found or recovered during construction. Only Tribal Representatives shall have access to the storage. Storage size shall be determined by the nature of the TCR and can range from a small lock box to a conex box (shipping container). A secure

(locked), fenced area can also provide adequate on-site storage if larger amounts of material must be stored.

iii. The construction contractor(s) and City of Sacramento shall facilitate the respectful reburial of the culturally sensitive soils or objects. This includes providing a reburial location that is consistent with the Tribe's preferences, excavation of the reburial location, and assisting with the reburial, upon request.

iv. Any discoveries shall be documented on a Department of Parks and Recreation (DPR) 523 form within 2 weeks of the discovery and submitted to the appropriate California Historical Resources Information System (CHRIS) center in a timely manner.

v. Work at the TCR discovery location shall not resume until authorization is granted by the City of Sacramento in coordination with the culturally affiliated Tribe.

vi. If articulated or disarticulated human remains, or human remains in any state of decomposition or skeletal completeness are discovered during construction activities, the County Coroner and the culturally affiliated Tribe shall be contacted immediately. Upon determination by the County Coroner that the find is Native American in origin, the Native American Heritage Commission will assign the Most Likely Descendent who will work with the project proponent to define appropriate treatment and disposition of the burials.

C53. Tribal Monitors and Monitoring: The project proponent or their construction manager shall comply with the foregoing measure to assist with identification of TCRs at the earliest possible time during project-related earthmoving activities:

a. The project proponent shall reach out to qualified Native American Tribal Monitors [one option is to contact the UAIC Tribal Historic Preservation Officer (THPO) (thpo@auburnrancheria.com)] a reasonable amount of time prior to project ground-disturbing activities to retain the services of a qualified Native American Tribal Monitor(s). The duration of the construction schedule and Tribal Monitoring shall be determined at this time.

b. A contracted Tribal Monitor(s) shall monitor the vegetation grubbing, stripping, grading, trenching, and other ground-disturbing activities in the project area. All ground-disturbing activities, including rebuild or previously disturbed, shall be subject to Tribal Monitoring unless otherwise determined unnecessary by the contracted Tribal Monitor.

c. Tribal Monitors or Tribal Representatives shall have the authority to direct that work be temporarily paused, diverted, or slowed within 100 feet of the immediate impact area if sites, cultural soils, or objects of potential significance are identified. The temporary pause/diversion shall be of an adequate duration for the Tribal Representative to examine the resource.

d. Appropriate treatment of TCRs may include but is not limited to:

    i. Recordation of the resource(s)

    ii. Avoidance and preservation of the resource(s)

    iii. Recovery and reburial of the resource(s) onsite or in a feasible off-site location in a designated area subject to no future disturbance. The location of the reburial shall be acceptable to the appropriate Tribal THPO or their representative.

e. To track the implementation of this measure, the Tribal Monitor(s) shall document field-monitoring activities on a Tribal Monitor log. The Tribal Monitor shall provide a copy of the log to the City of Sacramento for mitigation compliance verification.

f. The Tribal Monitor(s) shall wear the appropriate safety equipment while on the construction site.

g. The Tribal Monitor and the project proponent or construction manager shall determine a mutual end or reduction to the on-site monitoring if/when construction activities have a low potential for impacting Tribal Cultural Resources.

h. In the event the Tribal Monitor does not report to the job site at the scheduled time after receiving 24-hour business day notice, construction activities may proceed without tribal monitoring. At no time, regardless of the presence or absence of a Tribal Monitor, shall suspected TCRs be mishandled or disrespected.

i. The CEQA lead shall assist with resolution of disagreements between the project proponent/contractor and the Tribe if such occurs on the project.

PUBLIC WORKS

C54. Construct standard public improvements as noted in these conditions pursuant to Title 17 of the City Code. Improvements shall be designed to City Standards and assured as set forth in Section 17.502.130 of the City Code. All improvements shall be designed and constructed to the satisfaction of the Department of Public Works. Any public improvement not specifically noted in these conditions shall be designed and constructed to City Standards. This shall include the repair or replacement/reconstruction of any existing deteriorated curb, gutter and sidewalk adjacent to the subject property per City standards to the satisfaction of the Department of Public Works.

C55. All right-of-way and street improvement transitions that result from changing the right-of-way of any street shall be located, designed and constructed to the satisfaction of the Department of Public Works. The center lines of such streets shall be aligned.

C56. The applicant shall merge the existing parcels that cover the project site which creates the parcel boundary shown on the proposed site plan prior to obtaining any Building Permits.

C57. All new and existing driveways shall be designed and constructed to City Standards to the satisfaction of the Department of Public Works.

C58. Reciprocal access easements are required for shared use of the driveways w/ the adjacent parcel, if not already in place.

C59. Bulb outs/curb extensions are required where there is on-street parking in the central City area or as directed by the Department of Public Works. Locations of bulb outs must be reviewed and approved by the City Traffic Engineer. The applicant shall construct bulb-outs/ curb extension at the following locations to the satisfaction of Public Works:

a. NW corner of Alhambra Blvd. and D Street (both directions)

b. SW corner of Alhambra Blvd. and C Street (both directions)

c. SE corner of 30th Street and C Street (N/S direction)

C60. The following conditions shall be applied to the proposed gate to the parking garage:

a. The gate shall be designed so that no portion of the gate will intrude into the public right-of-way;

b. The gate can be automatically opened and that all vehicles in the subject property will be equipped with an automatic gate opener/remote control; and

c. The gate shall remain open during operating hours of business if the proposed parking garage is used for public use. (Condition 7c not applicable if garage is used only for private resident use.)

C61. The applicant shall construct high visibility crosswalks with appropriate signage at the Alhambra Boulevard/D Street intersection, crossing Alhambra Boulevard, consistent with City Pedestrian Crossing Guidelines to the satisfaction of the Department of Public Works.

C62. The site plan shall conform to the Americans with Disabilities Act (ADA). requirements in all respects. This shall include the replacement of any curb ramp that does not meet current ADA standards.

C63. The applicant shall record the Final Map, which creates the lot pattern shown on the proposed site plan prior to obtaining any Building Permits.

C64. This project will require the installation of streetlights on all public streets fronting this property to the satisfaction of Public Works. The number and locations of these lights will be determined when development plans are submitted for review.

C65. The site plan shall conform to the parking requirements set forth in City Code 17.608.040.

C66. The applicant shall install appropriate signage and striping to restrict parking between the proposed driveway and the existing fire hydrant along 30th Street per City standards to the satisfaction of the Department of Public Works.

C67. The applicant shall provide a signing and striping improvement plan if new signage or striping is proposed; or if existing signing and/or striping is removed or relocated. The plans shall be to the satisfaction of the Department of Public Works.

C68. The applicant shall obtain any required encroachment permits from Development Engineering for any proposed construction within the public right-of-way (i.e. bicycle racks) per City Standards to the satisfaction of the Department of Public Works.

C69. The applicant shall complete the abandonment/vacation process for the former Chinatown Alley per Section B of the Abandonment/Vacation Application Process & Requirements prior to issuance of any Building Permits to the satisfaction of the Department of Public Works. Any conditions associated with the abandonment clearance letters shall be satisfied as part of the abandonment to the satisfaction of the Department of Public Works.

C70. The design of walls fences and signage near intersections and driveways shall allow stopping sight distance per Caltrans standards and comply with City Code Section 12.28.010 (25-foot sight triangle). Walls shall be set back three feet behind the sight line needed for stopping sight distance to allow sufficient room for pilasters. Landscaping in the area required for adequate stopping sight distance shall be limited to 3.5 feet in height at maturity. The area of exclusion shall be determined by the Department of Public Works.

STREETLIGHTS

C71. This project will require the installation of streetlights on all public streets to the satisfaction of Public Works. This will require the electrical design plans to be prepared and stamped by a registered civil or electrical engineer submitted with the major encroachment permit application. The Developer will determine the quantity and locations of streetlights based upon the City Lighting Standards. In general, the City Lighting Standard for illumination is the following: the illumination levels are 0.10 foot candles minimum for residential applications. The illumination levels for crosswalks and signalized intersections shall meet the American National Standard Institute (ANSI)/Illuminating Engineering Society (IES) RP-8 guidelines. A photometric analysis is required for the first Cycle submission. Residential lighting shall be the City Standard ornamental streetlights

SMUD

C72. SMUD has existing overhead 21kV and low voltage/secondary facilities along the east and west sides of the property that will need to remain. SMUD also has existing overhead 21kV and low voltage/secondary facilities within the property area along Chinatown Alley that will need to

remain (pending the service requirements for the facilites served off of these overhead lines). The Applicant shall be responsible for maintaining all Cal-OSHA and State of California Public Utilities Commission General Order No. 95 safety clearances during construction and upon building completion. If the required clearances cannot be maintained, the Applicant shall be responsible for the cost of relocation.

C73. Any necessary future SMUD facilities located on the Applicant's property shall require a dedicated SMUD easement. This will be determined prior to SMUD performing work on the Applicant's property.

C74. In the event the Applicant requires the relocation or removal of existing SMUD facilities on or adjacent to the subject property, the Applicant shall coordinate with SMUD. The Applicant shall be responsible for the cost of relocation or removal.

C75. SMUD reserves the right to use any portion of its easements on or adjacent to the subject property that it reasonably needs and shall not be responsible for any damages to the developed property within said easement that unreasonably interferes with those needs.

C76. The Applicant shall not place any building foundations within five feet of any SMUD trench to maintain adequate trench integrity. The Applicant shall verify specific clearance requirements for other utilities (e.g., Gas, Telephone, etc.).

C77. In the event the City requires an Irrevocable Offer of Dedication (IOD) for future roadway improvements, the Applicant shall dedicate a 12.5-foot public utility easement (PUE) for overhead and/or underground facilities and appurtenances adjacent to the City's IOD.

C78. The Applicant shall comply with SMUD siting requirements (e.g., panel size/location, clearances from SMUD equipment, transformer location, service conductors). Information regarding SMUD siting requirements can be found at: https://www.smud.org/en/Business-Solutions-and-Rebates/Design-and-Construction-Services.

C79. The Applicant shall locate, verify, and provide a drawing to SMUD identifying all electrical utility infrastructure for the existing structures. If necessary, any existing onsite electrical infrastructure that serves existing structures shall be relocated to the satisfaction of SMUD.

C80. The Applicant shall dedicate a 12.5-foot public utility easement for overhead and/or underground facilities and appurtenances adjacent to all public street rights-of-ways.

C81. The shown transformer location and space on the plans will have to be validated by SMUD to ensure it meets all SMUD design and operational requirements. SMUD space requirements will be dictated by the requested service size. Additional space for a switch may also be required. The latest revised site plan (REV1) shows an interior transformer space. Please consult SMUD Electric Service Requirements (ESR) T013 for additional transformer space requirements. Please contact SMUD Line Design for additional information.

DEPARTMENT OF UTILITIES (DOU)

C82. Per City Code Section, 13.04.070, multiple water service to a single lot or parcel may be allowed if approved by DOU Development Review and Operations and Maintenance staff. Any new water services (other than fire) shall be metered. Excess services shall be abandoned to the satisfaction of the DOU.

C83. Prior to or concurrent with the submittal of improvement plans, prepare a project specific water study for review and approval by the DOU. The water system shall be designed to satisfy the more critical of the two following conditions: (1) at maximum day peak hour demand, the operating or "residual" pressure at all water service connections shall be at least 30 pounds per square inch, (2) at average maximum day demand plus fire flow, the operating or "residual" pressure in the area of the fire shall not be less than 20 pounds per square inch. The water study shall determine if the existing and proposed water distribution system is adequate to supply fire flow demands for the project. A water supply test may be required for this project. The applicant is advised to contact the City of Sacramento Utilities Department Development Review Section (916-808-7890) at the early planning stages to address any water related requirements. Failure to submit the water study may delay review and approval.

C84. Common area landscaping shall have a separate street tap for a metered irrigation service.

C85. Applicant shall abandon the existing City water main in the Alley from 30th Street to Alhambra Boulevard to the satisfaction of the DOU.

C86. Applicant shall construct a City water main on D Street connecting to the existing water distribution main on 30th Street to the existing water distribution main on Alhambra Boulevard to the satisfaction of the DOU.

C87. Applicant shall relocate the existing water service of 3001 D St (APN 003-0112-015-0000) from the Alley to the existing City water main on 30th Street.

C88. This project is served by the Combined Sewer System (CSS). Therefore, the developer/property owner will be required to pay the Combined Sewer System Development Fee prior to the issuance of building permit. The fee will be used for improvements to the CSS. The applicant is recommended to contact the Department of Utilities Development Services at 916-808-7890 for a CSS fee estimate.

C89. All increases in sewer flow shall be mitigated. The proposed project is contributing increased sewer flows to the CSS and shall evaluate the available capacity of existing CSS mains from the project's point of service to the nearest 18-inch main. If any portion of the City mains to the nearest 18-inch main is determined to have insufficient capacity to accommodate the increased sewer flow, the development shall be required to improve the undersized mains to the nearest 18-inch main. The applicant is advised to contact the City of Sacramento Utilities Department Sewer Planning Section (916-808-7890) at the early planning stages to address any sewer related requirements.

C90. Applicant shall relocate the existing sewer service of 3001 D St (APN 003-0112-015-0000) from the Alley to the existing City combined sewer main on 30th Street.

C91. The applicant shall pay the Drainage Impact Fee or provide onsite drainage mitigation meeting the current Onsite Design Manual requirements. To meet the onsite detention requirement, 7,600 cubic feet of detention must be provided per each additional acre of impervious area. The maximum discharge rate must be limited to 0.18 cfs/acre The required detention volume can be partially or fully mitigated by implementing Low Impact Development (LID) features such as Stormwater planters and porous pavement, provided these features conform to the DOU's Hydromodification Management Plan (HMP) requirements. Designer shall utilize the latest edition of the Sacramento Area Hydrology Model (SAHM) when using LID features. The applicant is advised to contact the City of Sacramento Utilities Department

Development Review Section (916-808-7890) at the early planning stages to address any onsite drainage related requirements. Failure to submit the drainage study may delay review and approval. (Note: A maintenance agreement may be required for detention and Low Impact Development (LID) features.)

C92. The onsite water, sewer and storm drain systems shall be private systems maintained by the association or other approved entity.

C93. Onsite sewer and drainage facilities shall be separated systems.

C94. All on-site drainage systems shall be designed to the standards specified in the DOU onsite design manual.

C95. Finished floor elevations shall be a minimum of 6-inches above the 100-year HGL or 1-foot above the overland flow release elevation, whichever is higher or as approved by the DOU.

C96. All lots shall be graded so that drainage does not cross property lines or private drainage easements shall be dedicated.

C97. No more than 6,000 square feet is allowed to sheet drain over a public sidewalk. If the area is larger than 6,000 square feet, then an on-site surface drainage system is required and shall be connected to the street drainage system by means of a storm drain service tap. All on-site systems shall be designed to the standard specified in the DOU onsite manual.

C98. A grading plan showing existing and proposed elevations is required. Adjacent off-site topography shall also be shown to the extent necessary to determine impacts to existing surface drainage paths. No grading shall occur until the grading plan has been reviewed and approved by the DOU.

C99. The applicant must comply with the City of Sacramento's Grading, Erosion and Sediment Control Ordinance. This ordinance requires the applicant to show erosion and sediment control methods on the construction drawings. These plans shall also show the methods to control urban runoff pollution from the project site during construction.

POLICE

<u>Lighting:</u>

C100. Exterior lighting shall be white light using LED lamps with full cutoff fixtures to limit glare and light trespass. Color temperature shall be between 2700K and 4100K with a color rendering index of 80 or higher and a light loss factor of 0.95 or better. When choosing lamps, the applicant shall look for efficiency of 110 lumens per watt or better. All existing exterior fixtures shall be replaced with fixtures that meet this requirement.

C101. Light poles, if applicable, shall be no higher than 16 feet.

C102. Broken or damaged exterior lighting shall be repaired or replaced within 48 hours of being noted.

C103. Entry drives, drive aisles, parking and bicycle parking shall be illuminated to a maintained minimum of 1.5 foot candles per square foot of parking area at a 6:1 average to minimum ratio.

C104. Exterior walkways, alcoves and passageways shall be illuminated to a maintained minimum of 1/3 foot candles per square foot of surface area at a 6:1 average to minimum ratio.

C105. Exterior lighting shall be designed in coordination with the landscaping plan to minimize interference between the light standards and required illumination and the landscape trees and required shading.

C106. Exterior lighting shall be shielded or otherwise designed to avoid spill-over illumination to adjacent streets and properties.

Landscaping

C107. All mature landscaping shall follow the two-foot, six-foot rule. All landscaping shall be ground cover, two feet or less and lower tree canopies of mature trees shall be above six feet. This increases natural surveillance, eliminates hiding areas within the landscape, and provides for tenants and users a safer environment.

C108. Tree canopies shall not interfere with or block lighting. This creates shadows and areas of concealment. The landscaping plan shall allow for proper illumination and visibility regarding lighting and surveillance cameras through the maturity of trees and shrubs.

Security

C109. Fencing, if applicable, shall be of decorative tubular steel, no climb type and a minimum of six feet in height.

C110. A Video Assessment and Surveillance System (VASS) shall be installed at the site and maintained by a property management company, security company, or designee.

C111. Manager with access to VASS storage shall be able to respond to any activation within two hours.

C112. Cameras shall be day/night capable with a resolution of no less than two (2) megapixels and a minimum frame rate of 15 frames per second.

C113. Each driveway entrance and each building entrance shall be covered by a camera set at 100 pixels per foot or higher.

C114. VASS shall be capable of exporting footage to common media in a standard viewing format and shall not require proprietary software for third party viewing.

C115. VASS shall be capable of storing no less than 30 days' worth of activity.

C116. VASS shall provide comprehensive coverage of:

a. areas of ingress and egress

b. parking lot(s)

c. coverage of all four (4) exterior sides of the property

d. adjacent public rights of way

e. main lobby entrance

f. hallways

g. elevators

h. common retail areas

C117. No more than 10% of the square footage of windows and clear doors for retail purposes shall be blocked by advertising, signs, shelves or anything else. All advertising, signs, and shelving shall be placed and maintained in a manner that ensures that law enforcement personnel have a clear and unobstructed view of the interior of the premises from the exterior public

sidewalk or entrance to the premises. All signs shall comply with the City Code.

C118. All dumpsters shall be kept locked or in locked enclosures. Gating for dumpster enclosures should be slatted to allow visual surveillance of the interior.

C119. Exterior trash receptacles shall be of a design to prevent unauthorized removal of articles from the trash bin.

C120. Any graffiti painted or marked upon the premises or on any adjacent area under the control of the applicant shall be removed or painted over with matching paint within 72 hours of being applied.

C121. Exterior benches shall be constructed so as to deter skateboarding (e.g., center armrest partitions).

C122. Property management shall be responsible for the daily removal of all litter from the site.

C123. Applicant shall install a law enforcement “Knox Box” for police access to common areas on the premises, including, but not limited to the main lobby entrance. If elevators can only be operated via electronic access card, management shall ensure a card/fob is placed in the exterior knox box.

C124. Applicant shall employ uniformed security to respond to on-site disturbances, 24/7. Security shall conduct no less than one (1) site inspection daily. The contracted security company shall be registered and in good standing with the Bureau of Security and Investigative Services (BSIS). Applicant may request a modification of this condition at any time. Any request for modification shall be in writing and submitted to the Sergeant of the Sacramento Police Department’s (Crime Prevention Through Environmental Design (CPTED) unit, or designee, and specify the desired modification(s). The Sacramento Police Department will evaluate the modification request and will respond within 30 days of receipt of the request.

<u>During Construction:</u>

C125. The applicant shall enclose the entire perimeter of the project with a chain link fence with necessary constriction gates to be locked after normal construction hours.

C126. The location shall be monitored by security after normal construction hours during all phases of construction. This can be done via remote camera monitoring.

C127. Adequate security lighting shall be provided to illuminate vulnerable equipment and materials. Lighting shall be white light with full cut off fixtures.

SACSEWER

C128. Prior to the issuance of a building permit:

a. The owner must contact Permit Services Unit at PermitServices@sacsewer.com or by phone at (916) 876-6100 to determine if SacSewer impact fees are due. Fees are to be paid prior to the issuance of building permits.

SOLID WASTE

C129. Project must meet the requirements outlined in City Code Chapter 13.10, 13.24, and 17.616.

C130. The trash rooms must have sufficient space to store bins for trash, recycling, and organics. Containers may be used with an increase in collection frequency as an alternative to bins. The resident trash rooms on each floor shall have containers or chutes for trash, recycling, and organics. Service level minimums for recycling and organics can be found in Ch. 13.24

C131. Applicant must provide a statement of how trash, recycling and organics will be organized and collected after project is complete, per City Code Chapter 17.616.020. This statement must explain how the property manager will collect from the trash, recycling and organics receptacles located around the site and place each material type in the appropriate bin in the trash enclosure.

C132. Solid waste trucks must be able to safely move about the project, with minimum backing, and able to empty the bins and cans safely.

- This project may be required to submit a Construction and Demolition (C&D) Debris plan, as outlined on the City's web site at https://www.cityofsacramento.gov/public-works/recycling-solid-

waste/Commercialwasteservices/construction---demolition-recycling. Please contact the Solid Waste C&D team if you have any questions: Phone: (916) 808-0965 & Email: C&D@cityofsacramento.org

PARKS

C133. Maintenance District: The applicant shall initiate and complete the formation of a parks maintenance district (assessment or Mello-Roos special tax district) or annex the project into an existing parks maintenance district. The applicant shall pay all city fees for formation of or annexation to a parks maintenance district. (Contact Infrastructure Finance, Brent Mueller, (916)808-5715, bmueller@cityofsacramento.org).

URBAN FORESTRY

C134. General Tree Protection – The applicant shall include the following Tree Preservation Measures in the General Notes, Grading Plans, Utility Plans, Demolition Plan, Landscape Plan and the offsite plans if the trees will be impacted by work proposed on each sheet.

Required Tree Preservation Measures for City and Private Protected Trees

1. *This project shall contract with a project arborist experienced with tree protection and construction that is required to:*
    a. *Attend the preconstruction meetings to approve of and inform contractors of all tree protection measures.*
    b. *Visit the site before and after demolition, grading and landscaping as well as at least twice each month during construction to ensure that tree protection measures are implemented and maintained.*
    c. *Be responsible for correcting any site conditions that may negatively impact the trees and revisit the site to ensure that corrective action was properly implemented.*
    d. *The project arborist shall report in writing to Urban Forestry all violations and tree protection failures along with corrective action taken and expected outcomes.*
2. *All concrete sidewalks and driveways shall be retained throughout construction to protect the roots and soil from the impacts of construction activities.*
    a. *Existing driveways shall be used as the sole access to the site. Where there are no existing driveways, access shall be limited to a one or two locations outside the dripline of protected trees that have protection from soil compaction with the use of one or more of the following: A 6-inch layer of hardwood chips covered by ¾-inch plywood or trench plates, geotextile fabric covered by a 6-inch layer of hardwood chips or an alternative that is approved by the City Arborist.*

3. *Right-of-way planters and City trees shall be separated from the construction site with a six- foot high chain link fence that shall remain throughout the duration of the project to protect trees and to prevent construction traffic from compacting the soil in the planters.*
4. *Construction trailers and port-a-potties shall be placed on existing hardscape or bridged over the tree protection zone or planter so as not to compact soil.*
5. *Any Regulated Work within the dripline or Tree Protection Zone of a protected tree shall be separately permitted prior to the start of construction and supervised by a Qualified Arborist. Submit a tree permit application and a tree protection plan created by a Qualified Arborist to UrbanForestry@cityofsacramento.org and refer to the planning project number or off-site project number.*
6. *All excavation, grading or trenching within the dripline of a protected tree for the purpose of utility installation, constructing foundations, footings, sidewalks, curbs, gutters, or any other reason shall employ one of the following methods: Hydro-excavation, pneumatic excavation or hand digging and shall be directly supervised by a qualified arborist.*
7. *There shall be no excavation deeper than the existing excavation for sidewalks within the dripline of protected trees.*
8. *There shall be no grade changes within the dripline of protected trees. All grade changes shall be accommodated onsite.*
9. *There shall be no soil compaction within the dripline of protected trees.*
10. *There shall be no non-native soil, non-organic matter or structural soil added to the right-of-way planter.*
11. *The following is a list of activities that require a tree permit if they are to occur or be used within the right-of-way planter and/or within the tree protection zone of protected trees: any regulated work as defined in SCC 12.56, excavation, grade changes, trenches, root or canopy pruning or boring.*
12. *The following is a list of activities that are prohibited within the right-of-way planter and/or tree protection zone of protected trees: pedestrian and equipment traffic that could compact the soil or physically damage roots, parking vehicles, equipment and/or port-a-potties, storing of soil, construction materials, petroleum products, water or building refuse, disposing of wash water, paint, cement, fuel or other potentially damaging liquids and any other activities that may have negative impacts on the trees and soil.*
13. *All trees shall be watered regularly according to the recommendation of the project arborist.*
14. *The applicant shall be financially responsible for any damage to the city trees associated with the project. Accidental or negligent actions that damage city trees may result in a penalty. The monetary value of any such damages will be appraised by the City Urban Forester or his authorized representative and shall be expressed as the monetary equivalent of all labor and materials required to bring the tree in question to a state of comparable utility with regards to its condition and function prior to the beginning of the project.*

ADVISORY NOTES:

ADV.C1. **Parks.** As per City Code, the applicant will be responsible to meet his/her obligations regarding**:**

a. Title 18, 18.56 Park Development Impact Fee, due at the time of issuance of building permit. The Park Development Impact Fee is estimated at $789,994. This project proposes a total of 332 multifamily units, with 264 units under 750 square feet, no units over 2000 square feet, and the remaining units totaling 162,790 square feet, with 2,400 square feet of Commercial Retail/services development. The Park Development Impact Fee due for this project is based on the Central City Incentive Zone Rate of $2.20 per square foot for residential projects, with a minimum rate of $1,634 for units under 750 square feet and a maximum of $4,360 for units over 2,000 square feet, and a rate of $0.20 per square foot for retail and commercial services projects. The applicant would likely receive credit for the demolition of the existing structures. Any change in these factors will change the amount of the PIF due. The fee is calculated using factors at the time that the project is submitted for building permit.

b. Community Facilities District 2002-02, Neighborhood Park Maintenance CFD Annexation

ADV.C2. **Police.** City of Sacramento permits must be obtained for private patrol, alarms, and camera systems.

ADV.C3. **DOU.** Water meters shall be located at the point of service, which is back of curb for separated sidewalks, back of walk for connected sidewalks or at the inside edge of the right-of-way for public alleys.

ADV.C4. **DOU.** As of January 1, 2018, all new multi-family residential construction will require sub-metering of each residential unit pursuant to all requirements found in California Senate Bill 7 (SB7). These requirements at a minimum include installing sub meters, billing for water based on the sub meters, and long-term calibration and maintenance of the sub meter. The SB7 requirements are the responsibility of the property owner.

ADV.C5. **DOU.** The proposed project is located in a Zone X on the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Maps

(FIRMs). Accordingly, the project site lies in an area with no requirements to elevate or flood proof.

ADV.C6. **DOU.** On October 24, 2023, and November 14, 2023, City Council adopted Resolutions 2023-0338 and 2023-0368, respectively, to adjust the Water System, Sewer, and Combined Sewer Development Fees, as well as, establish the Storm Drainage Development Fee to align with updated Nexus Studies. These resolutions provide for an effective date for the new Utility Development Fees as of January 22, 2024.

ADV.C7. **Fire.** Provide a water flow test. (Make arrangements with the Department of Utilities at 916-808-7890 or by email at DOUdevelopmentreview@cityofsacramento.org, California Fire Code Section 507.4

ADV.C8. **Fire.** Provide appropriate Knox access for site. California Fire Code Section 506.

ADV.C9. **Fire.** Provide standpipe hose valves at the intermediate landing levels of stairways as required by the Sacramento Fire Official.

ADV.C10. **Fire.** Emergency Responder Radio Coverage may be required. Testing shall be conducted by an authorized technician to verify compliance with section 510, California Fire Code. This test shall verify that the building will support the Sacramento City Fire Department Radio Communication System. This test shall be performed in accordance with California Fire Code section 510.4.1.

ADV.C11. **Fire.** Provide a Site Safety Plan in compliance with Section 3303 of the California Fire Code. The plan shall identify at minimum, the following safety precautions during demolition and construction:

a. Name and contact information of the Owner's authorized agent (Site Safety Director) responsible for the development, implementation and maintenance of an approved written site safety plan.
b. Procedures for reporting emergencies.
c. Fire Department Access Routes.
d. Location of fire protection equipment, including type and size of fire extinguishers.

e. Smoking and cooking policies that include designated safe areas where smoking and cooking may occur with adequate signage in accordance with Section 3305.8
f. Location(s) and proper safety considerations for temporary heating and any associated equipment.
g. Hot Work Plan when any welding and/or cutting shall occur.
h. Means of providing safeguards to minimize the risk of unwanted releases, fires or explosions involving hazardous materials, such as ignitable liquids/vapors or other combustible materials and ignition sources (cutting and welding, etc).
i. Designated smoking areas free of ignitable vapors and other combustible materials

ADV.C12. **Building.** The plans are required to comply with the California Building Standards Code (California Code of Regulations Title 24 Volumes 1-12).

ADV.C13. **Building.** Some of the structures will be classified as R-2 occupancies, provide the following at the time these plans are submitted to the building department for permit issuance**:**

a. Please determine if the ownership, operation, program participation, or funding of this project, either in whole or in part, falls within the definition of "Public Housing" and/or "Public Use" as defined in CBC Section 202.

i. If public housing or public use:
- Indicate on the plans that the code standard for accessible access is CBC Chapter 11B.
- Specify the locations of all accessible unit entries on the plans and provide detailing for an accessible route of travel as required by CBC Sections 11B-233 and 11B-206.
- Include necessary details to demonstrate compliance with all applicable requirements of CBC Section 11B-233.

ii. If not public housing or public use:
- Include language on the plans under the project information section stating, “Due to the ownership, operation, and nature of funding, this project is not considered public housing, and CBC Chapter 11A is the applicable standard for housing accessibility

ADV.C14. **Sacramento Metro Air District.** Due to the health risks posed by public exposure to asbestos, demolition and renovation of existing buildings is subject to Sac Metro Air District Rule 902, to limit asbestos exposure during these activities. Sac Metro Air District staff is available to review notifications and answer asbestos related questions, either by emailing asbestos@airquality.org, or calling 279-207-1122.

ADV.C15. **Sacramento Metro Air District.** All projects are subject to Sac Metro Air District rules and regulations in effect at the time of construction. Please visit our website to find a list of the most common rules that apply at the construction phase of projects. Implementing Sac Metro Air District Basic Construction Emission Control Practices, also available on our website, will facilitate compliance with Sac Metro Air District's Rule 403, Fugitive Dust.

D. The **Tree Permit** for the removal of seven City trees (Tree #59878, Tree #59879, Tree #59888, Tree #59890, Tree #59896, Tree #59897, Tree #59903) and two private protected trees (Tree #8591 and Tree #8594, and for the non-standard pruning of two City trees (Tree #59887 and Tree #59902) as identified in the arborist report in Exhibit B is **approved** subject to the following conditions:

D1. The applicant shall provide for the planting and irrigation of 10 inches diameter at standard height (DSH) in the form of street trees according to the landscape plan and to the satisfaction of the City Urban Forester.

D2. The applicant shall provide for the planting and irrigation of 34 inches DSH in the form of landscape trees on site according to the landscape plan and to the satisfaction of the City Urban Forester.

D3. The applicant shall satisfy the remaining 79 inches of replacement requirement for City trees with the payment of in-lieu fees in the amount of $325/inch of diameter removed, totaling $25,675.00 to be deposited to the Tree Planting and Replacement Fund.

D4. All pruning of City trees shall be directly supervised by an International Society of Arboriculture (ISA) Certified Arborist.

D5. The project arborist and the contracted pruner shall meet onsite with the City Arborist prior to pruning to discuss pruning specifications. The tree permit will be issued at that time.

D6. The applicant shall retain all trees permitted for removal until all fees associated with a building permit have been paid.

Section 4. Exhibits A and B are part of this resolution.

Table of Contents:

Exhibit A – Project Plans
Exhibit B **–** Arborist Report

PERSPECTIVE FROM ALHAMBRA BLVD

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AERIAL PERSPECTIVE

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PERSPECTIVE FROM THE FREEWAY

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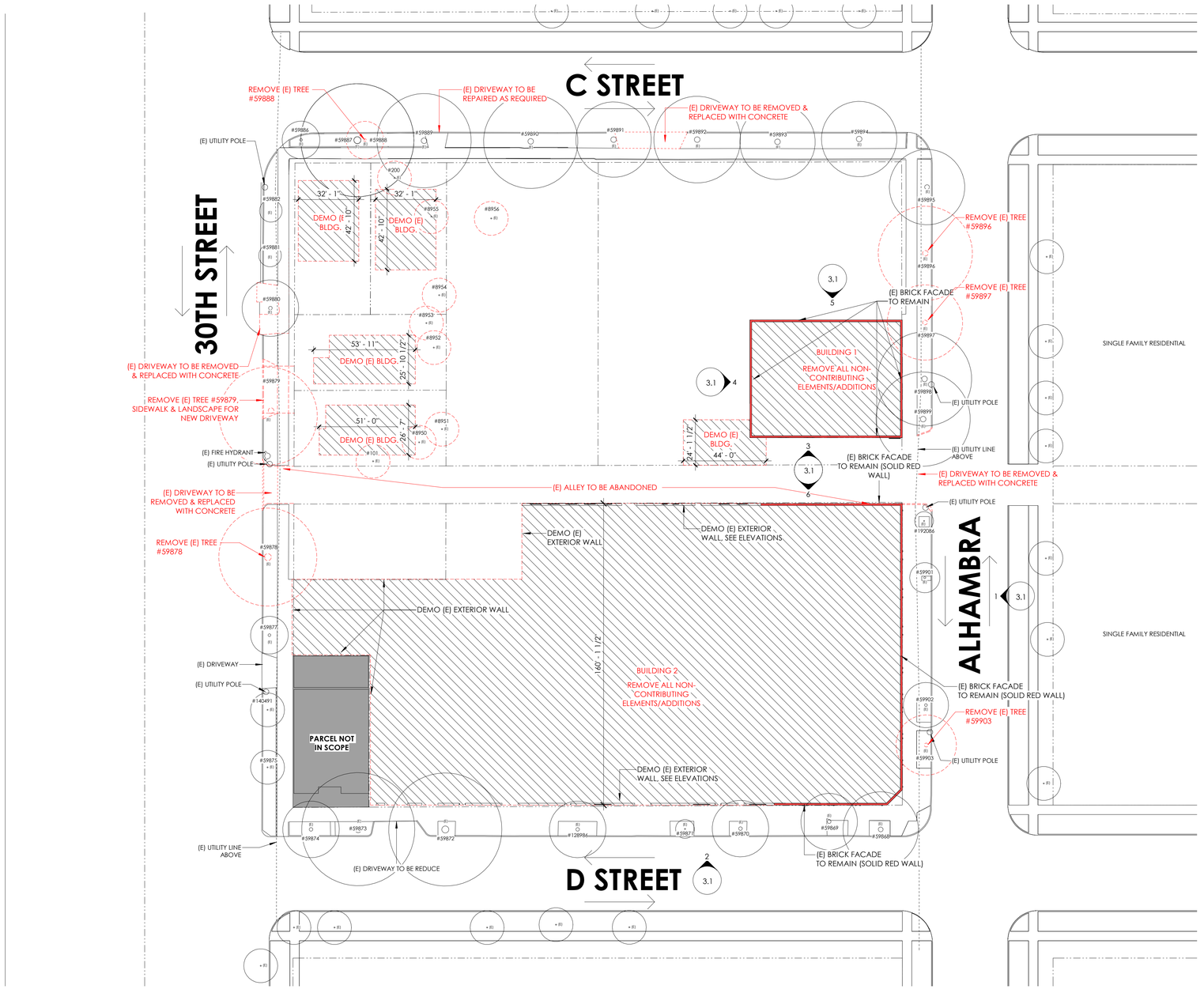

SITE PLAN - EXISTING & DEMO 1" = 30'-0" 1

REQUIRED TREE PRESERVATION MEASURES FOR CITY AND PRIVATE PROTECTED TREES

1. THIS PROJECT SHALL CONTRACT WITH A PROJECT ARBORIST EXPERIENCED WITH TREE PROTECTION AND CONSTRUCTION THAT IS REQUIRED TO:

A. ATTEND THE PRECONSTRUCTION MEETINGS TO APPROVE OF AND INFORM CONTRACTORS OF ALL TREE PROTECTION MEASURES.

B. VISIT THE SITE BEFORE AND AFTER DEMOLITION, GRADING AND LANDSCAPING AS WELL AS AT LEAST TWICE EACH MONTH DURING CONSTRUCTION TO ENSURE THAT TREE PROTECTION MEASURES ARE IMPLEMENTED AND MAINTAINED.

C. BE RESPONSIBLE FOR CORRECTING ANY SITE CONDITIONS THAT MAY NEGATIVELY IMPACT THE TREES AND REVISIT THE SITE TO ENSURE CORRECTIVE ACTION WAS PROPERLY IMPLEMENTED.

D. THE PROJECT ARBORIST SHALL REPORT IN WRITING TO URBAN FORESTRY ALL VIOLATIONS AND TREE PROTECTION FAILURES ALONG WITH CORRECTIVE ACTION TAKEN AND EXPECTED OUTCOMES.

2. ALL CONCRETE SIDEWALKS AND DRIVEWAYS SHALL BE RETAINED THROUGHOUT CONSTRUCTION TO PROTECT THE ROOTS AND SOIL FROM THE IMPACTS OF CONSTRUCTION ACTIVITIES.

A. EXISTING DRIVEWAYS SHALL BE USED AS THE SOLE ACCESS TO THE SITE. WHERE THERE ARE NO EXISTING DRIVEWAYS, ACCESS SHALL BE LIMITED TO A ONE OR TWO LOCATIONS OUTSIDE THE DRIPLINE OF PROTECTED TREES THAT HAVE PROTECTION FROM SOIL COMPACTION WITH THE USE OF ONE OR MORE OF THE FOLLOWING: A 6-INCH LAYER OF HARDWOOD CHIPS COVERED BY ¾-INCH PLYWOOD OR TRENCH PLATES, GEOTEXTILE FABRIC COVERED BY A 6-INCH LAYER OF HARDWOOD CHIPS OR AN ALTERNATIVE THAT IS APPROVED BY THE CITY ARBORIST.

3. RIGHT-OF-WAY PLANTERS AND CITY TREES SHALL BE SEPARATED FROM THE CONSTRUCTION SITE WITH A SIX-FOOT HIGH CHAIN LINK FENCE THAT SHALL REMAIN THROUGHOUT THE DURATION OF THE PROJECT TO PROTECT TREES AND TO PREVENT CONSTRUCTION TRAFFIC FROM COMPACTING THE SOIL IN THE PLANTERS.

4. CONSTRUCTION TRAILERS AND PORT-A-POTTIES SHALL BE PLACED ON EXISTING HARDSCAPE OR BRIDGED OVER THE TREE PROTECTION ZONE OR PLANTER SO AS NOT TO COMPACT SOIL.

5. ANY REGULATED WORK WITHIN THE DRIPLINE OR TREE PROTECTION ZONE OF A REGULATED TREE SHALL BE SEPARATELY PERMITTED PRIOR TO THE START OF CONSTRUCTION AND SUPERVISED BY A CERTIFIED ARBORIST. SUBMIT A TREE PERMIT APPLICATION AND A TREE PROTECTION PLAN CREATED BY A CERTIFIED ARBORIST TO URBANFORESTRY@CITYOFSACRAMENTO.ORG AND REFER TO THE PLANNING PROJECT NUMBER OR OFF-SITE PROJECT NUMBER.

6. ALL EXCAVATION, GRADING, OR TRENCHING WITHIN THE DRIPLINE OF A PROTECTED TREE FOR THE PURPOSE OF UTILITY INSTALLATION, CONSTRUCTING FOUNDATIONS, FOOTINGS, SIDEWALKS, CURBS, GUTTERS, OR ANY OTHER REASON SHALL EMPLOY ONE OF THE FOLLOWING METHODS: HYDRO-EXCAVATION, PNEUMATIC EXCAVATION, OR HAND DIGGING AND SHALL BE DIRECTLY SUPERVISED BY A CERTIFIED ARBORIST.

7. THERE SHALL BE NO EXCAVATION DEEPER THAN THE EXISTING EXCAVATION FOR SIDEWALKS WITHIN THE DRIPLINE OF PROTECTED TREES.

8. THERE SHALL BE NO GRADE CHANGES WITHIN THE DRIPLINE OF PROTECTED TREES. ALL GRADE CHANGES SHALL BE ACCOMMODATED ONSITE.

9. THERE SHALL BE NO SOIL COMPACTION WITHIN THE DRIPLINE OF PROTECTED TREES.

10. THERE SHALL BE NO NON-NATIVE SOIL, NON-ORGANIC MATTER OR STRUCTURAL SOIL ADDED TO THE RIGHT-OF-WAY PLANTER.

11. THE FOLLOWING IS A LIST OF ACTIVITIES THAT REQUIRE A TREE PERMIT IF THEY ARE TO OCCUR OR BE USED WITHIN THE RIGHT-OF-WAY PLANTER AND/OR WITHIN THE TREE PROTECTION ZONE OF PROTECTED TREES: ANY REGULATED WORK AS DEFINED IN SCC 12.56, EXCAVATION, GRADE CHANGES, TRENCHES, ROOT OR CANOPY PRUNING, OR BORING.

12. THE FOLLOWING IS A LIST OF ACTIVITIES THAT ARE PROHIBITED WITHIN THE RIGHT-OF-WAY PLANTER AND/OR TREE PROTECTION ZONE OF PROTECTED TREES: PEDESTRIAN AND EQUIPMENT TRAFFIC THAT COULD COMPACT THE SOIL OR PHYSICALLY DAMAGE ROOTS, PARKING VEHICLES, EQUIPMENT AND/OR PORT-A-POTTIES, STORING OF SOIL, CONSTRUCTION MATERIALS, PETROLEUM PRODUCTS, WATER OR BUILDING REFUSE, DISPOSING OF WASH WATER, PAINT, CEMENT, FUEL OR OTHER POTENTIALLY DAMAGING LIQUIDS, AND ANY OTHER ACTIVITIES THAT MAY HAVE NEGATIVE IMPACTS ON THE TREES AND SOIL.

13. ALL TREES SHALL BE WATERED REGULARLY ACCORDING TO THE RECOMMENDATION OF THE PROJECT ARBORIST.

14. THE APPLICANT SHALL BE FINANCIALLY RESPONSIBLE FOR ANY DAMAGE TO CITY TREES ASSOCIATED WITH THE PROJECT. ACCIDENTAL OR NEGLIGENT ACTIONS THAT DAMAGE CITY TREES MAY RESULT IN A PENALTY. THE MONETARY VALUE OF ANY SUCH DAMAGES WILL BE APPRAISED BY THE CITY URBAN FORESTER OR HIS AUTHORIZED REPRESENTATIVE AND SHALL BE EXPRESSED AS THE MONETARY EQUIVALENT OF ALL LABOR AND MATERIALS REQUIRED TO BRING THE TREE IN QUESTION TO A STATE OF COMPARABLE UTILITY WITH REGARDS TO ITS CONDITION AND FUNCTION PRIOR TO THE BEGINNING OF THE PROJECT.

TREE PRESERVATION MEASURES

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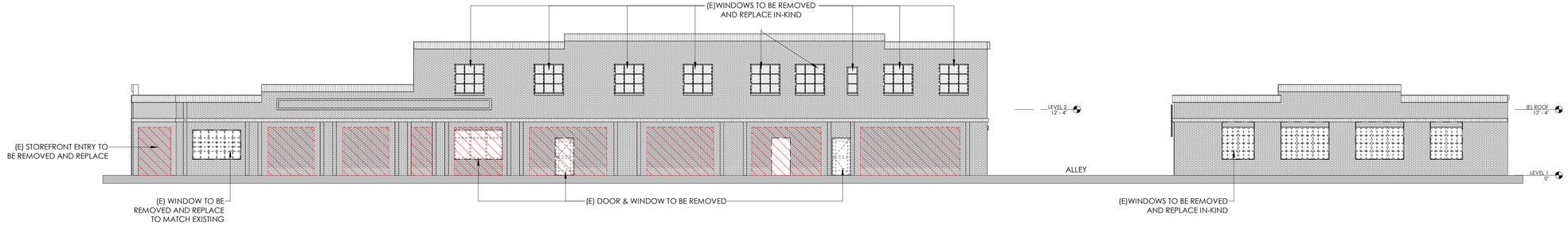

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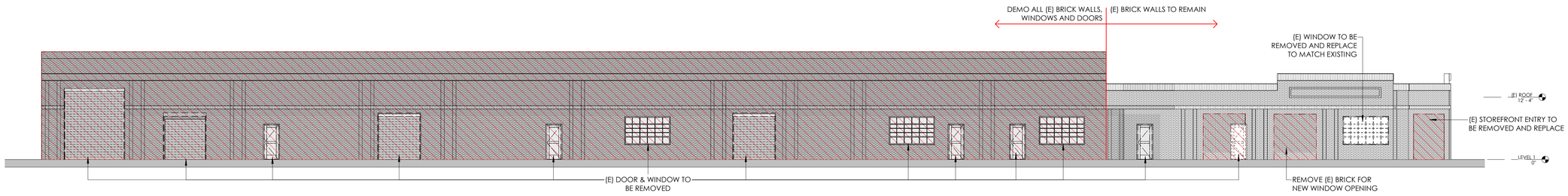

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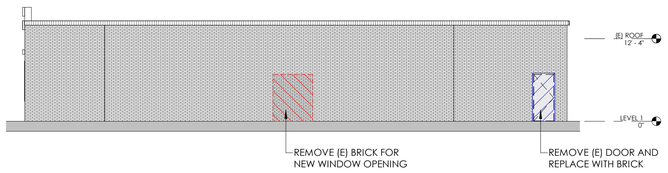
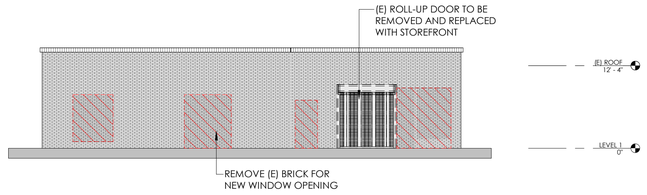


EXISTING/DEMO - NORTH ELEVATION BLDG 1 3/32" = 1'-0" 5



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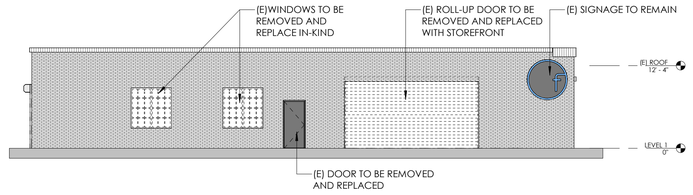

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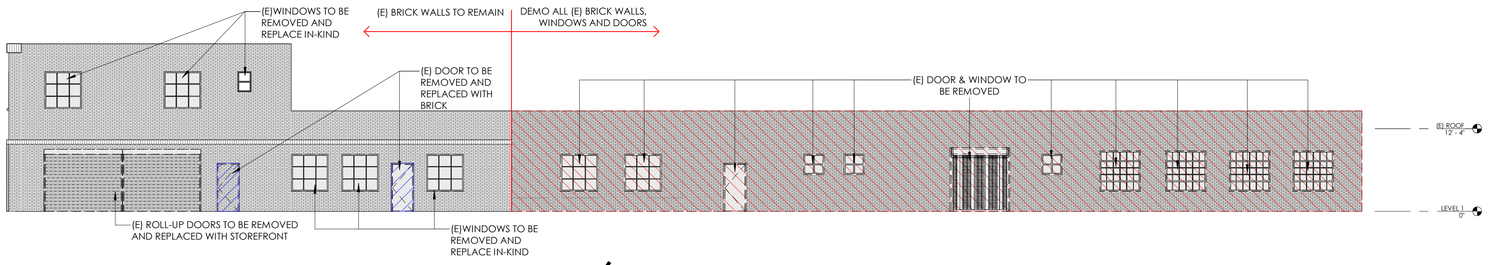

EXISTING/DEMO - NORTH ELEVATION BLDG 2 3/32" = 1'-0" 6

LEGEND

- INFILL BRICK
- TO BE DEMOLISHED

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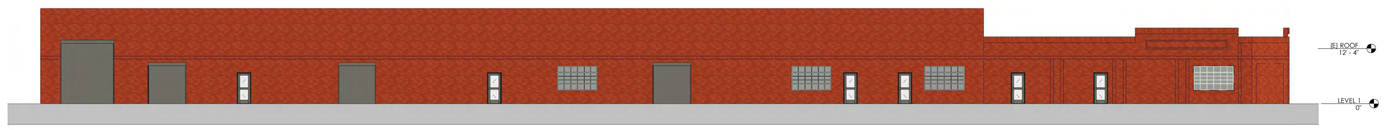
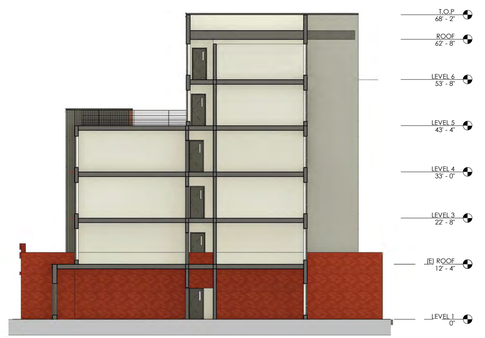
PROPOSED EAST ELEVATION BLDG 1 & 2 1/16" = 1'-0" 8

EXISTING - EAST ELEVATION BLDG 1 & 2 1/16" = 1'-0" 7

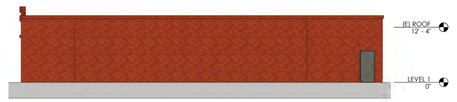
PROPOSED - SOUTH ELEVATION 1/16" = 1'-0" 6



EXISTING - SOUTH ELEVATION BLDG 2 1/16" = 1'-0" 5

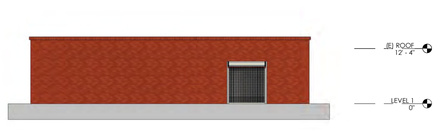


PROPOSED - NORTH ELEVATION BLDG 1 1/16" = 1'-0" 4



EXISTING - NORTH ELEVATION BLDG 1 1/16" = 1'-0" 3

PROPOSED - WEST ELEVATION BLDG 1 1/16" = 1'-0" 2



EXISTING - WEST ELEVATION BLDG 1 1/16" = 1'-0" 1

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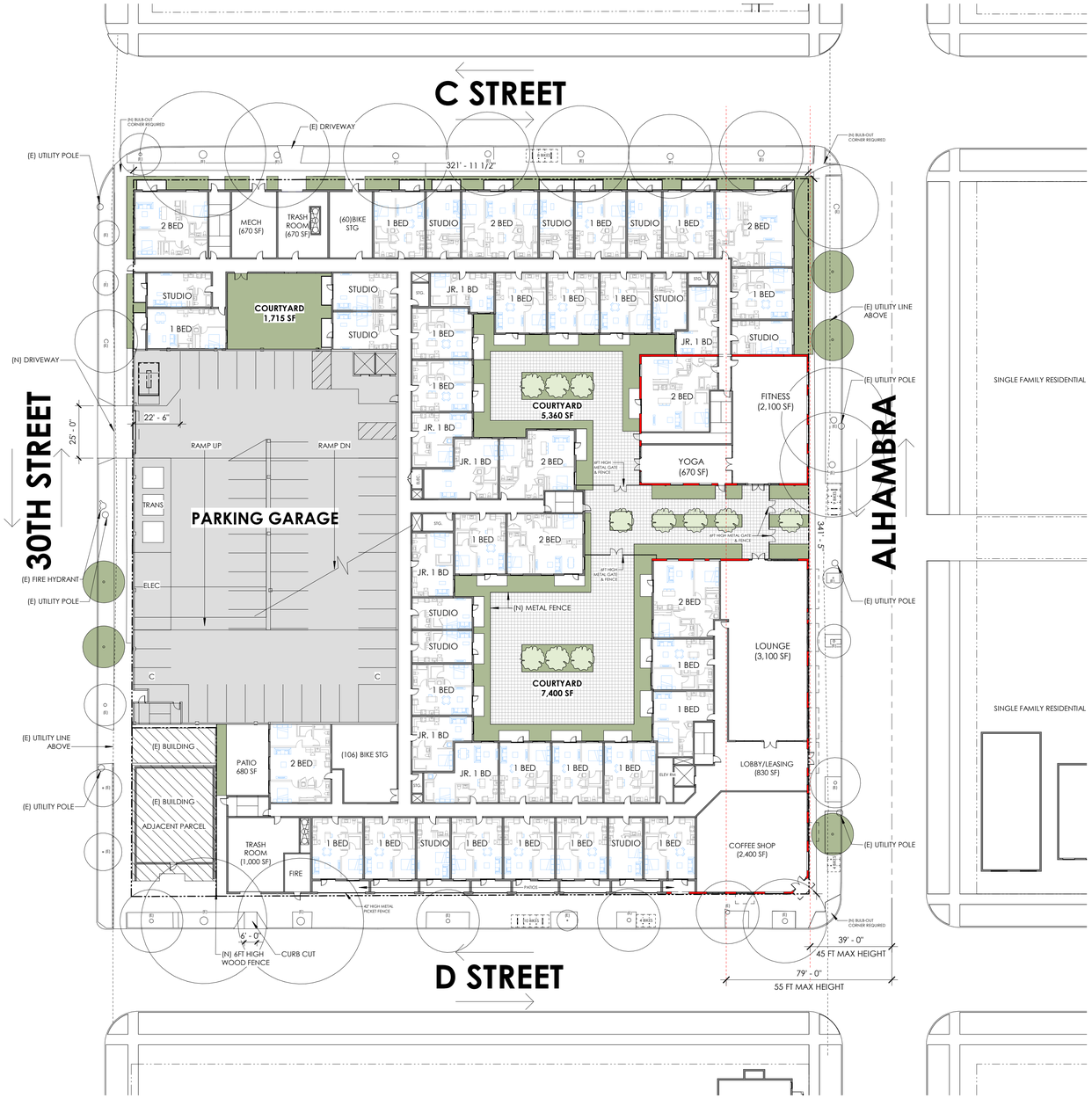
CAPITAL CITY FWY



GRAPHIC SCALE
0 30 60 90 120

SITE PLAN 1" = 30'-0" 1

REQUIRED TREE PRESERVATION MEASURES FOR CITY AND PRIVATE PROTECTED TREES

1. THIS PROJECT SHALL CONTRACT WITH A PROJECT ARBORIST EXPERIENCED WITH TREE PROTECTION AND CONSTRUCTION THAT IS REQUIRED TO:

A. ATTEND THE PRECONSTRUCTION MEETINGS TO APPROVE OF AND INFORM CONTRACTORS OF ALL TREE PROTECTION MEASURES.

B. VISIT THE SITE BEFORE AND AFTER DEMOLITION, GRADING AND LANDSCAPING AS WELL AS AT LEAST TWICE EACH MONTH DURING CONSTRUCTION TO ENSURE THAT TREE PROTECTION MEASURES ARE IMPLEMENTED AND MAINTAINED.

C. BE RESPONSIBLE FOR CORRECTING ANY SITE CONDITIONS THAT MAY NEGATIVELY IMPACT THE TREES AND REVISIT THE SITE TO ENSURE CORRECTIVE ACTION WAS PROPERLY IMPLEMENTED.

D. THE PROJECT ARBORIST SHALL REPORT IN WRITING TO URBAN FORESTRY ALL VIOLATIONS AND TREE PROTECTION FAILURES ALONG WITH CORRECTIVE ACTION TAKEN AND EXPECTED OUTCOMES.

2. ALL CONCRETE SIDEWALKS AND DRIVEWAYS SHALL BE RETAINED THROUGHOUT CONSTRUCTION TO PROTECT THE ROOTS AND SOIL FROM THE IMPACTS OF CONSTRUCTION ACTIVITIES.

A. EXISTING DRIVEWAYS SHALL BE USED AS THE SOLE ACCESS TO THE SITE. WHERE THERE ARE NO EXISTING DRIVEWAYS, ACCESS SHALL BE LIMITED TO A ONE OR TWO LOCATIONS OUTSIDE THE DRIPLINE OF PROTECTED TREES THAT HAVE PROTECTION FROM SOIL COMPACTION WITH THE USE OF ONE OR MORE OF THE FOLLOWING: A 6-INCH LAYER OF HARDWOOD CHIPS COVERED BY ¾-INCH PLYWOOD OR TRENCH PLATES, GEOTEXTILE FABRIC COVERED BY A 6-INCH LAYER OF HARDWOOD CHIPS OR AN ALTERNATIVE THAT IS APPROVED BY THE CITY ARBORIST.

3. RIGHT-OF-WAY PLANTERS AND CITY TREES SHALL BE SEPARATED FROM THE CONSTRUCTION SITE WITH A SIX-FOOT HIGH CHAIN LINK FENCE THAT SHALL REMAIN THROUGHOUT THE DURATION OF THE PROJECT TO PROTECT TREES AND TO PREVENT CONSTRUCTION TRAFFIC FROM COMPACTING THE SOIL IN THE PLANTERS.

4. CONSTRUCTION TRAILERS AND PORT-A-POTTIES SHALL BE PLACED ON EXISTING HARDSCAPE OR BRIDGED OVER THE TREE PROTECTION ZONE OR PLANTER SO AS NOT TO COMPACT SOIL.

5. ANY REGULATED WORK WITHIN THE DRIPLINE OR TREE PROTECTION ZONE OF A REGULATED TREE SHALL BE SEPARATELY PERMITTED PRIOR TO THE START OF CONSTRUCTION AND SUPERVISED BY A CERTIFIED ARBORIST. SUBMIT A TREE PERMIT APPLICATION AND A TREE PROTECTION PLAN CREATED BY A CERTIFIED ARBORIST TO URBANFORESTRY@CITYOFSACRAMENTO.ORG AND REFER TO THE PLANNING PROJECT NUMBER OR OFF-SITE PROJECT NUMBER.

6. ALL EXCAVATION, GRADING, OR TRENCHING WITHIN THE DRIPLINE OF A PROTECTED TREE FOR THE PURPOSE OF UTILITY INSTALLATION, CONSTRUCTING FOUNDATIONS, FOOTINGS, SIDEWALKS, CURBS, GUTTERS, OR ANY OTHER REASON SHALL EMPLOY ONE OF THE FOLLOWING METHODS: HYDRO-EXCAVATION, PNEUMATIC EXCAVATION, OR HAND DIGGING AND SHALL BE DIRECTLY SUPERVISED BY A CERTIFIED ARBORIST.

7. THERE SHALL BE NO EXCAVATION DEEPER THAN THE EXISTING EXCAVATION FOR SIDEWALKS WITHIN THE DRIPLINE OF PROTECTED TREES.

8. THERE SHALL BE NO GRADE CHANGES WITHIN THE DRIPLINE OF PROTECTED TREES. ALL GRADE CHANGES SHALL BE ACCOMMODATED ONSITE.

9. THERE SHALL BE NO SOIL COMPACTION WITHIN THE DRIPLINE OF PROTECTED TREES.

10. THERE SHALL BE NO NON-NATIVE SOIL, NON-ORGANIC MATTER OR STRUCTURAL SOIL ADDED TO THE RIGHT-OF-WAY PLANTER.

11. THE FOLLOWING IS A LIST OF ACTIVITIES THAT REQUIRE A TREE PERMIT IF THEY ARE TO OCCUR OR BE USED WITHIN THE RIGHT-OF-WAY PLANTER AND/OR WITHIN THE TREE PROTECTION ZONE OF PROTECTED TREES: ANY REGULATED WORK AS DEFINED IN SCC 12.56, EXCAVATION, GRADE CHANGES, TRENCHES, ROOT OR CANOPY PRUNING, OR BORING.

12. THE FOLLOWING IS A LIST OF ACTIVITIES THAT ARE PROHIBITED WITHIN THE RIGHT-OF-WAY PLANTER AND/OR TREE PROTECTION ZONE OF PROTECTED TREES: PEDESTRIAN AND EQUIPMENT TRAFFIC THAT COULD COMPACT THE SOIL OR PHYSICALLY DAMAGE ROOTS, PARKING VEHICLES, EQUIPMENT AND/OR PORT-A-POTTIES, STORING OF SOIL, CONSTRUCTION MATERIALS, PETROLEUM PRODUCTS, WATER OR BUILDING REFUSE, DISPOSING OF WASH WATER, PAINT, CEMENT, FUEL OR OTHER POTENTIALLY DAMAGING LIQUIDS, AND ANY OTHER ACTIVITIES THAT MAY HAVE NEGATIVE IMPACTS ON THE TREES AND SOIL.

13. ALL TREES SHALL BE WATERED REGULARLY ACCORDING TO THE RECOMMENDATION OF THE PROJECT ARBORIST.

14. THE APPLICANT SHALL BE FINANCIALLY RESPONSIBLE FOR ANY DAMAGE TO CITY TREES ASSOCIATED WITH THE PROJECT. ACCIDENTAL OR NEGLIGENT ACTIONS THAT DAMAGE CITY TREES MAY RESULT IN A PENALTY. THE MONETARY VALUE OF ANY SUCH DAMAGES WILL BE APPRAISED BY THE CITY URBAN FORESTER OR HIS AUTHORIZED REPRESENTATIVE AND SHALL BE EXPRESSED AS THE MONETARY EQUIVALENT OF ALL LABOR AND MATERIALS REQUIRED TO BRING THE TREE IN QUESTION TO A STATE OF COMPARABLE UTILITY WITH REGARDS TO ITS CONDITION AND FUNCTION PRIOR TO THE BEGINNING OF THE PROJECT.

TREE PRESERVATION MEASURES

VICINITY MAP

PROJECT LOCATION: 320 & 324 ALHAMBRA BLVD, 3004 C ST, 3012 C ST, 317 30TH ST
301 30TH ST, 311 30TH ST, 315 30TH ST

ASSESSORS PARCEL #: 003-0112-001, 003-0112-002, 003-0112-003, 003-0112-004, 003-0112-017, 003-0112-018, 003-0112-020, 003-0112-021

LOT SIZE: 3,049 + 3,049 + 3,049 + 3,049 + 3,200 + 25,600 + 44,867 + 12,800 = 98,663 SF
0.07 + 0.07 + 0.07 + 0.07 + 0.07 + 0.59 + 1.03 + 0.29 = 2.26 ACRES

ZONING: C-2 -SPD (ALHAMBRA CORRIDOR)

GENERAL PLAN: URBAN CORRIDOR LOW

OCCUPANCY / USE: R-2, MULTI-FAMILY RESIDENTIAL

DENSITY: MIN. 20 U/A MAX 110 U/A

LOT COVERAGE: NO REQUIREMENT

PARKING DIMENSIONS: 90 DEGREE STANDARD
Space Width: 8.5 FT
Space Depth: 18 FT
90 DEGREE COMPACT*
Space Width: 8 FT
Space Depth: 15 FT
*Compact car spaces. Up to 50%.
Two-Way Maneuvering Width: 24 FT

FEMA FLOOD ZONE: A99, X

	ZONING REQUIREMENT:	PROVIDED:	MEETING CODE
BUILDING HEIGHT:	Alhambra corridor:Within 300 feet of a residential zone (measured from the street centerline) shall not exceed 35 feet in height.	64'-8"	NO
	C-2 ZONING: 65 FT MAX TRANSITIONAL HEIGHT: 0-39 FT = 45 FT 40-79 = 55 FT 80+ = 65 FT	64'-8"	YES
FRONT SETBACK:	NO REQUIRMENT	0'-0"	YES
STREET SIDE:	NO REQUIRMENT	0'-0"	YES
INTERIOR SIDE SETBACK:	NO REQUIRMENT	0'-0"	YES
REAR SIDE SETBACK:	NO REQUIRMENT	0'-0"	YES
FAR:	MAX 4.00	3.37	YES
OPEN SPACE:	URBAN - 100 SF PER UNIT (33,200 SF REQUIRED)	40,852 SF	YES
PARKING REQUIREMENT:	URBAN - 0.5 SPACES PER DWELLING UNIT (166 REQUIRED)	322	YES
RESIDENTIAL BIKE PARKING:	LONG TERM: 1 space per 2 dwelling units	166	YES
	SHORT TERM: 1 space per 10 dwelling units	33	YES
RETAIL BIKE PARKING:	LONG TERM: 1 space per 10,000 SF	2	YES
	SHORT TERM: 1 space per 2,000 SF	2	YES

ZONING INFORMATION

BUILDING SUMMARY:

LEVEL	GARAGE AREA	RES. AREA	NUMBER OF UNIT TYPES					TOTAL UNITS
			STUDIO	JR ONE BED	ONE BED	TWO BED	THREE BED	
BASEMENT	11,090 SF	-	-		-	-	-	-
LEVEL 1	22,500 SF	62,390 SF	12	7	23	8	-	50
LEVEL 2	22,500 SF	57,565 SF	16	7	23	13	1	60
LEVEL 3	22,500 SF	56,305 SF	16	7	23	14	-	60
LEVEL 4	22,500 SF	56,305 SF	16	7	23	14	-	60
LEVEL 5	8,990 SF	47,815 SF	14	7	21	9	-	51
LEVEL 6	-	51,930 SF	14	7	21	9	-	51
TOTAL	**110,080 SF**	**332,310 SF**	**88**	**42**	**134**	**67**	**1**	**332**
	TOTAL SF: 442,390 SF		OUTDOOR POOL DECK AREA: 10,069 SF					

UNIT SUMMARY:

UNIT TYPE	NUMBER OF UNITS	TYP. SIZE	PERCENT
STUDIO	88	505 SF	26 %
JR. ONE BED	42	560 SF	13 %
ONE BED	134	740 SF	40 %
TWO BED	67	1,110 SF	20 %
THREE BED	1	1,500 SF	1 %
TOTAL	**332**	-	**100 %**

PARKING SUMMARY:

LEVEL	NUMBER OF STALLS
BASEMENT	60
LEVEL 1	52
LEVEL 2	60
LEVEL 3	65
LEVEL 4	65
LEVEL 5	20
TOTAL	**322**

RATIO TO UNITS : 322/332 = 97 %

RESIDENTIAL PROGRAM DATA:

CEILING HEIGHT TARGET	LOBBY: 10'-6" UNITS: 9'-0"
CORRIDOR WIDTH	6'-0"

RESIDENTIAL PROGRAM DATA

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LEVEL 2 3/64" = 1'-0" 2

LEGEND

(E) ORIGINAL BRICK WALL TO RETAIN

LEVEL 1 3/64" = 1'-0" 1

05/07/2025

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LEVEL 4 3/64" = 1'-0" 2

LEVEL 3 3/64" = 1'-0" 1

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LEVEL 6 3/64" = 1'-0" 2

LEVEL 5 3/64" = 1'-0" 1

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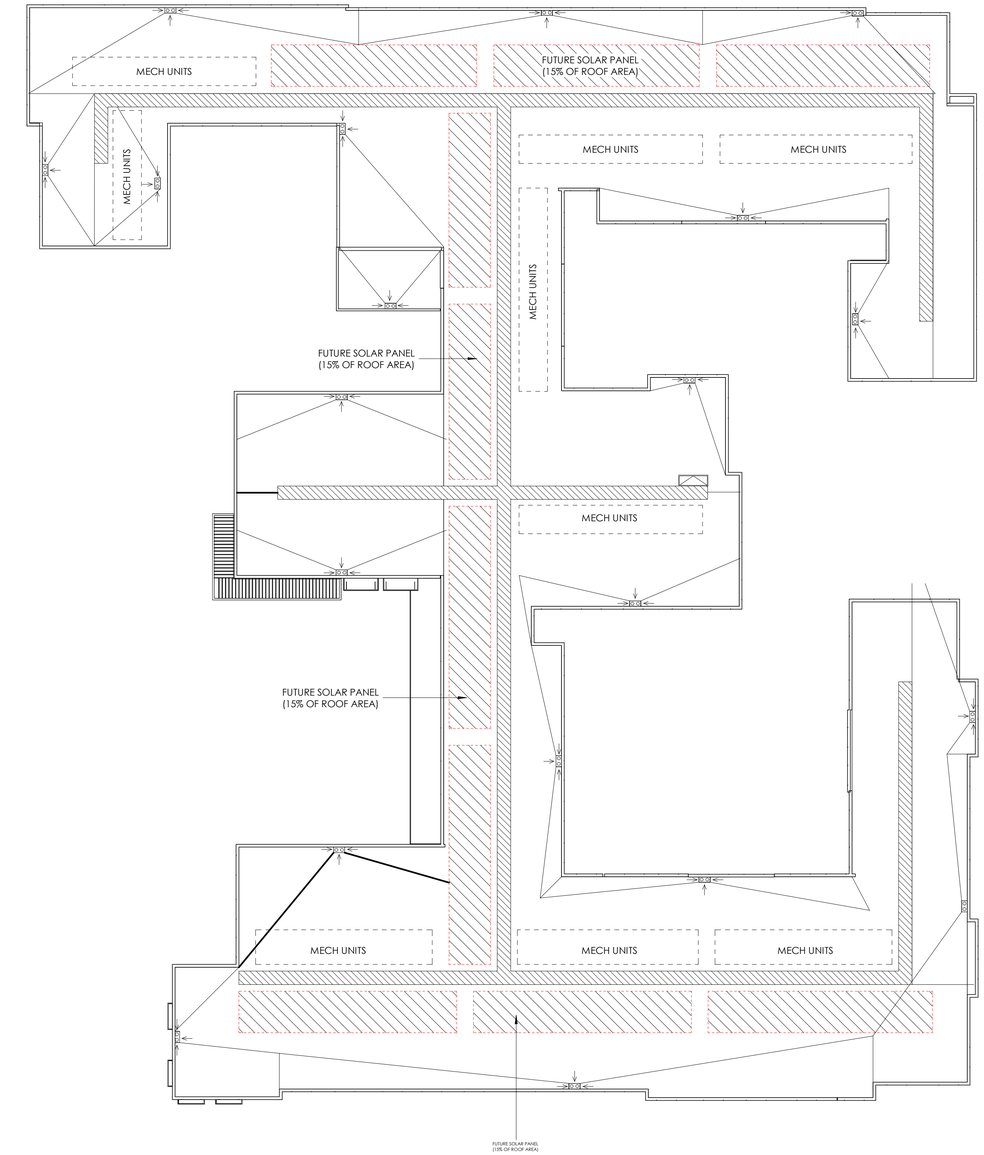

ROOF 3/64" = 1'-0" 1

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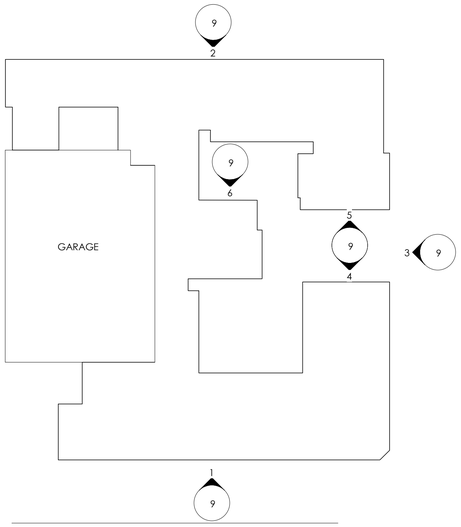
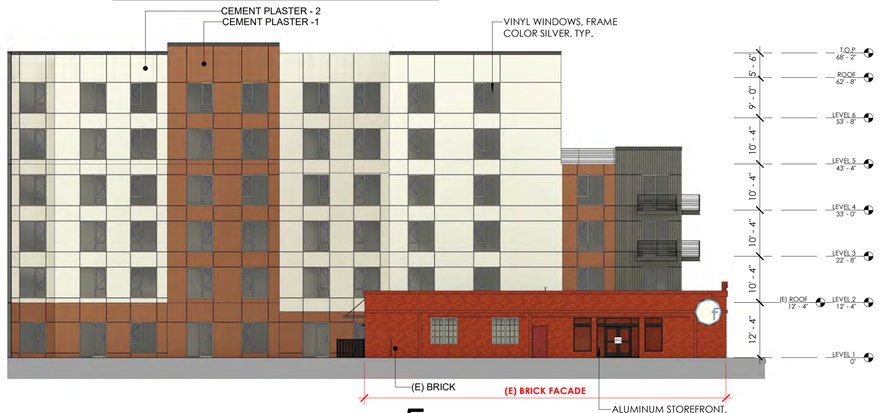


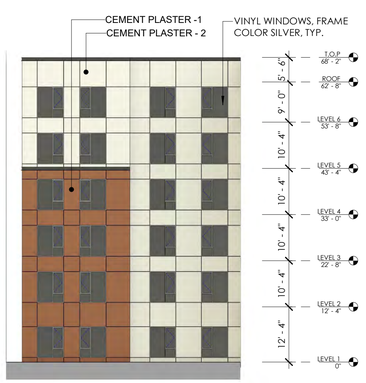
KEY PLAN

EAST ELEVATION 1/16" = 1'-0" 3



ELEVATION 1 - COURTYARD 1/16" = 1'-0" 5

NORTH ELEVATION 1/16" = 1'-0" 2



ELEVATION 2 - COURYARD 1/16" = 1'-0" 6

NORTH ELEVATION - COURTYARD 1/16" = 1'-0" 4

SOUTH ELEVATION 1/16" = 1'-0" 1

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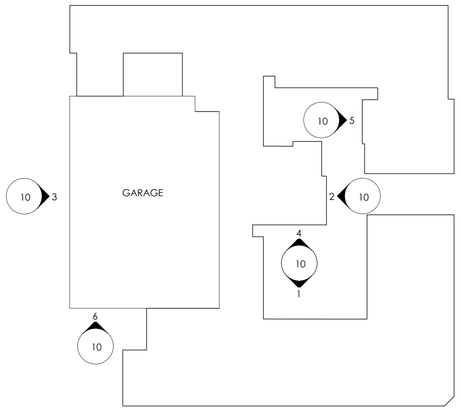
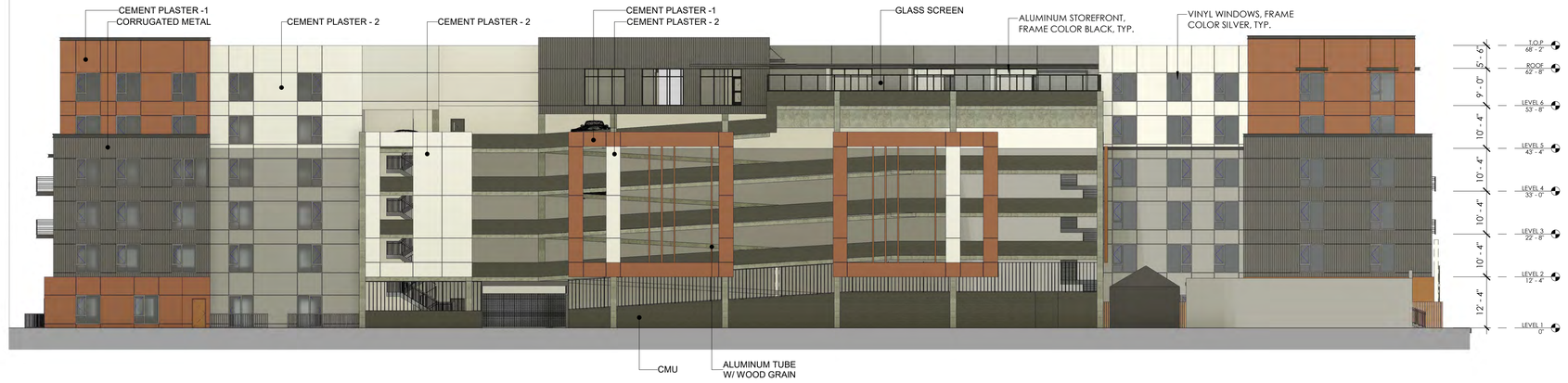


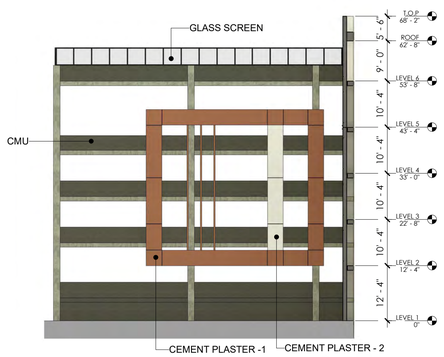
KEY PLAN



WEST ELEVATION 1/16" = 1'-0" 3

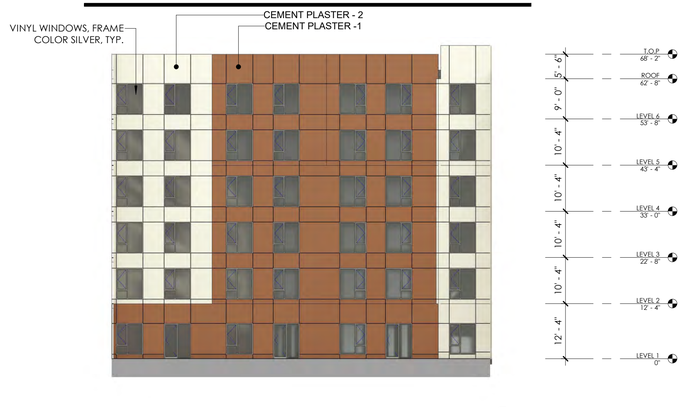
ELEVATION 2 - COURTYARD 1/16" = 1'-0" 5

ELEVATION 4 - COURTYARD 1/16" = 1'-0" 2



SOUTH ELEVATION - GARAGE 1/16" = 1'-0" 6

SOUTH ELEVATION - COURTYARD 1/16" = 1'-0" 4



ELEVATION 3 - COURTYARD 1/16" = 1'-0" 1

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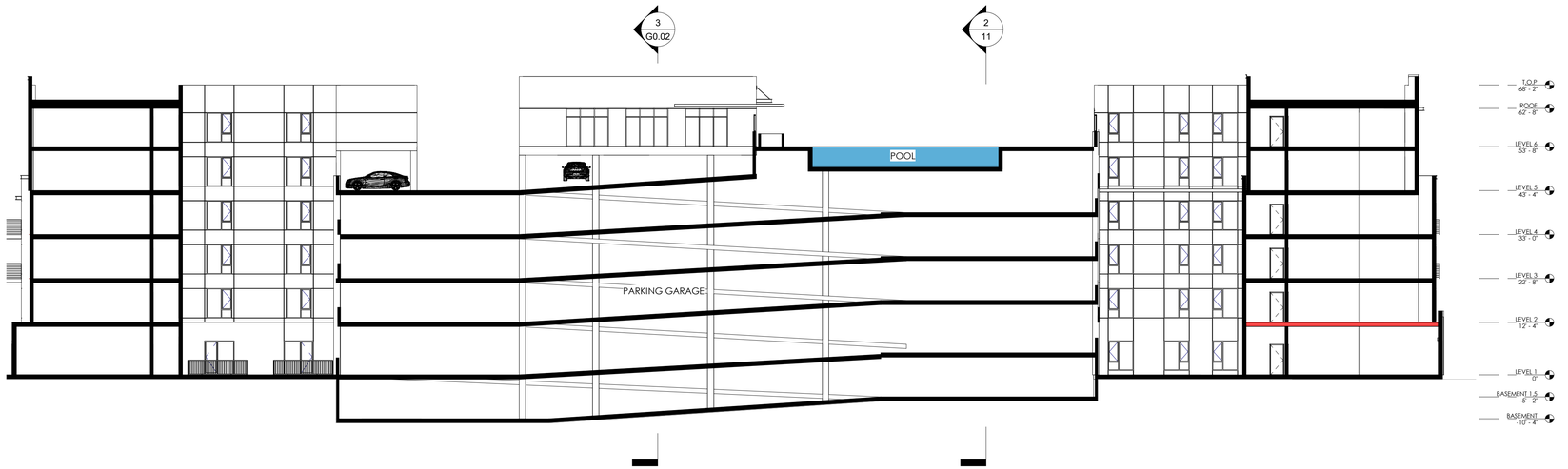
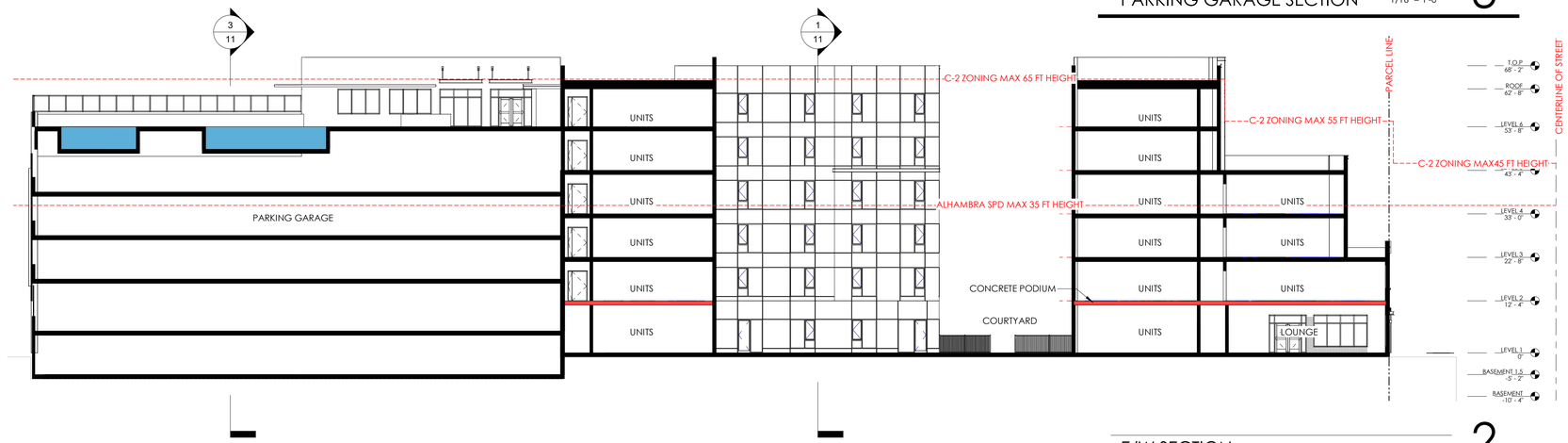
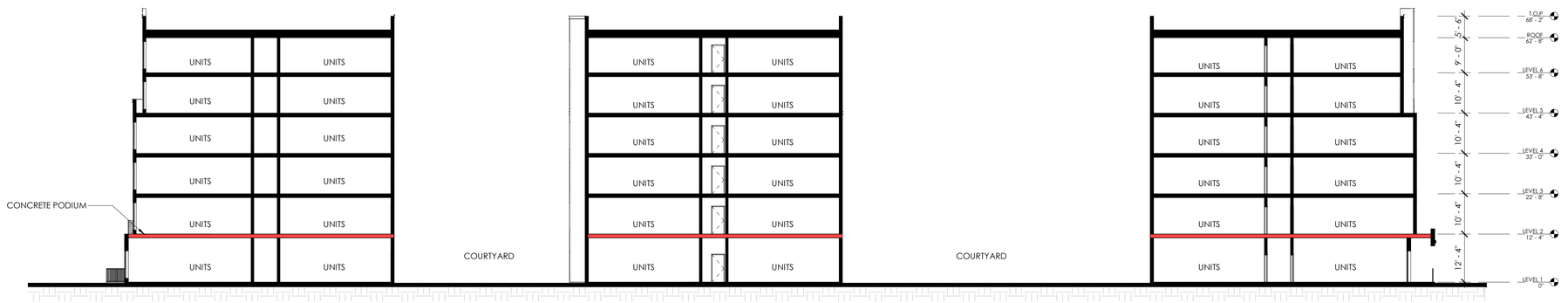


PARKING GARAGE SECTION 1/16" = 1'-0" 3



E/W SECTION 1/16" = 1'-0" 2



N/S SECTION 1/16" = 1'-0" 1

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EAST ELEVATION 1/16" = 1'-0" 3

SOUTH ELEVATION 1/16" = 1'-0" 2

LEVEL 2 3/64" = 1'-0" 1

ENCROACHMENT EXHIBIT

HRGA

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ALHAMBRA REDEVELOPMENT

324 ALHAMBRA BLVD

02/27/2025

23036

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C:\Users\mwoltering\Documents\23036_Mary Ann Bakery_Central_2023_REV2_mwolteringWF3GZ.rvt

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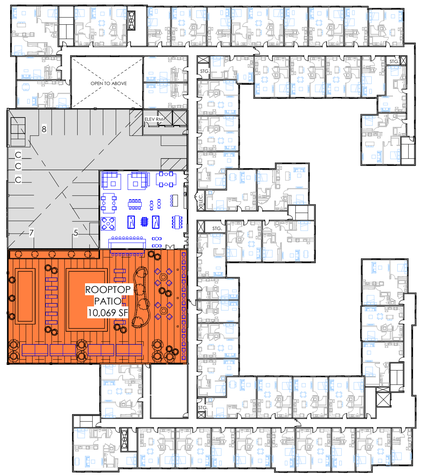

LEVEL 6 1" = 50'-0" 6

LEVEL 4 1" = 50'-0" 4

LEVEL 2 1" = 50'-0" 2

LEVEL 5 1" = 50'-0" 5

LEVEL 3 1" = 50'-0" 3

LEVEL 1 1" = 50'-0" 1

OPEN SPACE SUMMARY:

LEVEL	PUBLIC AREA SF	PRIVATE AREA SF
LEVEL 1	14,410 SF	3,768 SF
LEVEL 2	-	3,657 SF
LEVEL 3	-	1,470 SF
LEVEL 4	-	396 SF
LEVEL 5	6,430 SF	652 SF
LEVEL 6	10,069 SF	-
TOTAL	**30,909 SF**	**9,943 SF**
TOTAL OVERALL = 40,852 SF		

REQUIRED OPEN SPACE: 33,200 SF

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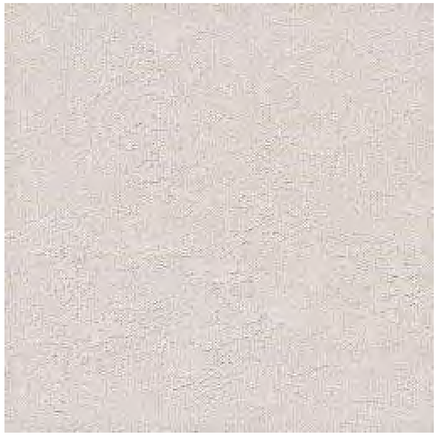
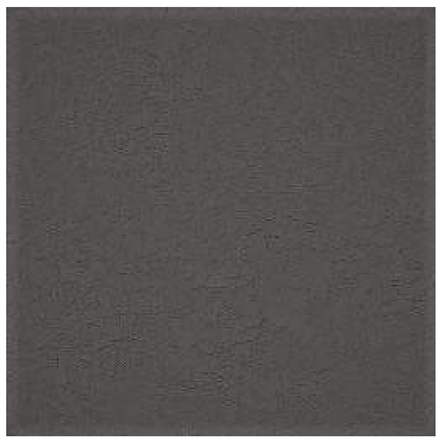
MATERIAL BOARD

CEMENT PLASTER - 1
BRICK RED



CEMENT PLASTER - 2
OFF WHITE

CEMENT PLASTER - 3
GREY



CEMENT PLASTER - 4
DARK GREY

THIN BRICK - 1

CORRUGATED METAL

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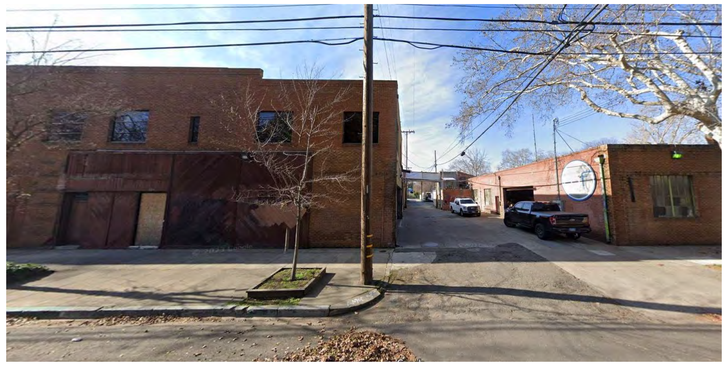
SITE CONTEXT

1- VIEW FROM CORNER OF C ST AND ALHAMBRA BLVD



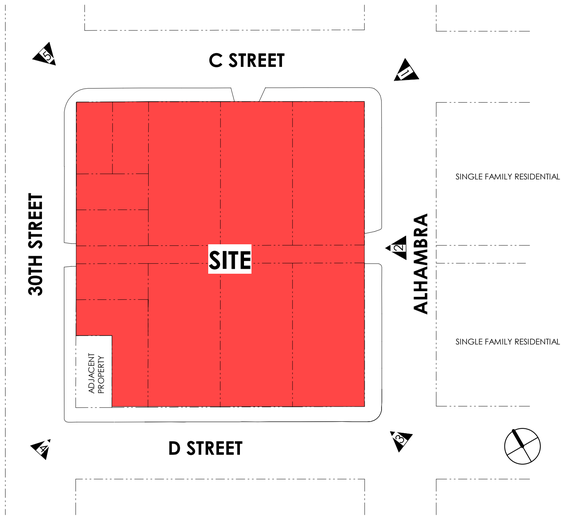
2- NORTHWEST VIEW FROM ALHAMBRA BLVD

3- VIEW FROM CORNER OF ALHAMBRA BLVD AND D ST

4- VIEW FROM CORNER OF D ST AND 30TH ST

5- VIEW FROM CORNER OF C ST AND 30TH ST

CAPITAL CITY FWY



CONTEXT GUIDE

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GRAPHIC SCALE
0 30 60 90 120

ALHAMBRA - ELEVATION 1" = 30'-0" 2

GRAPHIC SCALE
0 30 60 90 120

D STREET - ELEVATION 1" = 30'-0" 1

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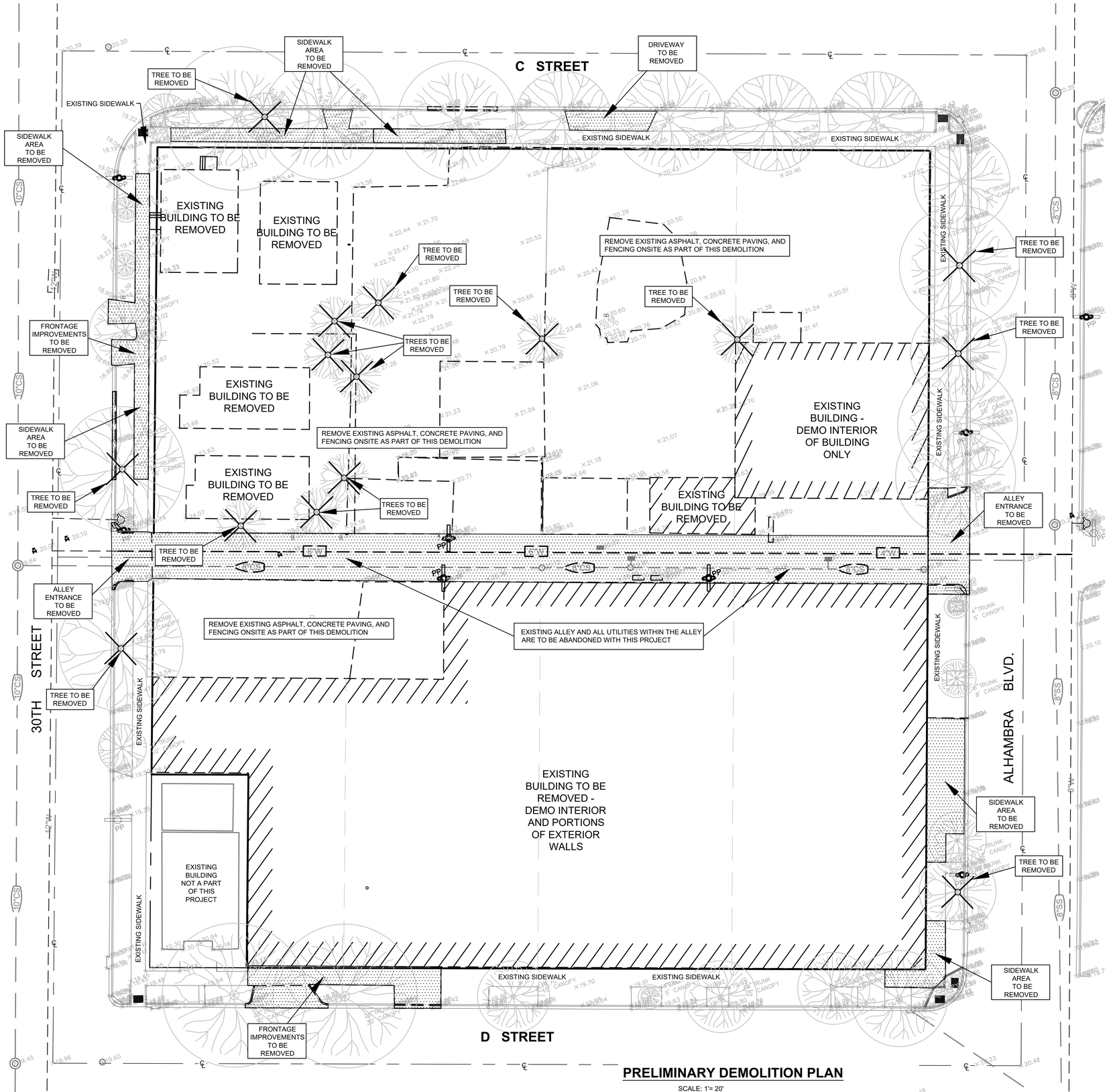


PRELIMINARY DEMOLITION PLAN

SCALE: 1'= 20'

BAR SCALE

0 10 20 40

(IN FEET)
1 inch = 20 feet

Required Tree Preservation Measures for City and Private Protected Trees

1. This project shall contract with a Project Arborist experienced with tree protection and construction that is required to:
   a. Attend preconstruction meetings to approve of and inform contractors of all tree protection measures.
   b. Visit the site before and after demolition, grading and landscaping as well as at least twice each month during construction to ensure that tree protection measures are implemented and maintained.
   c. Be responsible for correcting any site conditions that may negatively impact the trees and revisit the site to ensure that corrective action was properly implemented.
   d. The Project Arborist shall report in writing to Urban Forestry all violations and tree protection failures along with corrective action taken and expected outcomes.
2. All concrete sidewalks and driveways shall be retained throughout construction to protect the roots and soil from the impacts of construction activities.
   a. Existing driveways shall be used as the sole access to the site. Where there are no existing driveways, access shall be limited to a one or two locations outside the dripline of protected trees that have protection from soil compaction with the use of one or more of the following: A 6-inch layer of hardwood chips covered by ¼-inch plywood or trench plates, geotextile fabric covered by a 6-inch layer of hardwood chips or an alternative that is approved by the City Arborist.
3. Right-of-way planters and City trees shall be separated from the construction site with a six-foot high chain link fence that shall remain throughout the duration of the project to protect trees and to prevent construction traffic from compacting the soil in the planters.
4. Construction trailers and port-a-potties shall be placed on existing hardscape or bridged over the tree protection zone or planter so as not to compact soil.
5. Any Regulated Work within the dripline or Tree Protection Zone of a protected tree shall be separately permitted prior to the start of construction and supervised by a Certified Arborist. Submit a tree permit application and a tree protection plan created by a Certified Arborist to UrbanForestry@cityofsacramento.org and refer to the planning project number or off-site project number.
6. All excavation, grading, or trenching within the dripline of a protected tree for the purpose of utility installation, constructing foundations, footings, sidewalks, curbs, gutters, or any other reason shall employ one of the following methods: Hydro-excavation, pneumatic excavation or hand digging and shall be directly supervised by a Certified Arborist.
7. There shall be no excavation deeper than the existing excavation for sidewalks within the dripline of protected trees.
8. There shall be no grade changes within the dripline of protected trees. All grade changes shall be accommodated onsite.
9. There shall be no soil compaction within the dripline of protected trees.
10. There shall be no non-native soil, non-organic matter or structural soil added to the right-of- way planter.
11. The following is a list of activities that require a tree permit if they are to occur or be used within the right-of-way planter and/or within the tree protection zone of protected trees: any regulated work as defined in SCC 12.56, excavation, grade changes, trenches, root or canopy pruning, or boring.
12. The following is a list of activities that are prohibited within the right-of-way planter and/or tree protection zone of protected trees: pedestrian and equipment traffic that could compact the soil or physically damage roots, parking vehicles, equipment and/or port-a-potties, storing of soil, construction materials, petroleum products, water or building refuse, disposing of wash water, paint, cement, fuel or other potentially damaging liquids, and any other activities that may have negative impacts on the trees and soil.
13. All trees shall be watered regularly according to the recommendation of the Project Arborist.
14. The applicant shall be financially responsible for any damage to City trees associated with the project. Accidental or negligent actions that damage City trees may result in a penalty. The monetary value of any such damages will be appraised by the City Urban Forester or his authorized representative and shall be expressed as the monetary equivalent of all labor and materials required to bring the tree in question to a state of comparable utility with regards to its condition and function prior to the beginning of the project.

PEABODY TSUMURA ENGINEERING

REGISTERED PROFESSIONAL ENGINEER
RYAN E. PEABODY
No. C 91261
Exp. 9-30-25
CIVIL
STATE OF CALIFORNIA

CLIENT
HRGA

2277 FAIR OAKS BLVD.
SUITE 220
SACRAMENTO
CA. 95825

PROJECT TITLE
MARY ANN'S
BAKERY APTS.

ALHAMBRA & D ST.
SACRAMENTO
CALIFORNIA

SHEET TITLE
PRELIMINARY DEMOLITION PLAN

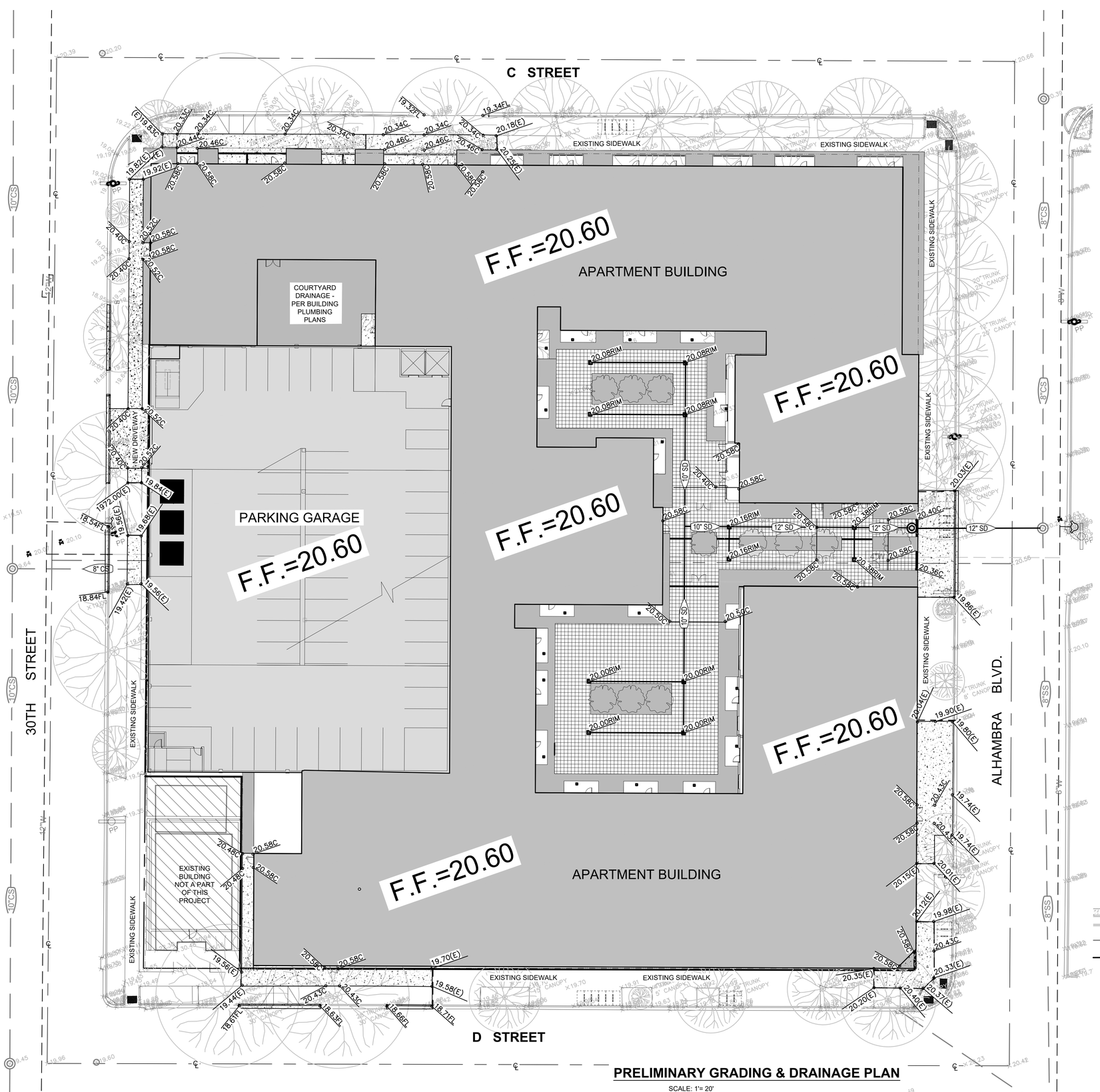
DELTA	REVISION	DATE:

DRAWN/CHK BY: MT / RP

DATE: 2/26/2025

JOB NO.: 0827.010

SHEET NUMBER
D.1



BAR SCALE

0 10 20 40

(IN FEET)
1 inch = 20 feet

PRELIMINARY GRADING & DRAINAGE PLAN

SCALE: 1'= 20'

LEGEND:

- 26.62(E) — EXISTING PAVEMENT GRADE
- 26.62P — PROPOSED PAVEMENT GRADE
- 26.62FL — PROPOSED FLOWLINE GRADE
- 26.62C — PROPOSED CONCRETE GRADE
- PROPOSED CURB&GUTTER
- PROPOSED POURED IN PLACE CURB
- 8"CS — EXISTING COMBINED SEWER & STORM DRAIN LINE
- 8"SD — PROPOSED STORM DRAIN LINE
- PROPOSED PARKING STALLS
- PROPOSED NEW SIDEWALK PROPOSED ALONG PROPERTY FRONTAGE AND BUILDING ENTRANCES
- F.F.=20.60 — PROPOSED BUILDING FINISHED FLOOR ELEVATION
- PROPOSED NEW PAVED PARKING LOT AND DRIVEWAY ENTRANCE TO THE PARKING GARAGE.

PEABODY TSUMURA ENGINEERING

REGISTERED PROFESSIONAL ENGINEER — RYAN E. PEABODY — No. C 91243 — Exp. 9-30-25 — CIVIL — STATE OF CALIFORNIA

CLIENT

HRGA

2277 FAIR OAKS BLVD.
SUITE 220
SACRAMENTO
CA. 95825

PROJECT TITLE

MARY ANN'S
BAKERY APTS.

ALHAMBRA & D ST.
SACRAMENTO
CALIFORNIA

SHEET TITLE

PRELIMINARY GRADING & DRAINAGE PLAN

DELTA	REVISION	DATE:

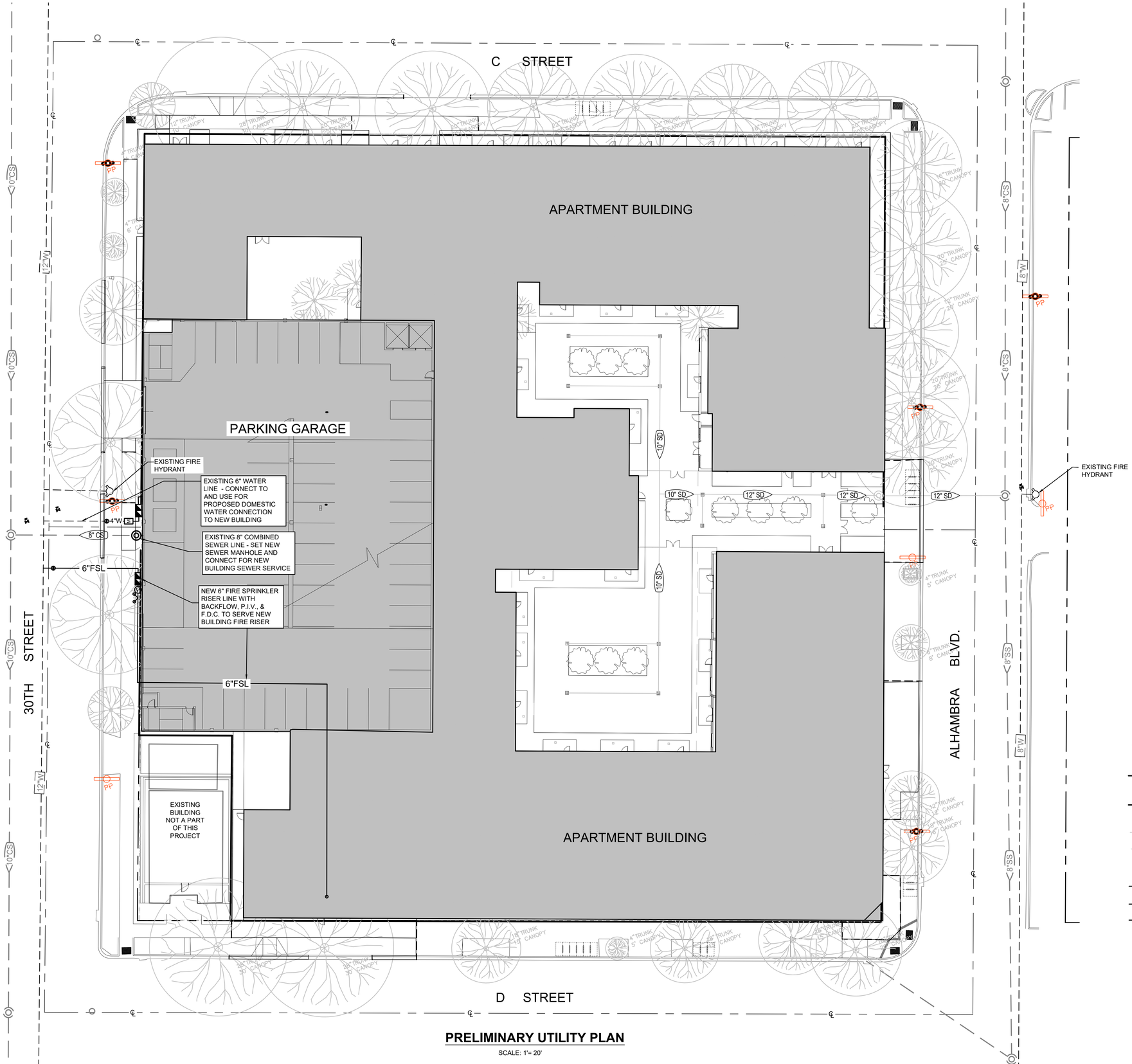
DRAWN/CHK BY: MT / RP

DATE: 2/26/2025

JOB NO.: 0827.010

SHEET NUMBER

G.1



PRELIMINARY UTILITY PLAN

SCALE: 1'= 20'

BAR SCALE

0 10 20 40

(IN FEET)
1 inch = 20 feet

LEGEND:

PROPOSED		EXISTING
	SEWER MANHOLE	
	COMBINED SEWER/STORM DRAIN MANHOLE	
6"SS	SEWER LINE	
	COMBINED SEWER/STORM DRAIN LINE	8"CS
	STORM DRAIN MANHOLE	
8"SD	STORM DRAIN	
	DRAIN INLET	
6"FSL	FIRE SPRINKLER RISER WATER LINE	6"FSL
4"W	WATER LINE	8"W
	WATER VALVE	
P	POST INDICATOR VALVE	P
	FIRE DEPARTMENT CONNECTION	
	FIRE HYDRANT ASSEMBLY	
	DOMESTIC WATER SERVICE & METER BOX	
	R.P. BACKFLOW PREVENTER	
	COMMUNICATIONS MANHOLE	C
	ELECTRICAL OR COMMUNICATIONS VAULT BOX	E

PEABODY TSUMURA ENGINEERING

REGISTERED PROFESSIONAL ENGINEER — MARK E. PEABODY — No. C51063 — EXP. 9-30-25 — CIVIL — STATE OF CALIFORNIA

CLIENT

HRGA

2277 FAIR OAKS BLVD.
SUITE 220
SACRAMENTO
CA. 95825

PROJECT TITLE

MARY ANN'S
BAKERY APTS.

ALHAMBRA & D ST.
SACRAMENTO
CALIFORNIA

SHEET TITLE

PRELIMINARY
UTILITY PLAN

DELTA	REVISION	DATE:

DRAWN/CHK BY: MT / RP

DATE: 2/26/2025

JOB NO.: 0827.010

SHEET NUMBER

U.1

CANDIDATE PLANT LIST

Botanical Name	Common Name	Water Use
Street Trees		
Acer rubrum 'RedPointe'	RedPointe Red Maple	Med
Ginkgo biloba 'Princeton Sentry'	Princeton Sentry Ginkgo	Med
Accent & Screening Trees		
Chitalpa tashkentensis 'Pink Dawn'	Pink Dawn Chitalpa Tree	Low
Cercis Canadensis 'Oklahoma'	Eastern Redbud	Low
Podocarpus elongatus 'Monmal'	Icee Blue Podocarpus	Med
Dodonaea viscosa 'Purpurea'	Purple Hopseed Bush	Low
Prunus caroliniana 'Compacta'	Compact Cherry Laurel	Med
Acer palmatum 'Sangu Kaku'	Coral Bark Maple	Med
Acer palmatum 'Bloodgood'	Japanese Maple	Med
Shrubs/Perennials/Grasses		
Agave 'Blue Flame	Blue Flame Agave	Low
Asparagus densiflorus 'Meyers'	Foxtail Fern	Med
Buxus x 'Green Velvet'	Green Velvet Boxwood	Med
Calamagrostis a. 'Karl Forester'	Feather Reed Grass	Low
Calandrinia spectabilis 'Shining Pink'	Rock Purslane	Low
Callistemon v. 'Little John'	Dwarf Bottle Brush	Low
Camellia sasanqua 'Apple Blossom'	Camellia	Med
Chondropetalum tecorum	Cape Rush	Med
Dianella revoluta 'Cool Vista'	Cool Vista Flax Lily	Med
Hesperaloe parvifolia 'Brake Lights'	Brake Lights Red Yucca	Low
Lomandra 'Lime Tuff'	Lime Tuff Mat Rush	Med
Lomandra 'Platinum Beauty'	Variegated Mat Rush	Med
Lagerstroemia indica 'Petite Plum'	Dwarf Crepe Myrtle	Low
Nandina domestica 'Lemon Lime'	Heavenly Bamboo	Low
Groundcovers		
Gardenia radicans 'Variegata'	Groundcover Gardenia	Med
Pachysandra terminalis	Japanese Spurge	Med
Trachelospermum asiaticum	Asian Star Jasmine	Med

PROJECT LANDSCAPE

TOTAL PROPOSED LANDSCAPE AREA: 8,418 SF

WATER CONSERVATION STATEMENT

The proposed design shall be in compliance with the criteria of the Model Water Efficient Landscape Ordinance, and such criteria shall be applied for the efficient use of water in the irrigation design plan.

TREE REPLACEMENT PLAN

Proposed removal of:
Tree #8951, Chinese Elm, 34" DSH, private protected tree
Tree #8954, Pecan, 29" DSH, private protected tree
Tree #59878, American Elm, 38" DSH, City tree, replacement waiver requested
Tree #59879, American Elm, 38" DSH, City tree
Tree #59888, Coast Redwood, 9" DSH, City tree, replacement waiver requested
Tree #59896, Zelkova, 30" DSH, City tree, replacement waiver requested
Tree #59897, London Plane, 18" DSH, City tree, replacement waiver requested
Tree #59903, London Plane, 20" DSH, City tree, replacement waiver requested

TOTAL DSH Aggregate for Mitigation = 101"

Proposed Mitigation:
17 (24" Box) New Accent Trees = 34" mitigation
5 (24" Box) Replacement Street Trees = 10" mitigation

TOTAL Mitigation Provided = 44"

TREE PROTECTION NOTES

REQUIRED TREE PRESERVATION MEASURES FOR CITY AND PRIVATE PROTECTED TREES

1. THIS PROJECT SHALL CONTRACT WITH A PROJECT ARBORIST EXPERIENCED WITH TREE PROTECTION AND CONSTRUCTION THAT IS REQUIRED TO:
   A. ATTEND THE PRECONSTRUCTION MEETINGS TO APPROVE OF AND INFORM CONTRACTORS OF ALL TREE PROTECTION MEASURES.
   B. VISIT THE SITE BEFORE AND AFTER DEMOLITION, GRADING AND LANDSCAPING AS WELL AS AT LEAST TWICE EACH MONTH DURING CONSTRUCTION TO ENSURE THAT TREE PROTECTION MEASURES ARE IMPLEMENTED AND MAINTAINED.
   C. BE RESPONSIBLE FOR CORRECTING ANY SITE CONDITIONS THAT MAY NEGATIVELY IMPACT THE TREES AND REVISIT THE SITE TO ENSURE CORRECTIVE ACTION WAS PROPERLY IMPLEMENTED.
   D. THE PROJECT ARBORIST SHALL REPORT IN WRITING TO URBAN FORESTRY ALL VIOLATIONS AND TREE PROTECTION FAILURES ALONG WITH CORRECTIVE ACTION TAKEN AND EXPECTED OUTCOMES.
2. ALL CONCRETE SIDEWALKS AND DRIVEWAYS SHALL BE RETAINED THROUGHOUT CONSTRUCTION TO PROTECT THE ROOTS AND SOIL FROM THE IMPACTS OF CONSTRUCTION ACTIVITIES.
   A. EXISTING DRIVEWAYS SHALL BE USED AS THE SOLE ACCESS TO THE SITE. WHERE THERE ARE NO EXISTING DRIVEWAYS, ACCESS SHALL BE LIMITED TO A ONE OR TWO LOCATIONS OUTSIDE THE DRIPLINE OF PROTECTED TREES THAT HAVE PROTECTION FROM SOIL COMPACTION WITH THE USE OF ONE OR MORE OF THE FOLLOWING: A 6-INCH LAYER OF HARDWOOD CHIPS COVERED BY ¾-INCH PLYWOOD OR TRENCH PLATES, GEOTEXTILE FABRIC COVERED BY A 6-INCH LAYER OF HARDWOOD CHIPS OR AN ALTERNATIVE THAT IS APPROVED BY THE CITY ARBORIST.
3. RIGHT-OF-WAY PLANTERS AND CITY TREES SHALL BE SEPARATED FROM THE CONSTRUCTION SITE WITH A SIX-FOOT HIGH CHAIN LINK FENCE THAT SHALL REMAIN THROUGHOUT THE DURATION OF THE PROJECT TO PROTECT TREES AND TO PREVENT CONSTRUCTION TRAFFIC FROM COMPACTING THE SOIL IN THE PLANTERS.
4. CONSTRUCTION TRAILERS AND PORT-A-POTTIES SHALL BE PLACED ON EXISTING HARDSCAPE OR BRIDGED OVER THE TREE PROTECTION ZONE OR PLANTER SO AS NOT TO COMPACT SOIL.
5. ANY REGULATED WORK WITHIN THE DRIPLINE OR TREE PROTECTION ZONE OF A REGULATED TREE SHALL BE SEPARATELY PERMITTED PRIOR TO THE START OF CONSTRUCTION AND SUPERVISED BY A CERTIFIED ARBORIST. SUBMIT A TREE PERMIT APPLICATION AND A TREE PROTECTION PLAN CREATED BY A CERTIFIED ARBORIST TO URBANFORESTRY@CITYOFSACRAMENTO.ORG AND REFER TO THE PLANNING PROJECT NUMBER OR OFF-SITE PROJECT NUMBER.
6. ALL EXCAVATION, GRADING, OR TRENCHING WITHIN THE DRIPLINE OF A PROTECTED TREE FOR THE PURPOSE OF UTILITY INSTALLATION, CONSTRUCTING FOUNDATIONS, FOOTINGS, SIDEWALKS, CURBS, GUTTERS, OR ANY OTHER REASON SHALL EMPLOY ONE OF THE FOLLOWING METHODS: HYDRO-EXCAVATION, PNEUMATIC EXCAVATION, OR HAND DIGGING AND SHALL BE DIRECTLY SUPERVISED BY A CERTIFIED ARBORIST.
7. THERE SHALL BE NO EXCAVATION DEEPER THAN THE EXISTING EXCAVATION FOR SIDEWALKS WITHIN THE DRIPLINE OF PROTECTED TREES.
8. THERE SHALL BE NO GRADE CHANGES WITHIN THE DRIPLINE OF PROTECTED TREES. ALL GRADE CHANGES SHALL BE ACCOMMODATED ONSITE.
9. THERE SHALL BE NO SOIL COMPACTION WITHIN THE DRIPLINE OF PROTECTED TREES.
10. THERE SHALL BE NO NON-NATIVE SOIL, NON-ORGANIC MATTER OR STRUCTURAL SOIL ADDED TO THE RIGHT-OF-WAY PLANTER.
11. THE FOLLOWING IS A LIST OF ACTIVITIES THAT REQUIRE A TREE PERMIT IF THEY ARE TO OCCUR OR BE USED WITHIN THE RIGHT-OF-WAY PLANTER AND/OR WITHIN THE TREE PROTECTION ZONE OF PROTECTED TREES: ANY REGULATED WORK AS DEFINED IN SCC 12.56, EXCAVATION, GRADE CHANGES, TRENCHES, ROOT OR CANOPY PRUNING, OR BORING.
12. THE FOLLOWING IS A LIST OF ACTIVITIES THAT ARE PROHIBITED WITHIN THE RIGHT-OF-WAY PLANTER AND/OR TREE PROTECTION ZONE OF PROTECTED TREES: PEDESTRIAN AND EQUIPMENT TRAFFIC THAT COULD COMPACT THE SOIL OR PHYSICALLY DAMAGE ROOTS, PARKING VEHICLES, EQUIPMENT AND/OR PORT-A-POTTIES, STORING OF SOIL, CONSTRUCTION MATERIALS, PETROLEUM PRODUCTS, WATER OR BUILDING REFUSE, DISPOSING OF WASH WATER, PAINT, CEMENT, FUEL OR OTHER POTENTIALLY DAMAGING LIQUIDS, AND ANY OTHER ACTIVITIES THAT MAY HAVE NEGATIVE IMPACTS ON THE TREES AND SOIL.
13. ALL TREES SHALL BE WATERED REGULARLY ACCORDING TO THE RECOMMENDATION OF THE PROJECT ARBORIST.
14. THE APPLICANT SHALL BE FINANCIALLY RESPONSIBLE FOR ANY DAMAGE TO CITY TREES ASSOCIATED WITH THE PROJECT. ACCIDENTAL OR NEGLIGENT ACTIONS THAT DAMAGE CITY TREES MAY RESULT IN A PENALTY. THE MONETARY VALUE OF ANY SUCH DAMAGES WILL BE APPRAISED BY THE CITY URBAN FORESTER OR HIS AUTHORIZED REPRESENTATIVE AND SHALL BE EXPRESSED AS THE MONETARY EQUIVALENT OF ALL LABOR AND MATERIALS REQUIRED TO BRING THE TREE IN QUESTION TO A STATE OF COMPARABLE UTILITY WITH REGARDS TO ITS CONDITION AND FUNCTION PRIOR TO THE BEGINNING OF THE PROJECT.

NeoTeric
Design Group
913 piedmont dr, sacramento ca 95822
916.662.0055 | www.neotericlandscapes.com

ALHAMBRA REDEVELOPMENT

324 ALHAMBRA BLVD. SACRAMENTO

PRELIMINARY
LANDSCAPE PLAN
5/7/2025

L3.0

California Tree and Landscape Consulting, Inc.
411 Grass Valley Hwy, #1050, Auburn, CA 95603 (530) 745-4086

October 23, 2024, Revised May 5, 2025

John Demas
% Mary Woltering
HRGA
2277 Fair Oaks Blvd., Studio 220
Sacramento, CA 95825
(916) 569-8103
Via Email: mwoltering@hrgarchitects.com

PRE-DEVELOPMENT ARBORIST REPORT & TREE INVENTORY

RE: Mary Ann's Bakery, (APNs 003-0112-003, -004, -021, -018, -020 & -017); City of Sacramento Jurisdiction

Executive Summary:
Mary Woltering of HRGA, on behalf of the property owner, contacted California Tree and Landscape Consulting, Inc. to inventory and evaluate the trees on the site or within 25' of development for purposes of providing preliminary tree information for planning for development of the parcel. The property encompasses the majority of the block of 30th St., D St., Alhambra Blvd. and C St. and includes 6 parcels: APNs 003-0112-003, -004, -021, -018, -020 & -017 within the jurisdiction of the City of Sacramento. See Supporting Information Appendix A –Tree Location Map.

Edwin E. Stirtz, ISA Certified Arborist #WE-0510A, was on site March 11, 2024. A total of 45 trees were evaluated. 11 trees are on the property, 2 of which are considered 'Private-Protected' by the City of Sacramento Tree Preservation code chapter 12.56. 34 trees are protected City street trees.

Table 1 - Tree Inventory Summary

Tree Species	Trees Inventoried	Trees located on the Parcel[1]	Protected by Sacramento City Tree Preservation Code	Proposed for Removal	Trees with Pruning Requirements
American elm, *Ulmus americana*	2	0	2 (Street Trees)	2	-
American sweetgum, *Liquidambar styraciflua*	1	0	1 (Street Tree)	0	0
Chinese elm, *Ulmus parvifolia*	1	1	1 (Private Protected)	1	0
Chinese hackberry, *Celtis sinensis*	1	1	0	1	1
Chinese pistache, *Pistacia chinensis*	5	0	5 (Street Trees)	0	1

[1] CalTLC is not a licensed land surveyor. Tree ownership was not determined. Conclusions within this report are based on existing fences or other landmarks which may not represent the actual property boundary.

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Tree Species	Trees Inventoried	Trees located on the Parcel[1]	Protected by Sacramento City Tree Preservation Code	Proposed for Removal	Trees with Pruning Requirements
Coast live oak, *Quercus agrifolia*	2	1	1 (Street Tree)	1	1
Coast redwood, *Sequoia sempervirens*	1	0	1 (Street Tree)	1	-
Eastern redbud, *Cercis canadensis*	1	0	1 (Street Tree)	0	0
Evergreen pear, *Pyrus kawakamii*	1	0	1 (Street Tree)	0	0
Fruiting pear, *Pyrus sp.*	1	1	0	0	0
Glossy privet, *Ligustrum lucidum*	1	1	0	1	-
Italian cypress, *Cupressus sempervirens*	1	1	0	1	-
London plane tree, *Platanus × hispanica*	11	0	11 (Street Trees)	2	9
Maidenhair tree, *Ginkgo biloba*	2	0	2 (Street Trees)	0	0
Monterey pine, *Pinus radiata*	1	1	0	0	0
Pecan, *Carya illinoinensis*	3	3	1 (Private Protected)	3	-
Red oak, *Quercus rubra*	1	0	1 (Street Tree)	0	1
Scarlet oak, *Quercus coccinea*	1	0	1 (Street Tree)	0	0
Tree-of-Heaven, *Ailanthus altissima*	1	1	0	1	-
Zelkova, *Zelkova serrata*	7	0	7 (Street Trees)	1	6
Total	**45**	**11**	**36**	**15[2]**	**19**

See Appendices for specific information on each tree and preservation/pruning requirements and/or restrictions

METHODS

Appendix 2 in this report is the detailed inventory and recommendations for the trees. The following terms and Table A – Ratings Description will further explain our findings.

A Level 2 – Basic Visual Assessment was performed in accordance with the International Society of Arboriculture's best management practices. This assessment level is limited to the observation of conditions and defects which are readily visible. Additional limiting factors, such as blackberries, poison oak, and/or debris piled at the base of a tree can inhibit the visual assessment.

Tree Location: The GPS location of each tree was collected using the ESRI's ArcGIS collector application on an Apple iPhone or Android device. The data was then processed in ESRI's ArcMap to produce the tree location map.

Tree Measurements: DSH (diameter at standard height) is normally measured at 4'6" (above the average ground height for "Urban Forestry"), but if that varies then the location where it is measured is noted. A steel diameter tape was used to measure the DSH for trees less than 23" in diameter and a steel diameter tape for trees greater than 23". A Stanley laser distance meter was used to measure distances. Canopy radius measurements may also have been estimated due to obstructions.

[2] A fee waiver is requested for Trees #59878, #59888, #59896, #59897 & #59903 due to poor condition and utility conflicts.

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TERMS

Field Tag #	The pre-stamped tree number on the tag which is installed at approximately 6 feet above ground level on the north side of the tree.
City Tag #	The number listed on the City of Sacramento tree inventory in the ARC GIS system found online at: saccity.maps.arcgis.com
Species	The species of a tree is listed by our local and correct common name and botanical name by genus (capitalized) and species (lower case). Oaks frequently cross-pollinate and hybridize, but the identification is towards the strongest characteristics.
DBH	Diameter at breast height is normally measured at 4'6" (above the average ground height for "Urban Forestry"), but if that varies then the location where it is measured is noted in the next column "measured at"
DSH	"Diameter at standard height" is the same as DBH except as follows (according to the City of Sacramento requirements): (1) For a tree that branches at or below 4.5 feet, DSH means the diameter at the narrowest point between the grade and the branching point; and (2) For a tree with a common root system that branches at the ground, DSH means the sum of the diameter of the largest trunk plus one-half the cumulative diameter of the remaining trunks at 4.5 feet above natural grade.
Measured at	Height above average ground level where the measurement of DSH was taken
Canopy radius and Protection Zone Area	The farthest extent of the crown composed of leaves and small twigs. Most trees are not evenly balanced. This measurement represents the longest extension from the trunk to the outer canopy. The dripline measurement is from the center point of the tree and is shown on the Tree Location Map as a circle. This measurement further defines the radius of the protection zone to be specified on any development plans unless otherwise indicated in the arborist recommendations, Appendix 2.
Critical Root Zone	The radius of the critical root zone is a circle equal to the trunk diameter inches converted to feet and factored by tree age, condition and health pursuant to the industry standard. Best Management Practices: Managing Trees During Construction, the companion publication to the Approved American National Standard, provides guidance regarding minimum tree root protection zones for long term survival. In instances where a tree is multi-stemmed the protected root zone is equal to the extrapolated diameter (sum of the area of each stem converted to a single stem) factored by tree age, condition and health.
Arborist Rating	Subjective to condition and is based on both the health and structure of the tree. All of the trees were rated for condition, per the recognized national standard as set up by the Council of Tree and Landscape Appraisers and the International Society of Arboriculture (ISA) on a numeric scale of 5 (being the highest) to 0 (the worst condition, dead) as in Chart A. The rating was done in the field at the time of the measuring and inspection.

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Arborist Ratings

No problem(s)	Excellent	**5**
No apparent problem(s)	Good	**4**
Minor problem(s)	Fair	**3**
Major problem(s)	Fair to Poor	**2**
Extreme problem(s)	Poor	**1**
Dead	Dead	**0**

Rating #0: This indicates a tree that has no significant sign of life.
Rating #1: The problems are extreme. This rating is assigned to a tree that has structural and/or health problems that no amount of work or effort can change. The issues may or may not be considered a dangerous situation.
Rating #2: The tree has major problems. If the option is taken to preserve the tree, its condition could be improved with correct arboricultural work including, but not limited to: pruning, cabling, bracing, bolting, guying, spraying, mistletoe removal, vertical mulching, fertilization, etc. If the recommended actions are completed correctly, hazard can be reduced and the rating can be elevated to a 3. If no action is taken the tree is considered a liability and should be removed.
Rating #3: The tree is in fair condition. There are some minor structural or health problems that pose no immediate danger. When the recommended actions in an arborist report are completed correctly the defect(s) can be minimized or eliminated.
Rating #4: The tree is in good condition and there are no apparent problems that a Certified Arborist can see from a visual ground inspection. If potential structural or health problems are tended to at this stage future hazard can be reduced and more serious health problems can be averted.
Rating #5: No problems found from a visual ground inspection. Structurally, these trees have properly spaced branches and near perfect characteristics for the species. Highly rated trees are not common in natural or developed landscapes. No tree is ever perfect especially with the unpredictability of nature, but with this highest rating, the condition should be considered excellent.

Notes: Provide notable details about each tree which are factors considered in the determination of the tree rating including: (a) condition of root crown and/or roots; (b) condition of trunk; (c) condition of limbs and structure; (d) growth history and twig condition; (e) leaf appearance; and (f) dripline environment. Notes also indicate if the standard tree evaluation procedure was not followed (for example - why dsh may have been measured at a location other than the standard 54"). Additionally, notes will list any evaluation limiting factors such as debris at the base of a tree.

Development Restrictions/Actions: Recommended actions to increase health and longevity.

Development Impacts: Projected development impacts are based solely on distance relationships between tree location and grading. Field inspections and findings during the project at the time of grading and trenching can change relative impacts. Closely followed guidelines and requirements can result in a higher chance of survival, while requirements that are overlooked can result in a dramatically lower chance of survival. Impacts are measured as follows:

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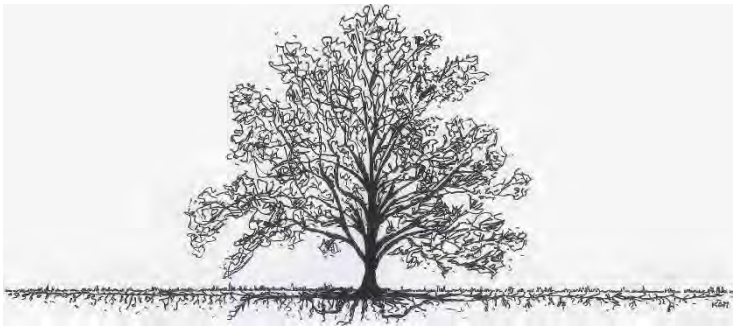
Impact Term:	Long Term Result of Impact:
Negligible	Tree is unlikely to show any symptoms. Chance of survival post development is excellent. Impacts to the Protected Root Zone are less than 5%.
Minor	Tree is likely to show minor symptoms. Chance of survival post development is good. Impacts to the Protected Root Zone are less than 15% and species tolerance is good.
Moderate	Tree is likely to show moderate symptoms. Chance of survival post development is fair. Impacts to the Protected Root Zone are less than 35% and species tolerance is good or moderate.
Severe	Tree is likely to show moderate symptoms annually and a pattern of decline. Chance of long term survival post development is low. Impacts to the Protected Root Zone are up to 50% and species tolerance is moderate to poor.
Critical	Tree is likely to show moderate to severe symptoms annually and a pattern of decline. Chance of long term survival post development is negligible. Impacts to the Protected Root Zone are up to 80%.

Discussion

Trees need to be protected from normal construction practices if they are to remain healthy and viable on the site. Our recommendations are based on experience and the County ordinance requirements to enhance tree longevity. This requires their root zones remain intact and viable despite the use of heavy equipment to install foundations, driveways, underground utilities, and landscape irrigation systems. Simply walking and driving on soil can have serious consequences for tree health. Tree Protection measures should be incorporated into the site plans in order to protect the trees.

Root Structure

The majority of a tree's roots are contained in a radius from the main trunk outward approximately two to three times the canopy of the tree. These roots are located in the top 6" to 3' of soil. It is a common misconception that a tree underground resembles the canopy. The correct root structure of a tree is in the drawing below. All plants' roots need both water and air for survival. Poor canopy development or canopy decline in mature trees after development is often the result of inadequate root space and/or soil compaction.



The reality of where roots are generally located

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Our native oak trees are easily damaged or killed by having the soil within the Protected Root Zone (PRZ) disturbed or compacted. All of the work initially performed around protected trees that will be saved should be done by people rather than by wheeled or track type tractors. Oaks are fragile giants that can take little change in soil grade, compaction, or warm season watering. Don't be fooled into believing that warm season watering has no adverse effects on native oaks. Decline and eventual death can take as long as 5-20 years with poor care and inappropriate watering. Oaks can live hundreds of years if treated properly during construction, as well as later with proper pruning, and the appropriate landscape/irrigation design.

Arborist Classifications
There are different types of Arborists:

Tree Removal and/or Pruning Companies: These companies may be licensed by the State of California to do business, but they do not necessarily know anything about trees;

Arborists: Arborist is a broad term. It is intended to mean someone with specialized knowledge of trees but is often used to imply knowledge that is not there.

ISA Certified Arborist: An International Society of Arboriculture Certified Arborist is someone who has been trained and tested to have specialized knowledge of trees. You can look up certified arborists at the International Society of Arboriculture website: isa-arbor.org.

Consulting Arborist: An American Society of Consulting Arborists Registered Consulting Arborist is someone who has been trained and tested to have specialized knowledge of trees and trained and tested to provide high quality reports and documentation. You can look up registered consulting arborists at the American Society of Consulting Arborists website: asca-consultants.org

RECOMMENDATIONS: SUMMARY OF TREE PROTECTION MEASURES FOR SITE PLANNING

The Owner and/or Developer should ensure the project arborist's protection measures are incorporated into the site plans and followed. Tree specific protection measures can be found in Appendix 2 – Tree Information Data.

- Trees to sustain encroachment for driveway abandonment shall have oversight by the project arborist at the time excavation/existing improvements are removed.

- **The stumps of the trees to be removed that are within the root zone of the City trees shall be removed using a backhoe or other piece of grading equipment only with supervision by the project arborist.** Roots from the other nearby trees may have intertwined and will be required to be severed and cut clean during the removal process. Pulling on the stumps with equipment will likely result in the lifting of the asphalt in the parking areas on the adjacent parcels.
- Clearance pruning should include removal of all the lower foliage that may interfere with equipment PRIOR to having grading or other equipment on site or in the access path. The Project Arborist should approve the extent of foliage elevation and oversee the pruning to be performed by a contractor who is an ISA Certified Arborist.
- Clearly designate an area on the site outside the drip line of all trees on the adjacent parcels where construction materials may be stored and parking can take place. No materials or parking shall take place within the root zones of trees to be retained.

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- Sewer line installation and trenching inside the root protection zone of trees to remain on the site shall be directly supervised by the project arborist. A hydraulic or air spade may be required for digging and placement of pipes underneath the roots, or boring of deeper trenches underneath the roots.
- Follow all of the General Development Guidelines, Appendix 3, for all trees not identified as requiring special preservation measures in the summary and in Appendix 2.
- ALL construction related activities within the critical root zone of any protected tree shall conform/comply with the ANSI Standards for Tree Maintenance & Safety as well as the ISA Best Management practices for the applicable activities.

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ISA Certified Arborist #WE-0510A, TRAQ

Appendix 1 – Tree Location Map
Appendix 2 – Tree Data and Tree Specific Recommendations
Appendix 3 – General Development Guidelines
Appendix 4 – Site Photographs

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Mary Ann's Bakery - North Portion

Sacramento, CA

Prepared for: HRGA

Map of Property Showing Approximate Tree Locations

Prepared by CalTLC

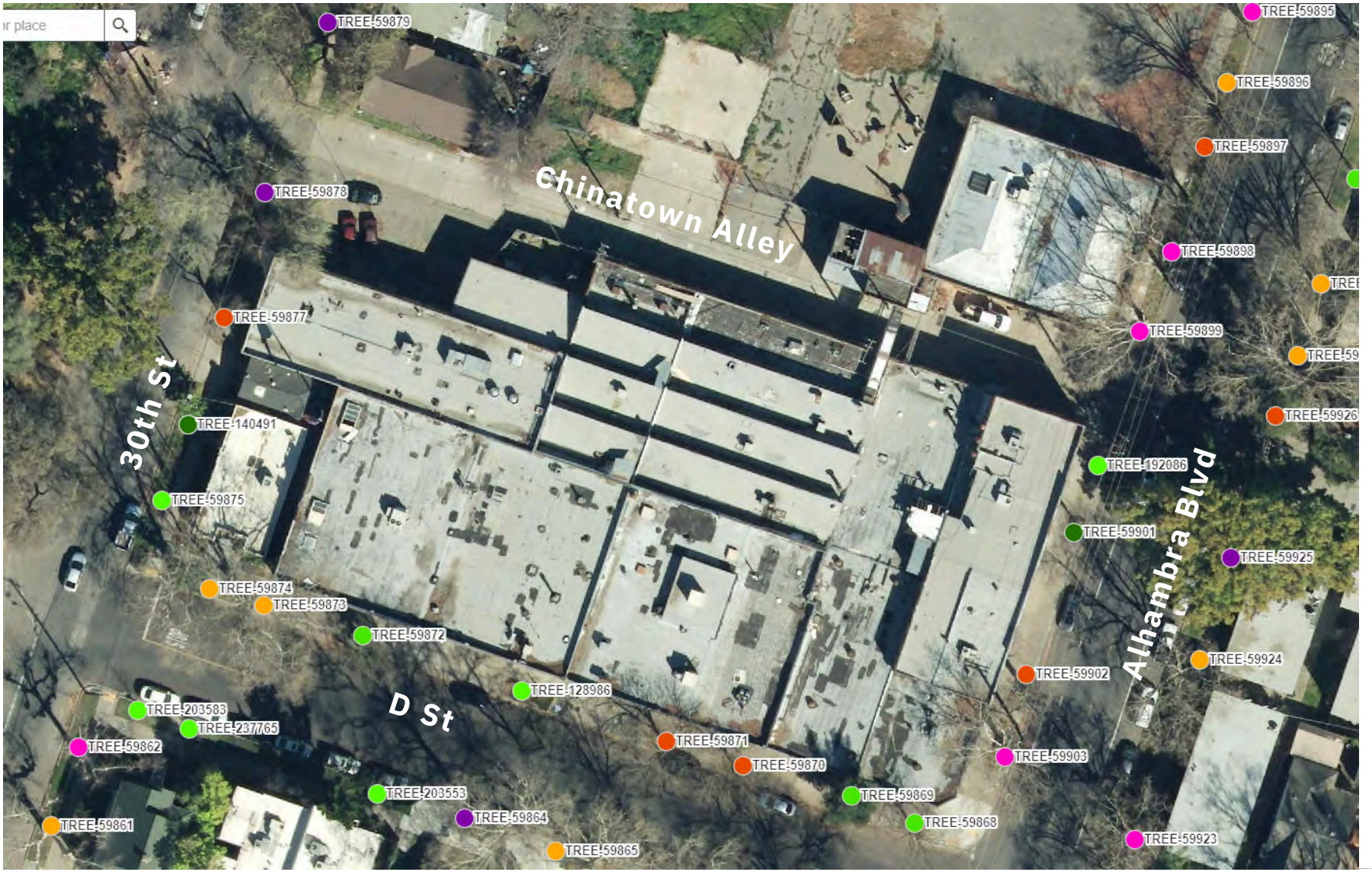
5/28/2024

Mary Ann's Bakery - South Portion

Sacramento, CA

Prepared for: HRGA

Map of Property Showing Approximate Tree Locations



Prepared by CalTLC

5/28/2024

APPENDIX 2 – TREE DATA

Tag #	Old Tag #	Protected By Code	Street Tree	Offsite	Species Common Name	Species Botanical Name	DSH (in.)	DSH Multi-Stem (in.)	Measured At (in.)	Canopy Radius (ft.)	Arborist Rating	Notes	Development Status	Pruning Requirement	Fee Waiver Requested
100		No		No	Fruiting pear	*Pyrus sp.*	5		54	7	666-Unprotected		Retain.	NA	
101		No		No	Pecan	*Carya illinoinensis*	6		54	8	3-Minor Problems	Growing between the existing residence and the concrete dry concrete alley surface for Chinatown Alley	Proposed for removal.	NA	
102		No		No	Monterey pine	*Pinus radiata*	11		54	13	3-Minor Problems	Leans west	Retain.	NA	
200		No		No	Italian cypress	*Cupressus sempervirens*	14		12	3	3-Minor Problems	Growing in the front yard approximately 3 feet away from the existing house. Height is 35 feet tall and conflicting with the adjacent plane tree.	Proposed for removal.	NA	
8950		No		No	Chinese hackberry	*Celtis sinensis*	12.5	5,6,7	36	15	1-Extreme Structure or Health Problems	Growing through chain-link fence, forks, 2 feet above grade grafted, 3 1/2 to 4 feet above grade one sided south	Proposed for removal.	NA	
8951		Yes		No	Chinese elm	*Ulmus parvifolia*	34	5,9,20,14	42	25	1-Extreme Structure or Health Problems	Growing through chain-link fence, forks, one to the 3 feet above grade, we attachments hissing wounds, where the stems have begun to	Proposed for removal.	NA	

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Tag #	Old Tag #	Protected By Code	Street Tree	Offsite	Species Common Name	Species Botanical Name	DSH (in.)	DSH Multi-Stem (in.)	Measured At (in.)	Canopy Radius (ft.)	Arborist Rating	Notes	Development Status	Pruning Requirement	Fee Waiver Requested
												engulf the top on the fence the largest stem bends at that point towards the west towards the house.			
8952		No		No	Tree-of-Heaven	*Ailanthus altissima*	17.5	11,12	54	17	2-Major Structure or health problems	Lower portion not visible, due to fence screening, forks, somewhere close to grade above average amount of dead branches of Collen wounds from pruning on the lower stems	Proposed for removal.	NA	
8953		No		No	Pecan	*Carya illinoinensis*	15		54	21	3-Minor Problems	Growing against the chain-link fence to the north, very upright, with limited lateral branching, some dead branches.	Proposed for removal.	NA	
8954		Yes		No	Pecan	*Carya illinoinensis*	29		54	28	3-Minor Problems	Growing against chain-link fence to the west, above average amount of dead branches	Proposed for removal.	NA	
8955		No		No	Glossy privet	*Ligustrum lucidum*	15		12	12	3-Minor Problems	Growing on the west side of the chain-link fence that separates the commercial from the residential we attachments.	Proposed for removal.	NA	
8956		No		No	Coast live oak	*Quercus agrifolia*	6		54	10	3-Minor Problems	Leans northeast	Proposed for removal.	NA	

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Tag #	Old Tag #	Protected By Code	Street Tree	Offsite	Species Common Name	Species Botanical Name	DSH (in.)	DSH Multi-Stem (in.)	Measured At (in.)	Canopy Radius (ft.)	Arborist Rating	Notes	Development Status	Pruning Requirement	Fee Waiver Requested
59868		Yes	Yes	Yes	Chinese pistache	*Pistacia chinensis*	14		54	16	3-Minor Problems	Above average amount of dead branches.	Retain.	Standard reduction "tip" prune.	
59869		Yes	Yes	Yes	Coast live oak	*Quercus agrifolia*	13		54	16	2- Major Structure or health problems	Reaction growth over sidewalk. Removal may be necessary.	Retain.	1x3", ~5% of canopy.	
59870		Yes	Yes	Yes	Zelkova	*Zelkova serrata*	15		54	17	3-Minor Problems	Above average amount of dead branches.	Retain.	Standard reduction "tip" prune.	
59871		Yes	Yes	Yes	Zelkova	*Zelkova serrata*	19		54	22	3-Minor Problems	Above average amount of dead branches.	Retain.	Standard reduction "tip" prune.	
59872		Yes	Yes	Yes	Chinese pistache	*Pistacia chinensis*	14		54	21	2- Major Structure or health problems	Ivy covering root collar/lower trunk, leans south. Remove ivy & reinspect. Diameter estimated due to ivy.	Retain.	None, leans away from buildings.	
59873		Yes	Yes	Yes	London plane tree	*Platanus × hispanica*	32		54	30	3-Minor Problems	Ivy covering root collar/lower trunk, leans south. Remove ivy & reinspect. Diameter estimated due to ivy.	Retain.	Remove branch or reduction prune - 3 to 4x4", <20% of canopy.	
59874		Yes	Yes	Yes	London plane tree	*Platanus × hispanica*	35		54	30	3-Minor Problems	Diameter estimated due to ivy.	Retain.	Remove branch or reduction prune - 3 to 4x4", <20% of canopy.	
59875		Yes	Yes	Yes	Eastern redbud	*Cercis canadensis*	5		54	6	3-Minor Problems		Retain.	None	

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Tag #	Old Tag #	Protected By Code	Street Tree	Offsite	Species Common Name	Species Botanical Name	DSH (in.)	DSH Multi-Stem (in.)	Measured At (in.)	Canopy Radius (ft.)	Arborist Rating	Notes	Development Status	Pruning Requirement	Fee Waiver Requested
59877		Yes	Yes	Yes	American sweetgum	*Liquidambar styraciflua*	14		54	16	2-Major Structure or health problems	Topped for utility line clearance, above average amount of dead branches.	Retain.	None	
59878		Yes	Yes	Yes	American elm	*Ulmus americana*	38		54	28	2-Major Structure or health problems	Topped and thru pruned for utility line clearance, over extended branches east and west, above average amount of dead branches.	Proposed for removal due to poor structure.	NA	Yes - due to poor condition and utility conflicts.
59879		Yes	Yes	Yes	American elm	*Ulmus americana*	38		54	31	2-Major Structure or health problems	Topped and thru pruned for utility line clearance, over extended branches east and west, above average amount of dead branches.	Proposed for removal.	NA	
59880		Yes	Yes	Yes	Red oak	*Quercus rubra*	14		54	17	2-Major Structure or health problems	Topped for utility line clearance, above average amount of dead branches.	Retain.	Minor reduction prune east side, minor encraochment for driveway R&R	
59881		Yes	Yes	Yes	Maidenhair tree	*Ginkgo biloba*	6		54	6	3-Minor Problems		Retain.	None	
59882		Yes	Yes	Yes	Maidenhair tree	*Ginkgo biloba*	5		54	6	3-Minor Problems		Retain.	None	
59886		Yes	Yes	Yes	London plane tree	*Platanus × hispanica*	18		54	21	2-Major Structure or health problems	Trunk wound south side 6' above grade with minor to moderate decay. One sided west.	Retain.	Remove branch or reduction prune - 1x6", ~5% of canopy.	

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Tag #	Old Tag #	Protected By Code	Street Tree	Offsite	Species Common Name	Species Botanical Name	DSH (in.)	DSH Multi-Stem (in.)	Measured At (in.)	Canopy Radius (ft.)	Arborist Rating	Notes	Development Status	Pruning Requirement	Fee Waiver Requested
59887		Yes	Yes	Yes	London plane tree	*Platanus × hispanica*	42		54	35	3-Minor Problems	Root collar lower trunk covered in ivy	Retain.	Remove branch or reduction prune - 1x28", 1x18", 1x12". ~35% to 45% of canopy.	
59888		Yes	Yes	Yes	Coast redwood	*Sequoia sempervirens*	9		54	12	2-Major Structure or health problems	Stump sprout from within the stump.	Proposed for removal due to poor structure.	NA	Yes - due to poor condition and utility conflicts.
59889		Yes	Yes	Yes	London plane tree	*Platanus × hispanica*	34		54	29	3-Minor Problems	One sided east. Root collar/lower trunk covered in ivy. Remove ivy & reinspect.	Retain.	Remove branch or reduction prune - 1x14", 1x6". ~15% to 20% of canopy.	
59890		Yes	Yes	Yes	Chinese pistache	*Pistacia chinensis*	22		54	25	3-Minor Problems	Girdling root over root south side.	Retain.	Reduction prune on building side by ~10% to 15%.	
59891		Yes	Yes	Yes	Zelkova	*Zelkova serrata*	31		54	28	3-Minor Problems	Codominant with inclusion, 13" stem east side with decay cavity. Remove 13" stem.	Retain.	Remove branch or reduction prune - 1x12", 2x9", ~20% of canopy.	
59892		Yes	Yes	Yes	London plane tree	*Platanus × hispanica*	40		54	38	3-Minor Problems	Above average amount of dead branches.	Retain.	Remove branch or reduction prune - 1x12" ~15% of canopy.	
59893		Yes	Yes	Yes	Zelkova	*Zelkova serrata*	24		54	25	3-Minor Problems	Above average amount of dead branches.	Retain.	Remove branch or reduction prune - 6x4" to 6"". ~20% of canopy.	
59894		Yes	Yes	Yes	Zelkova	*Zelkova serrata*	35		54	29	3-Minor Problems	Above average amount of dead branches.	Retain.	Remove branch or reduction prune - 1x12",	

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Tag #	Old Tag #	Protected By Code	Street Tree	Offsite	Species Common Name	Species Botanical Name	DSH (in.)	DSH Multi-Stem (in.)	Measured At (in.)	Canopy Radius (ft.)	Arborist Rating	Notes	Development Status	Pruning Requirement	Fee Waiver Requested
														3x4". ~20% of canopy.	
59895		Yes	Yes	Yes	Zelkova	*Zelkova serrata*	21		36	20	2-Major Structure or health problems	Weak attachments, above average amount of dead branches.	Retain.	Remove branch or reduction prune -6x4" to 5", ". ~20% of canopy.	
59896		Yes	Yes	Yes	Zelkova	*Zelkova serrata*	30		36	27	2-Major Structure or health problems	Topped/ thru pruned for utility line clearance, over extened branches east and west, above average amount of dead branches. Root damage evident.	Proposed for removal due to poor structure.	NA	Yes - due to poor condition and utility conflicts.
59897		Yes	Yes	Yes	London plane tree	*Platanus × hispanica*	18			16	2- Major Structure or health problems	Topped and thru pruned for utility line clearance, above average amount of dead branches.	Proposed for removal due to poor structure.	NA	Yes - due to poor condition and utility conflicts.
59898		Yes	Yes	Yes	London plane tree	*Platanus × hispanica*	25		54	28	2- Major Structure or health problems	Topped for utility line clearance, above average amount of dead branches.	Retain.	Reduction prune to clear building by 10% to 20% of length.	
59899		Yes	Yes	Yes	London plane tree	*Platanus × hispanica*	24		54	27	2- Major Structure or health problems	Topped for utility line clearance, above average amount of dead branches.	Retain.	Reduction prune to clear building by 10% to 20% of length.	
59901		Yes	Yes	Yes	Chinese pistache	*Pistacia chinensis*	7			8	3-Minor Problems	Ivy covering root collar/lower trunk.	Retain.	None	

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Tag #	Old Tag #	Protected By Code	Street Tree	Offsite	Species Common Name	Species Botanical Name	DSH (in.)	DSH Multi-Stem (in.)	Measured At (in.)	Canopy Radius (ft.)	Arborist Rating	Notes	Development Status	Pruning Requirement	Fee Waiver Requested
59902		Yes	Yes	Yes	London plane tree	*Platanus × hispanica*	14		54	10	2- Major Structure or health problems	Topped for utility line clearance, above average amount of dead branches.	Retain.	Remove branch or reduction prune - 2x8", 2x6"". ~25% of canopy.	
59903		Yes	Yes	Yes	London plane tree	*Platanus × hispanica*	20		54	16	2- Major Structure or health problems	Topped for utility line clearance, above average amount of dead branches.	Proposed for removal due to poor structure.	NA	Yes - due to poor condition and utility conflicts.
	D St														
128986		Yes	Yes	Yes	Scarlet oak	*Quercus coccinea*	4		54	6	3-Minor Problems		Retain.	None	
	30th St														
140491		Yes	Yes	Yes	Evergeen pear	*Pyrus kawakamii*	6		12		2-Major Structure or health problems	Forks at grade, weak attachments	Retain.	None	
	Alhambra Blvd														
192086		Yes	Yes	Yes	Chinese pistache	*Pistacia chinensis*	5		54	7	3-Minor Problems		Retain.	None	

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APPENDIX 3 – GENERAL PRACTICES FOR TREE PROTECTION

Definitions

Root zone: The roots of trees grow fairly close to the surface of the soil, and spread out in a radial direction from the trunk of tree. A general rule of thumb is that they spread 2 to 3 times the radius of the canopy, or 1 to 1 ½ times the height of the tree. It is generally accepted that disturbance to root zones should be kept as far as possible from the trunk of a tree.

Inner Bark: The bark on large valley oaks and coast live oaks is quite thick, usually 1" to 2". If the bark is knocked off a tree, the inner bark, or cambial region, is exposed or removed. The cambial zone is the area of tissue responsible for adding new layers to the tree each year, so by removing it, the tree can only grow new tissue from the edges of the wound. In addition, the wood of the tree is exposed to decay fungi, so the trunk present at the time of the injury becomes susceptible to decay. Tree protection measures require that no activities occur which can knock the bark off the trees.

Methods Used in Tree Protection:

No matter how detailed Tree Protection Measures are in the initial Arborist Report, they will not accomplish their stated purpose unless they are applied to individual trees and a Project Arborist is hired to oversee the construction. The Project Arborist should have the ability to enforce the Protection Measures. The Project Arborist should be hired as soon as possible to assist in design and to become familiar with the project. He must be able to read and understand the project drawings and interpret the specifications. He should also have the ability to cooperate with the contractor, incorporating the contractor's ideas on how to accomplish the protection measures, wherever possible. It is advisable for the Project Arborist to be present at the Pre-Bid tour of the site, to answer questions the contractors may have about Tree Protection Measures. This also lets the contractors know how important tree preservation is to the developer.

Root Protection Zone (RPZ): Since in most construction projects it is not possible to protect the entire root zone of a tree, a Root Protection Zone is established for each tree to be preserved. The minimum Root Protection Zone is the area underneath the tree's canopy (out to the dripline, or edge of the canopy), plus 10'. The Project Arborist must approve work within the RPZ.

Irrigate, Mulch: Prior to grading on the site near any tree, the area within the Tree Protection fence should be irrigated. The irrigation should percolate at least 24" into the soil. This should be done no less than 2 weeks prior to grading or other root disturbing activities. After irrigating, cover the RPZ with at least 12" of leaf and twig mulch. Such mulch can be obtained from chipping or grinding the limbs of any trees removed on the site. Acceptable mulches can be obtained from nurseries or other commercial sources. Fibrous or shredded redwood or cedar bark mulch shall not be used anywhere on site.

Fence: Fence around the Root Protection Zone and restrict activity therein to prevent soil compaction by vehicles, foot traffic or material storage. The fenced area shall be off limits to all construction equipment, unless there is express written notification provided by the Project Arborist, and impacts are discussed and mitigated prior to work commencing.

No storage or cleaning of equipment or materials, or parking of any equipment can take place within the fenced off area, known as the RPZ.

The fence should be highly visible, and stout enough to keep vehicles and other equipment out. I recommend the fence be made of orange plastic protective fencing, kept in place by t-posts set no farther apart than 6'.

In areas of intense impact, a 6' chain link fence is preferred.

In areas with many trees, the RPZ can be fenced as one unit, rather than separately for each tree.

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Where tree trunks are within 3' of the construction area, place 2" by 4" boards vertically against the tree trunks, even if fenced off. Hold the boards in place with wire. Do not nail them directly to the tree. The purpose of the boards is to protect the trunk, should any equipment stray into the RPZ.

Elevate Foliage: Where indicated, remove lower foliage from a tree to prevent limb breakage by equipment. Low foliage can usually be removed without harming the tree, unless more than 25% of the foliage is removed. Branches need to be removed at the anatomically correct location in order to prevent decay organisms from entering the trunk. For this reason, a contractor who is an ISA Certified Arborist should perform all pruning on protected trees.[3]

Expose and Cut Roots: Breaking roots with a backhoe, or crushing them with a grader, causes significant injury, which may subject the roots to decay. Ripping roots may cause them to splinter toward the base of the tree, creating much more injury than a clean cut would make. At any location where the root zone of a tree will be impacted by a trench or a cut (including a cut required for a fill and compaction), the roots shall be exposed with either a backhoe digging radially to the trunk, by hand digging, or by a hydraulic air spade, and then cut cleanly with a sharp instrument, such as chainsaw with a carbide chain. Once the roots are severed, the area behind the cut should be moistened and mulched. A root protection fence should also be erected to protect the remaining roots, if it is not already in place. Further grading or backhoe work required outside the established RPZ can then continue without further protection measures.

Protect Roots in Deeper Trenches: The location of utilities on the site can be very detrimental to trees. Design the project to use as few trenches as possible, and to keep them away from the major trees to be protected. Wherever possible, in areas where trenches will be very deep, consider boring under the roots of the trees, rather than digging the trench through the roots. This technique can be quite useful for utility trenches and pipelines.

Protect Roots in Small Trenches: After all construction is complete on a site, it is not unusual for the landscape contractor to come in and sever a large number of "preserved" roots during the installation of irrigation systems. The Project Arborist must therefore approve the landscape and irrigation plans. The irrigation system needs to be designed so the main lines are located outside the root zone of major trees, and the secondary lines are either laid on the surface (drip systems), or carefully dug with a hydraulic or air spade, and the flexible pipe fed underneath the major roots.

Design the irrigation system so it can slowly apply water (no more than ¼" to ½" of water per hour) over a longer period of time. This allows deep soaking of root zones. The system also needs to accommodate infrequent irrigation settings of once or twice a month, rather than several times a week.

Monitoring Tree Health During and After Construction: The Project Arborist should visit the site at least twice a month during construction to be certain the tree protection measures are being followed, to monitor the health of impacted trees, and make recommendations as to irrigation or other needs. After construction is complete, the arborist should monitor the site monthly for one year and make recommendations for care where needed. If longer term monitoring is required, the arborist should report this to the developer and the planning agency overseeing the project.

[3] International Society of Arboriculture (ISA), maintains a program of Certifying individuals. Each Certified Arborist has a number and must maintain continuing education credits to remain Certified.

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APPENDIX 4 – SITE PHOTOGRAPHS by Edwin E. Stirtz, March 11, 2024

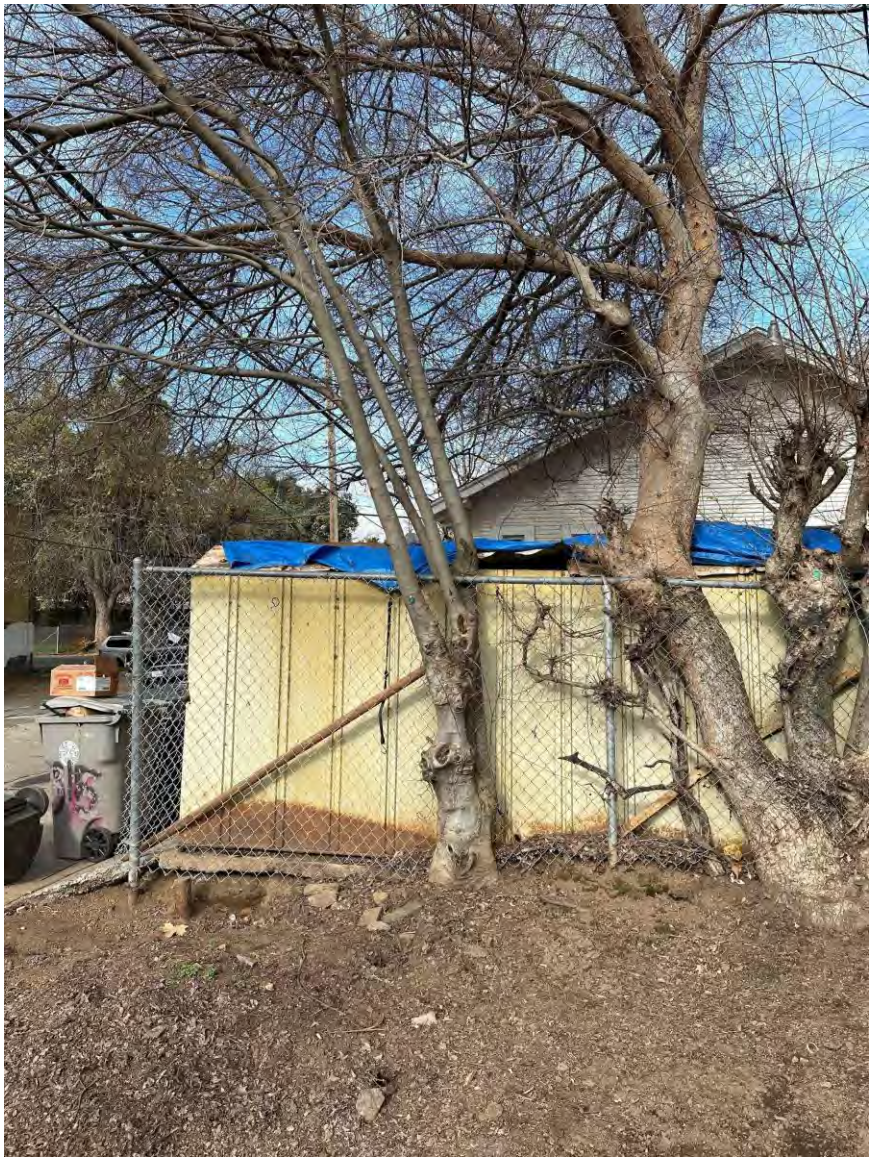

Photo #1, Shows Trees #8950 & #8951

Photo #2, Shows Tree #8952

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Photo #3, Shows Tree #8956

Photo #4, Shows Tree #8954

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Photo #5, Shows Tree #101

Photo #6, Shows C St., looking west & Tree #59894 in foreground

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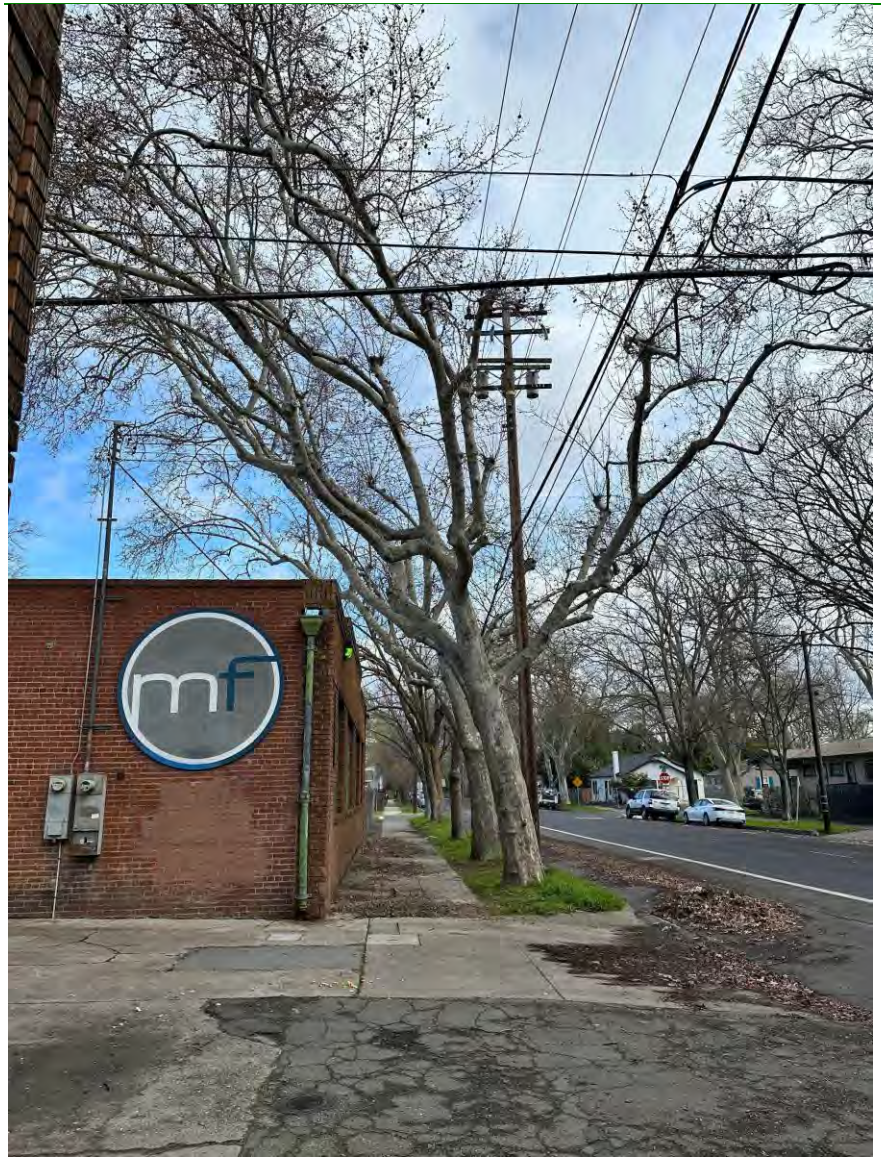

Photo #7, Shows Alhambra Blvd., view north from Chinatown Alley & Tree #59899 in front

Photo #8, Shows Alhambra Blvd., view south from Chinatown Alley & Tree #192086 in foreground

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Photo #9, Shows C St., looking west & Tree #59889 in front

Photo #10, Shows Tree #59888

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Photo #11, Shows Tree #59887 with typical ivy growth

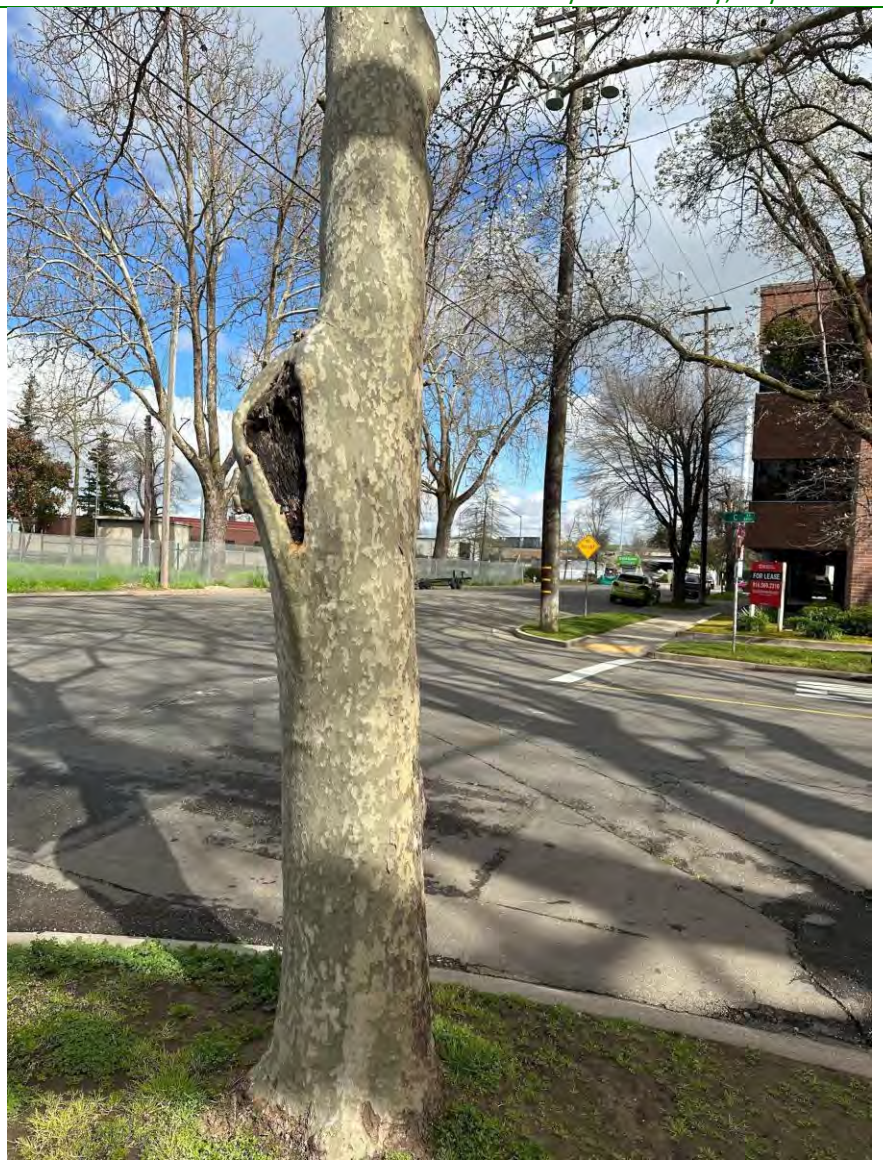

Photo #12, Shows Tree #59886 with cavity/decay

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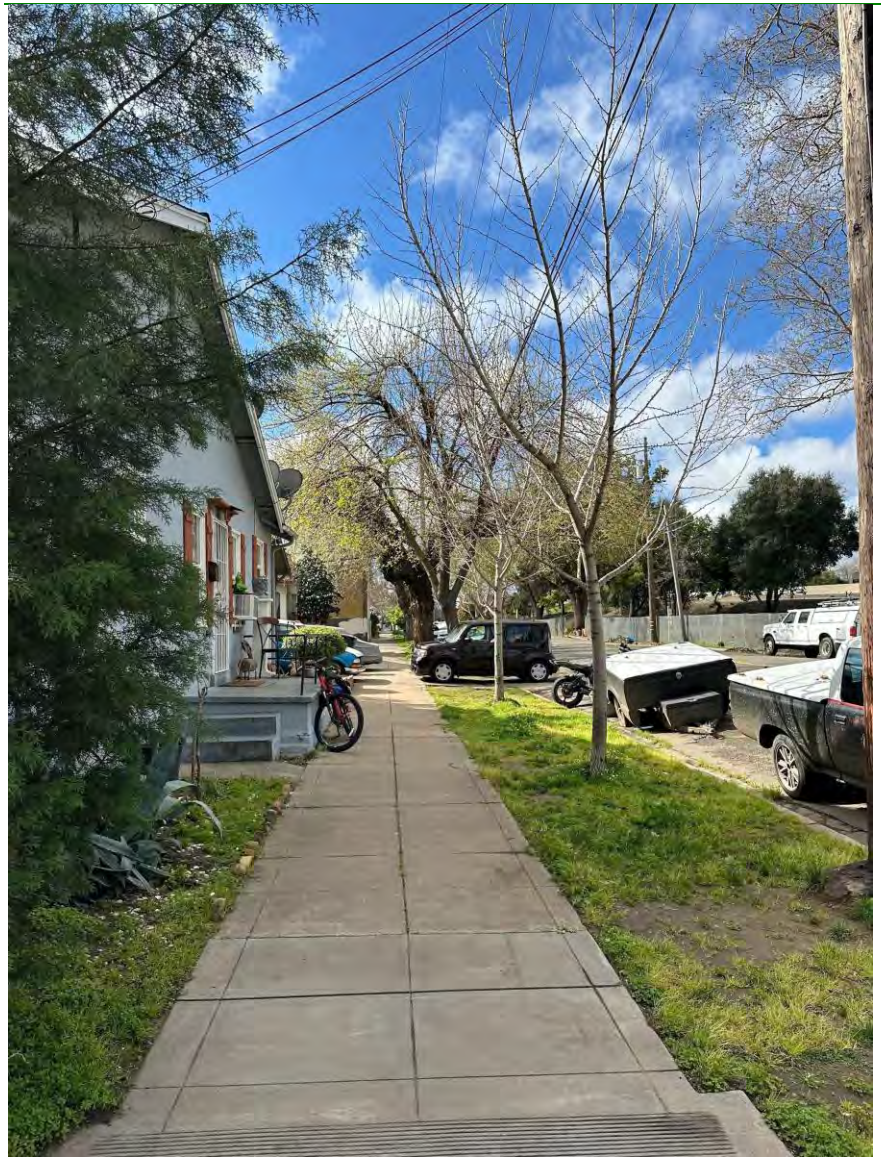

Photo #13, Shows 30th St., view south & Tree #59882 in foreground

Photo #14, Shows Tree #59872

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SITE PHOTOGRAPHS by Edwin E. Stirtz, June 17, 2024, Showing pruning cuts

Photo #15, Shows Tree #59894, with pruning cuts

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Photo #16, Shows Trees #59893 (left) & #59894 (right), with pruning cuts

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Photo #17, Shows Trees #59891 (back) & #59892 (front), with pruning cuts

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Photo #18, Shows Tree #59891, with pruning cuts

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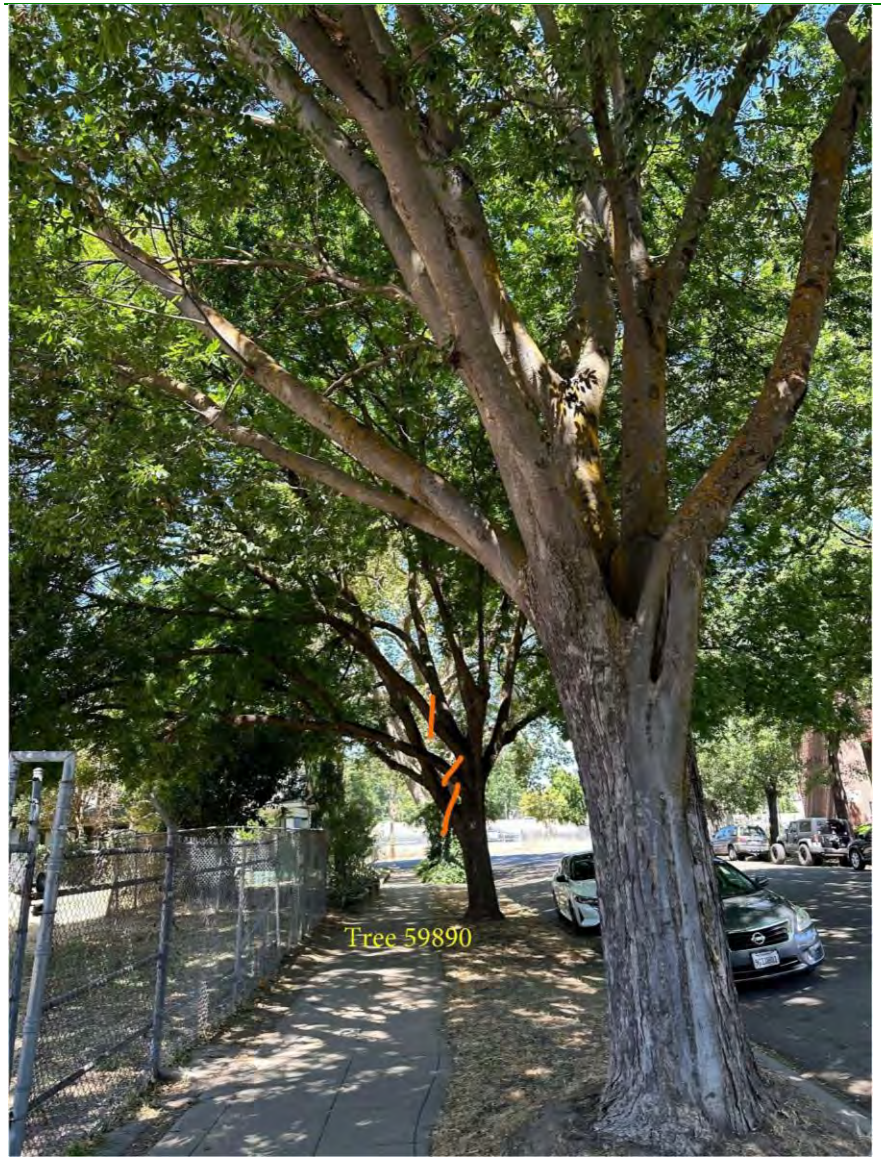

Photo #19, Shows Tree #59890, with pruning cuts

Photo #20, Shows Trees #59887 (back), #59888 (left) & #59889 (front/right), with pruning cuts

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Photo #21, Shows Tree #59886, with pruning cuts

Photo #22, Shows Tree #59895, with pruning cuts

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Photo #23, Shows Tree #59896, with pruning cuts

Photo #24, Shows Tree #59897, with pruning cuts

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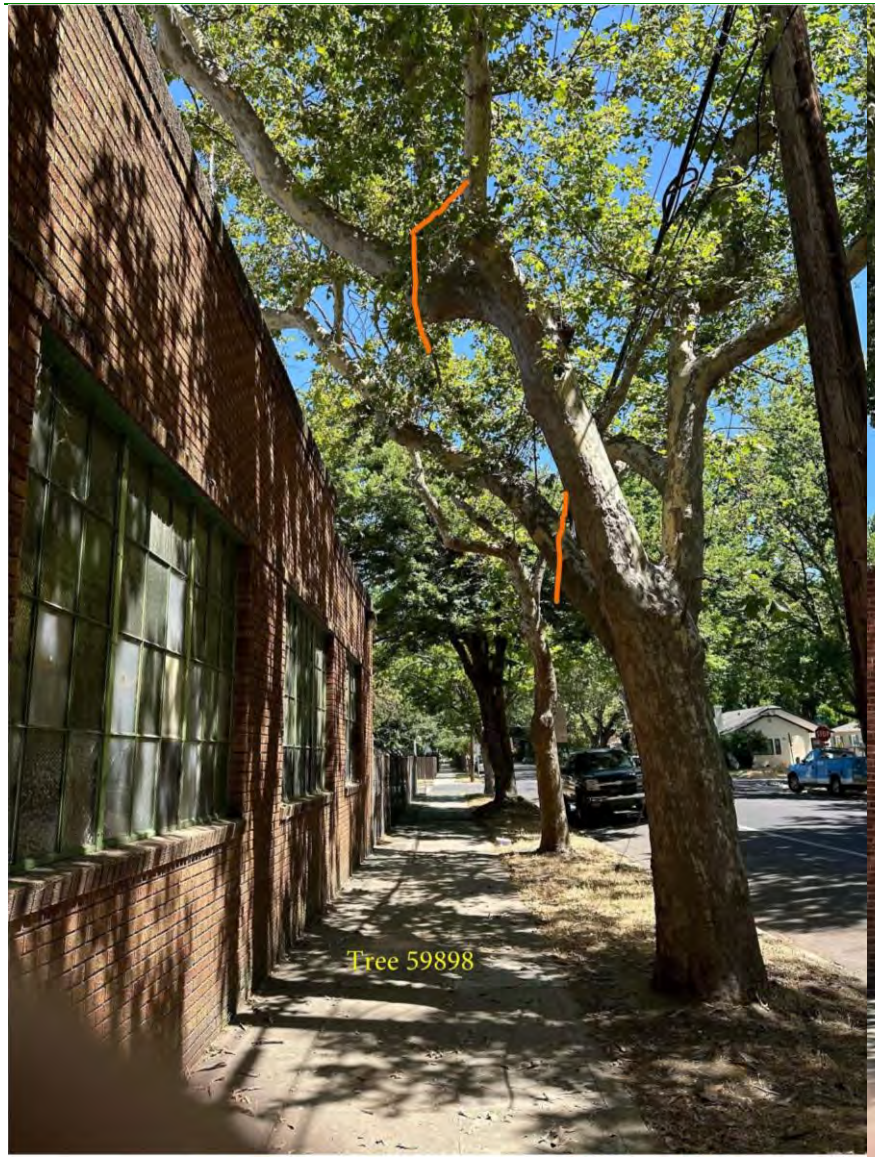

Photo #25, Shows Tree #59898, with pruning cuts

Photo #26, Shows Tree #59899, with pruning cuts

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City of SACRAMENTO
Community Development

300 Richards Blvd., 3rd Floor
Sacramento, CA 95811

Help Line: (916) 264-5011
planning@cityofsacramento.org

Appeal of Commission-Level Decision

City Code Section 17.812.060

I. Form Instructions

Overview: Any person dissatisfied with a Commission-level decision may appeal it to the City Council. Appeals must be filed within 10 calendar days of the decision.

Filing Instructions: All the following are required:

I. Complete Form: Fill all portions of this form with required information.

II. Submit Form:

- Online by emailing to planning@cityofsacramento.org; **OR**
- Deliver in-person to the Planning Counter at 300 Ricards Boulevard, 3rd floor.

III. Pay Fee. Once this form is submitted, city staff will generate an invoice. The appeal is not considered timely filled until the fee is paid. The fee may then be paid online on the Public Permit Portal or in-person at 300 Richards Blvd, 3rd floor.

- Appeal Fee is: $11,115 for Project Applicants; $1,045 for Third Party

How to Ask Questions: Please contact the planner assigned to the application being appealed, send an email to planning@cityofsacramento.org, or make an appointment to visit the Planning Counter in-person at 300 Richards Blvd, 3rd floor. To schedule an in-person visit, please use the Appointment Scheduling webpage.

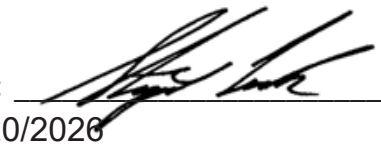
II. Appellant Information

Name: Citizens For Positive Growth & Preservation through counsel, Stephen R. Cook

Email: scook@brownrudnick.com

Phone Number: 949-752-7100

Mailing Address: Brown Rudnick LLP 4 Park Plaza, Suite 420 Irvine CA 92614

Signature: 

Date: 2/20/2026

III. Appeal Information

Project Name: Alhambra Redevelopment Project

Application Number: P24-007, File ID 2025-01286

Commission Decision Date: February 12, 2026

Grounds for Appeal (Attach Additional Pages, as Needed):

Please see the attached letter.

brownrudnick

STEPHEN R. COOK
949.752.7100
scook@brownrudnick.com

February 20, 2026

BY HAND DELIVERY AND E-MAIL

Sacramento City Council
c/o City of Sacramento
Planning and Design Commission
300 Richards Boulevard, 3rd Floor
Sacramento, CA 95811
planning@cityofsacramento.org

RE: Alhambra Redevelopment Project (P24-007) Appeal

Dear Members of the City Council and the Planning and Design Commission:

We submit this appeal on behalf of Citizens for Positive Growth & Preservation ("CPGP"), an unincorporated association whose members reside in or around the City of Sacramento. CPGP was created to advocate for positive growth in the City, and the preservation of safe, healthy, and livable residential neighborhoods—including older and historic park-centered neighborhoods—throughout the City.

CPGP hereby appeals the February 12, 2026 decision by the Planning and Design Commission (the "Commission") to approve the Alhambra Redevelopment Project (the "Project"). As explained below, the Commission's decision was erroneous because the Project is not exempt from the California Environmental Quality Act ("CEQA") under Public Resources Code section 21080.66, which applies only to projects that are "consistent with the applicable general plan and zoning ordinance." Pub. Res. Code § 21080.66(a)(4). Because the Project is *inconsistent* with applicable zoning laws and the City of Sacramento's General Plan, Section 21080.66 does not apply and the Project must be subjected to adequate CEQA review. In addition, the Commission's approval of a conditional use permit for the Project was improper pursuant to section 17.420.020 of the Sacramento City Code because: (i) the Project exceeds applicable base zoning height limits; and (ii) the Project is plainly out of scale with adjacent residential development. Therefore, the Project cannot be lawfully approved as proposed.

Section 17.420.020 of the Sacramento City Code, which governs development in the Alhambra Corridor Special Planning District ("Alhambra SPD") in which the Project is located, provides, in relevant part, as follows:

> General rule. Except as provided below, development located within 300 feet of a residential zone (measured from the street centerline) shall not exceed 35 feet in height. This restriction is intended to establish a buffer zone to protect residential

> neighborhoods from visual intrusion by new development that is out of scale with the adjacent residential neighborhood.
>
> Exception. The planning and design commission may approve a conditional use permit allowing additional height, provided that the height may not exceed the limits established by the applicable base zoning chapter. To approve the conditional use permit, the planning and design commission must find that the development will not be out of scale with the adjacent residential neighborhood. An example where the intent of the buffer zone is maintained while allowing additional height is a development incorporating design features or step-backs that reduce the walled effect on adjacent smaller-scaled residential development.

The Project is inconsistent with applicable zoning ordinances because it does not comply with the height restrictions governing development in the Alhambra SPD. Indeed, the Project—which is 68.17 feet tall—is nearly double the Alhambra SPD's 35-foot height limit. Nor does the Project qualify for a conditional use permit. As a preliminary matter, any such permit may not authorize height exceeding "the limits established by the applicable base zoning chapter." Sacramento City Code section 17.420.020. The maximum height allowed in the C-2 zone for buildings located next to R-1 and R-2 zones is 45 feet at a distance of 39 feet or less; 55 feet at a distance of 40-79 feet; and 65 feet at a distance of more than 80 feet. Even if the Project was located more than 80 feet from the nearest R-1 zone, at 68.17 feet tall, it exceeds the maximum base zoning height limit of 65 feet. Contrary to the staff report, the parapet may not be excluded from the building's total height when assessing its compliance with zoning laws. Because the parapet is part of the planned building, it must be considered when measuring the building's height. Therefore, the Project, as designed, exceeds even the base zone height limit, is inconsistent with applicable zoning laws, and is not exempt from CEQA under Public Resources Code section 21080.66.

In addition, even if the Project did not exceed base zone height limits, the Commission's approval of a conditional use permit to allow the Project to exceed the Alhambra SPD's 35-foot height limit was improper because the Project is plainly out of scale with adjacent residential development. The planned step-backs cannot cure this scale incompatibility when introducing a six-story, 68-foot building that occupies nearly an entire city block into a residential area. The Commission's approval of a conditional use permit was improper because there is no substantial evidence in the record that a project of this height and mass would not be out of scale with adjacent residential development even with the planned step-backs.

The Project is also not exempt from CEQA under Section 21080.66 because it is inconsistent with the City of Sacramento's General Plan in multiple respects. For example, the Project is inconsistent with Land Use Policy 6.4, which provides that "[t]he City shall recognize the patterns in existing neighborhoods by developing defined transitions between these neighborhoods and adjoining areas, and by requiring that new development, both private and public, consider the existing physical characteristics of buildings, streetscapes, open spaces, and urban form of the neighborhood in its design. Designs may be traditional or contemporary but should contribute to the livability of the neighborhood." The Project, which is nearly twice as tall as the 35-foot height limit governing construction in the Alhambra SPD, does not properly consider the existing physical characteristics of buildings in that residential preservation transition buffer zone.

In addition, the Project is inconsistent with General Plan Public Facilities Element 3.6, which provides, *inter alia*, that the City shall ensure that development in the Combined Sewer System ("CSS") area does not result in increased flooding or CSS outflows. Because the Project's impacts on the CSS—which is already over capacity—have not yet been adequately assessed, and the ability to mitigate those impacts has not been determined, it would be impossible for the Commission to conclude that the Project is consistent with the General Plan.

The Project is also inconsistent with the General Plan's Housing Element. As the staff report admits, the Project is located on two sites listed in the 2021-2029 RHNA Housing Element Sites Inventory, which anticipate 33 total units of lower income housing. Because the Project does not include any lower income housing units, it is inconsistent with the Housing Element.

The Project is also inconsistent with the General Plan for the reasons set forth in the May 22, 2025 letter from Nicole Sauviat Criste, which is attached hereto and incorporated by reference. For example, the Project is inconsistent with General Plan Land Use Policies 3.11, 4.1, and 4.6. In addition, it is impossible to determine, based on the information presented, whether the Project is compatible with General Plan Mobility elements 3.1, 3.2, 3.3, 4.1, 4.2, 4.3, and 4.4, or Public Facilities and Safety element 3.3. Therefore, the Project is not exempt from CEQA under Public Resources Code section 21080.66.

The Project is also ineligible for the exemption created by Public Resources Code section 21080.66 because of the presence of hazardous materials at the site. Public Resources Code section 21080.66 provides that "[t]he local government shall, as a condition of approval for the development, require the development proponent to complete a phase I environmental assessment, as defined in Section 78090 of the Health and Safety Code." Pub. Res. Code 21080.66(c)(1)(A). CPGP understands that a phase 1 environmental assessment was prepared by Geocon Consultants, Inc., which identified recognized environmental conditions. Where, as here, recognized environmental conditions are found, Section 21080.66 provides that "the development proponent shall complete a preliminary endangerment assessment, as defined in Section 78095 of the Health and Safety Code, prepared by an environmental assessor to determine the existence of any release of a hazardous substance on the site and to determine the potential for exposure of future occupants to significant health hazards from any nearby property or activity." Although the City has purportedly "conditioned the project to require the preparation of a Preliminary Endangerment Assessment as a condition of approval for the development," it does not appear that such an assessment has been prepared. The Project cannot be exempted from CEQA before an environmental assessor determines "the existence of any release of a hazardous substance on the site" and "the potential for exposure of future occupants to significant health hazards[,]" and a determination is made that such hazards can be mitigated to a level at which it would be safe for people to occupy the building.

Because the Project is not eligible for the exemption created by Section 21080.66, the Project must be subjected to full CEQA review. For the reasons set forth in the attached letter from Nicole Sauviat Criste, the Initial Study/Mitigated Negative Declaration released in or about April 2025 suffers from numerous fatal defects. Those defects include an insufficient project description and inadequate analyses of the Project's impacts on aesthetics, air quality, cultural resources, greenhouse gases, hydrology and water quality, land use and planning, transportation, and utilities and service systems.

As a result of these defects, the City of Sacramento's conclusion that "there is no substantial evidence that the project…will have a significant effect on the environment" is unsupported.

In fact, as detailed in the attached letter, there is substantial evidence that the Project may have multiple significant effects on the environment. As one example, the Project would cause significant aesthetic impacts by exceeding the default height limitations governing construction in the Alhambra SPD, which is intended to serve as a "buffer zone to protect residential neighborhoods from visual intrusion by new development that is out of scale with the adjacent residential neighborhood." As a second example, there is substantial evidence that the Project would cause significant impacts to cultural resources, including the Casa Loma Terrace neighborhood, which qualifies for listing in the Sacramento Register of Historic & Cultural Resources, the California Register of Historical Resources, and the National Register of Historic Places.

CEQA provides that an EIR must be prepared for any project that "may have a significant effect on the environment." Public Resources Code § 21151(a). "[I]f a lead agency is presented with a fair argument that a project may have a significant effect on the environment, the lead agency shall prepare an EIR even though it may also be presented with other substantial evidence that the project will not have a significant effect." CEQA Guidelines § 15064(f)(1). Accordingly, at minimum, an EIR for the Project must be prepared and circulated for public review and comment.

The Housing Accountability Act ("HAA") does not change the foregoing analysis. As a preliminary matter, the staff report contains virtually no analysis of the application of the HAA to this Project. In addition, Government Code section 65589.5(e) expressly provides that nothing in that section shall "be construed to relieve the local agency from making one or more of the findings required pursuant to Section 21081 of the Public Resources Code or otherwise complying with the California Environmental Quality Act (Division 13 (commencing with Section 21000) of the Public Resources Code)." Because the Project does not qualify for the exemption created by Public Resources Code section 21080.66, it cannot lawfully be approved without CEQA compliance. Moreover, the HAA does not prohibit local agencies from disapproving projects that are inconsistent with applicable plans and ordinances. *See* Government Code § 65589.5(j)(2)(A). Notwithstanding statements in the staff report that the Project proposes 332 units of "moderate-income housing," there is no substantial evidence in the record that the Project will provide housing for moderate income households as defined by the HAA. For example, there is no evidence in the record that the units at this Project will be subject to recorded deed restrictions, as required by Government Code section 65589.5(h)(3)(D). But even if the Project qualified as a housing development for moderate income households, the HAA does not require local agencies to approve such projects if they will have "a specific, adverse impact upon the public health or safety" that cannot feasibly be mitigated. Government Code § 65589.5(d)(2). Evidence in the record demonstrates that this Project would have multiple specific, adverse impacts upon public health and safety, including those adverse impacts identified in the attached letter from Nicole Sauviat Criste. For example, the Project would generate approximately 102,920 gallons of sewage per day, which would be discharged into the City's Combined Sewer System ("CSS") which is already over capacity. Although the Project is conditioned upon mitigating increases in sewer flow, there is no evidence in the record that this mitigation is feasible or sufficient. Notably, Government Code section 65589.5(d)(4) provides that a lack of adequate water or wastewater facilities can be grounds to disapprove a project. Likewise, the Project would generate approximately 960,000 additional vehicle trips per year on City streets that are already congested and dangerous.

Finally, to the extent that the Commission relied on CEQA Guidelines section 15183—which was cited in the Notice of Public Hearing for the Project but not discussed in the staff report—that section has no application to this Project. As discussed above and in the attached letter, there are project-specific significant effects that are peculiar to this Project and that have not been analyzed in any prior EIR or general plan with which the Project is consistent. Those effects must be studied and disclosed to the public through an adequate EIR.

For all the foregoing reasons, CPGP respectfully asks the City Council to reverse all Project approvals, including but not limited to the issuance of a conditional use permit, and to disapprove the Project in its entirety.

Very truly yours,

BROWN RUDNICK LLP

Stephen R. Cook

TERRA NOVA PLANNING & RESEARCH, INC.

May 22, 2025

Mr. Ron Bess
Associate Planner
City of Sacramento
Community Development Department
300 Richards Boulevard, 3rd Floor
Sacramento, CA 95811

RE: Initial Study Comments: Alhambra Redevelopment Project (P24-007)

Dear Mr. Bess:

We have been retained by Citizens for Positive Growth & Preservation (Citizens), an unincorporated association dedicated to the preservation of safe, healthy, and livable residential neighborhoods in the City to undertake a comprehensive review of the Initial Study (IS) prepared for the Alhambra Redevelopment Project (Project or Proposed Project). Citizens is concerned that the Proposed Project will substantially impact the existing surrounding neighborhood and East Sacramento. As part of our effort, we have reviewed the Initial Study and its Appendices, as well as plans and documents provided by the City on its website. The results of our comprehensive review and analysis of the Project document are provided below.

1. The Project Description is Incomplete and Inaccurate

It is critical to the CEQA process that any environmental document accurately and completely describe the project it analyzes, so that the public and decision-makers can understand the scope and intensity of development proposed. In this case, the Initial Study fails to provide sufficient information to allow a comprehensive understanding of the Project.

a) The description of the portions of the existing historic building, and what portions of it will be preserved, is overbroad and unquantified. Page 2 of the IS (and again at page 10) states that Project components "include retention of the overall building form and all four facades of 320 Alhambra Boulevard, as well as the contributing north, east, and south facades of 324 through 350 Alhambra Boulevard." First, to state that a six-story building is retaining the building form of a one-story building is ludicrous. Second, the Project Description fails to state that less than 25% of the facades of the building at 324 through 350 Alhambra Boulevard are being retained, and that the building at 320 Alhambra is the smallest, and least imposing structure on the site. Further, it is impossible, either in the IS or the Project plan set, to measure and ascertain the exact dimensions and percentage of loss, since no dimensions are provided in either document, and the applicant's architect has failed to provide a graphic scale, preventing anyone from being able to accurately measure the plans (May 13 Plan Set, Sheets 3 and 3.1). Given the historic significance of the building, an accurate representation of its planned destruction is critical to the analysis in the IS.
b) The building height is misrepresented and incorrect. The IS repeatedly states that the building has a "maximum height" of 62.75 feet. That figure understates the actual building height of 68'2", which includes the parapet. Further, the project description fails to disclose that the maximum height for "portions of buildings," regardless of whether they are above or below the roof, allowed in the C-2 zone for buildings located next to R-1 and R-2 zones is 45

feet at a distance of 39 feet or less; 55 feet at a distance of 40-79 feet; and 65 feet at a distance of more than 80 feet[1]. Again, because of the lack of dimensions on project plans, we estimate that Alhambra Boulevard is a 60 foot right of way. The nearest R-1 zone, therefore, is less than 79 feet from the proposed building, and the maximum building height of 55 feet should be disclosed. Finally, the description under "Conditional Use Permit" on page 21 is false: the maximum height adjacent to R-1 zones in the C-2 zone is measured from any "portion of a building," and must be characterized as 68'2" in order to accurately describe that the Project exceeds the height requirement of 65 feet. Therefore, the project description misleads the reader, and prevents an understanding of the actual provisions of the Municipal Code relating to building heights. Also see the discussion of the Alhambra Special Planning District (SPD) below.

c) Without providing substantial evidence, the project description asserts the Project's inclusion of replacement windows and doors, and the use of bricks would "maintain the historical character" of the existing buildings. Other than the writer's opinion, there is no support for such a conclusionary statement, and it does not belong in a project description.
d) The project description makes repeated directional errors. For example, "pedestrian gates west of the main outdoor courtyard" are actually east (page 13); the "southeastern section of the residential building" should be southwestern (page 14); and the small bike storage room is not east, but rather north of the interior courtyard.
e) The project description omits components of the Project. For example, private patios are described on the south side of the building, but the private patios on the north side and northwest corner are omitted; a single access point for the lounge on the east side of the building is described, but the access from the lobby and interior residences is omitted; as is the second access point for the fitness room. Access to the street is also only partially described. These are only some of the omissions which lead to an incomplete description of how the building will function and interact with the community.
f) The project description states that the Project meets the C-2-SPD requirement for open space by providing 40,852 square feet of open space, but there is no open space requirement in Municipal Code Section 17.216. What assumption was made to determine that the Project complies with open space standards in the zone?
g) Finally, and as further described under the discussion of the Air Quality section below, there is absolutely no discussion of the construction of the building, including in particular the removal of over 10,000 cubic yards of soil to create the subterranean garage and foundations that will support a 6-story, 68 foot tall building; the duration of construction; the equipment to be used and the staging areas and encroachments into neighboring streets that will be required to erect the building.

For all these reasons, the project description is inadequate, incomplete and insufficient, and must be rewritten to truly describe the Project in sufficient detail to allow an comprehensive understanding of the project.

2. <u>The Initial Study's Analysis of Impacts is Inadequate, Incorrect and Incomplete</u>

The following analysis is described based on the Initial Study impact analysis categories. First and foremost, we must note that the IS assumes that the approval of a Conditional Use Permit (CUP) for this Project's height exceedance is the mitigation for multiple impacts. That is an incorrect assumption. In this case, the CUP is an environmental impact, and its level of impact must be analyzed in the Initial Study.

[1] Section 17.216.720.B., Sacramento Municipal Code.

Aesthetics

The IS states that the Project is consistent with the General Plan because it is consistent with the RMU land use designation (page 24). That statement is misleading and inaccurate. The Land Use Element is much more complex than a land use designation. For example, General Plan LUP-3.11 states: "**Zoning Inconsistency**. Zoning is consistent with the General Plan if it is compatible with the objectives, policies, general land uses, and programs specified in the plan. (Cal. Gov't Code, § 65860(a)(2).) Zoning is compatible with the objectives, policies, general land uses, and programs specified in the plan if, considering all its aspects, it will further the objectives and policies of the general plan and not obstruct their attainment. (See also Sacramento City Code, § 17.104.100.C, as may be amended.)" In this case, the Project is not consistent with the Alhambra SPD, and therefore cannot be consistent with the General Plan. Also, General Plan LUP-4.1 states, in support of infill development such as that proposed by the Project: "**Transit-Supportive Development**. The City shall encourage increased residential and commercial development intensity within ½-mile of existing high-frequency bus stops and existing and planned light rail stations, bus rapid transit stations, and commuter rail stations to support more frequent, reliable transit service and vibrant, walkable neighborhoods." In this case, the Project is not within ½ mile of a high-frequency bus stop or rail station, bus rapid transit station or commuter rail station. General Plan LUP-4.6 is also clear:

"**Compatibility with Adjoining Uses**. The City shall ensure that the introduction of higher-intensity mixed-use development along major arterial corridors is compatible with adjacent land uses, particularly residential uses, by requiring features such as the following:

- Buildings set back from rear or side yard property lines adjoining single-unit dwelling residential uses;
- Building heights stepped back from sensitive adjoining uses to maintain appropriate transitions in scale and to minimize impacts to privacy and solar access;
- Landscaped off-street parking areas, loading areas, and service areas screened from adjacent residential areas to the degree feasible; or
- Lighting shielded from view and directed downward to minimize impacts on adjacent residential uses."

In this case, the proposed Project is not consistent with the General Plan, since it exceeds the requirements of the Alhambra SPD relating to height; does not provide setbacks from sensitive single unit development; and does not step back from sensitive adjacent uses. Contrary to the statement in the IS, since the Project is located in an area protected by the Alhambra SPD, the Project cannot have been "generally anticipated in the General Plan MEIR," since the Alhambra SPD existed at the time the MEIR was written, and its concepts and purpose are clearly reflected in General Plan policy. Therefore, the IS's conclusion that impacts related to scenic resources would not exceed those anticipated by the City is wrong, and impacts will be significant.

In addition, because the IS relies on the allowance that the Project is located in an urban area, the impacts associated with visual character must be analyzed on the basis that the project would or would not conflict with applicable zoning and other regulations governing scenic quality. In this case, the Project does not comply with General Plan Land Use policies relating to the preservation of existing neighborhoods when infill development is proposed, and does not comply with the 35-foot height limit imposed in the Alhambra SPD's residential buffer zone. The presence of a 68-foot building, which exceeds the 65 feet allowed (the IS continues to falsely claim that the building is 63 feet in height – see discussion of any part of a building being limited to 65 feet above), and the 35-foot height restriction in the Alhambra SPD cannot be found consistent with Zoning requirements. Furthermore, the IS relies on the granting of the CUP as a means by which the Project can be found consistent. That is also not allowable in this analysis. The CUP is a discretionary permit, which can only be granted if the findings for approval can be made by the Planning Commission. Here, the IS pre-supposes that these findings

can be made because the project will go through the Site Plan and Design Review process, without providing any substantial evidence that the CUP will have no impact on zoning requirements. Without a thorough analysis of the impacts of the CUP on the surrounding single family neighborhood and the purpose of the Alhambra SPD's residential buffer zone, the conclusion must be that the impacts associated with Zoning consistency will be significant.

Finally, as it relates to the discussion of light and glare, the IS falsely states that because the site is currently developed, it experiences light and glare from this existing development. That statement is false. The site is an abandoned complex of buildings which are not lighted, and which do not currently cast light from windows or on-site traffic. The windows are covered in plywood, which eliminates the potential for glare. The IS further states that because the Project must shield its lighting, it will not have significant lighting impacts. However, the IS provides no substantial evidence that the Project's lighting will indeed comply, and since no photometric plan is included in either the IS or the building plans, no such evidence exists. Finally, the IS cites the Citywide Single-Unit Dwelling and Duplex Dwelling Design Guidelines in support of the Project's requirement to limit lighting. What the IS fails to disclose is that the Project is not subject to the requirements of these Guidelines, because it is neither a single family home nor a duplex. The IS fails to demonstrate that the Project will have less than significant impact on lighting and glare, and must be rewritten to analyze and quantify the impacts correctly.

Air Quality

We undertook a comprehensive review of both the IS and the CalEEMod Appendix for the Project, and found serious flaws. First, the IS describes only that construction will last 2.5 years, and that there will be 68,824 square feet of building demolished. There is no description of the time or equipment assumed for site preparation and demolition, grading, building construction, paving, or architectural coating. There is no description of the location of the disposal site for demolition, to substantiate the CalEEMod default of 20 miles used in the model. And most significantly, there is no description of the amount of soil export, the number of haul trips, or the distance of the barrow site for disposal of this soil export. All of this information is needed to correctly assess the air quality impacts of the Project.

In our analysis of the CalEEMod outputs, we found that there are the correct number of haul trips assumed for the demolition of 68,824 square feet of building. However, the CalEEMod model includes absolutely no soil export. This is physically impossible for a site where a garage will be dug 10 feet underground, and superpads or piles will be required to support a 6 story building. Based on our analysis of the Project plan set (which once again is not properly dimensioned), we estimate that the Project will excavate, at a minimum, an area of 25,000 square feet to a depth of at least 10 feet. The Project proposes a finished floor at 20.6 feet, and the site's existing topography is 20 to 22 feet, so none of the excavated soil is planned for redistribution on the site. This results in 9,259 cubic yards of soil that will need to be removed from the site. The amount is likely to be higher, when foundations and/or piles are added for the building. These 9,259 cubic yards of soil will need to be hauled off-site. A dump truck holds 16 cubic yards of material. Therefore, the Project will require 579 one way trips (1,157 trips to and from the disposal site) over an unknown period of time by multi-axle, diesel fueled trucks operating immediately adjacent to sensitive receptors. However, the CalEEMod assumptions, Section 5.3.1 show 0 hauling vehicles during the Grading phase, when soil export would occur. The IS therefore, significantly underestimates the air quality impacts associated with excavation of the garage on the site, and the CalEEMod model must be rerun to assure a correct quantification of the air quality emissions that will impact this highly developed single family neighborhood.

The discussion of TACs and DPM is also incorrect. First, it does not account for the high concentration of haul trucks waiting to be filled adjacent to sensitive single family homes during the Grading phase, as described above. Second, it does not consider, or even mention, the location of the Project immediately adjacent to the freeway corridor. The residents of the Project will be exposed to high concentrations of

DPM emanating from the freeway, located less than 200 feet to the west of the Project. The professional standard by which air resources boards require operational Health Risk Assessments (HRA) is for projects located within 500 feet of a freeway. In this case, the Project residents will be located much closer, but the IS did not consider their exposure, or prepare an operational HRA to demonstrate what the long-term exposure to TACs and DPMs will do to residents' cancer risk. Such an omission is unacceptable, and does not allow decision makers to consider that they are potentially placing future City residents in a position where their risk for cancer will exponentially increase. The IS must be rewritten to include an operational HRA.

Cultural Resources

The IS limits its discussion of historic resource impacts to the structures associated with the Puerta Sausage Factory, and whether the proposed Project would impact these structures. The analysis, however, ignores the context and neighborhood in which the Project is located, and limited itself to only the Project site. This is insufficient to analyze the impacts of this Project.

In order to assess the sufficiency of the technical report contained in Appendix A of the IS, Citizens commissioned Historic Environment Consultants (HEC) to review the report and assess its findings (Attachment 1). HEC's analysis shows that the study prepared for the Project is too narrow in scope to address the impacts of the Project on historic resources.

CEQA guidelines state that the term "historical resources" applies to any such resources listed in or determined to be eligible for listing in the California Register of Historical Resources, included in a local register of historical resources, or determined to be historically significant by the lead agency (Title 14 CCR §15064.5(a)(1)-(3)). Regarding the proper criteria for the evaluation of historical significance, CEQA guidelines mandate that "generally a resource shall be considered by the lead agency to be 'historically significant' if the resource meets the criteria for listing on the California Register of Historical Resources" (Title 14 CCR §15064.5(a)(3)). A resource may be listed in the California Register if it meets any of the following criteria:

(1) Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.
(2) Is associated with the lives of persons important in our past.
(3) Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values.
(4) Has yielded, or may be likely to yield, information important in prehistory or history. (PRC §5024.1(c))

It is important to note that the requirements apply equally to areas eligible for listing as those that are listed.

In this case, as clearly demonstrated in Attachment 1, the Project is located in an area which qualifies for listing in the Sacramento Register of Historic & Cultural Resources, the California Register and the National Register of Historic Places. The analysis conducted by HEC found that the area bounded by B Street, E Street, Alhambra Boulevard and 33rd Street holds a high concentration of homes (84%) built before 1930 in the Craftsman and Period Revival styles. The area, identified as Casa Loma Terrace when it was developed, represents an historic neighborhood in Sacramento. The Casa Loma Terrace neighborhood qualifies for local listing under criterion (2), insofar as the area is clearly associated with its developer, Daniel Carmichael, who served two terms as Mayor of Sacramento; and with John Guisto, a major contributor to agricultural activities in the Sacramento region, who lived in the neighborhood from 1893 to 1962 in a 1893 Queen Ann home which still exists in the neighborhood. The neighborhood also qualifies under criterion (3), because Casa Loma Terrace's homes "embody the

distinctive characteristics of Craftsman and Period Revival homes built before 1930." Because Casa Loma Terrace is eligible for listing in the City's register, the California Register and the National Register of Historic Places, CEQA requires an analysis of the impacts of the Project on this neighborhood, and the IS cannot limit its analysis to the structures on the Project site. As described by HEC, the Project is incompatible with the neighborhood, and will introduce an urban project into an historic district of Sacramento. This represents a significant impact that has not been analyzed in the IS. As a result, the document is incomplete, and must be rewritten.

We also note that the analysis in the IS and in Appendix A relies heavily on the "character defining features" of the existing buildings to describe how the Project will be historically compatible (brick construction, multi-panel windows, for example). We find it incomprehensible that the character defining features of "one-story massing" and "one- and two-story massing" identified in the report are ignored in the IS. The IS asserts that the Project will not impact historic resources because it "would specifically retain and incorporate the character-defining features identified in the HRE…" It fails to note or analyze, however, how only some of those character-defining features have been incorporated, while others are ignored. The analysis is clearly written to accommodate the Project, not to provide an impartial study of the impacts to a historic resource.

Finally, although the IS identifies a potential impact associated with buried archaeological resources, Mitigation Measure V-1 is unenforceable and therefore infeasible. The measure calls for the immediate cessation of construction activities if cultural resources are uncovered during construction. However, without either a professional monitor on-site, or a thorough and comprehensive workers' education program, it is almost certain that the operators of the bulldozers, loaders and graders will have no knowledge or understanding of what a cultural resource could look like. As a result, cultural resources, if they occur on the site, will be obliterated by grading personnel. The same is true of Mitigation Measure VII-3, which parrots the cultural resource measure – construction personnel will not know what a paleontological resource looks like, and the measure is infeasible. Therefore, impacts to cultural and paleontological resources remain significant, and have not been mitigated to less than significant levels.

Greenhouse Gases

As described at length in the discussion of Air Quality impacts above, the Project's CalEEMod analysis fails to incorporate at least 1,157 trips two and from the disposal site by haul trucks for soil export. The GHGs created by these trucks are substantial, and given the Project's generation of 861 MTCO2e, only 239 MCTO2e below the SMAQMD threshold, may be significant if correctly analyzed. Because of this deficiency, it is not possible to determine whether the Project will have significant GHG construction impacts, and the IS must be rewritten when the CalEEMod model has been re-run.

In addition, the analysis of CAAP compliance in the IS is wholly insufficient. The IS refers to "various measures related to new development" that would apply to the Project, but addresses none of them. Instead, the IS admits that its analysis is for "general consistency" (page 68) and not for Project specific analysis. A proper analysis of CAAP measures is required to provide substantial evidence that the Project will not impact GHG reduction efforts in the City, and the Project's need to be all-electric, which is the only measure mentioned in the IS, is insufficient to support such a conclusion. Finally, the IS again relies on the Project having been considered in the General Plan MEIR for its significance determination. As described above, if the General Plan MEIR considered the Project at all, it considered a three-story structure on this site, and the Project proposes twice that size. By extension, the Project, therefore, will generate twice the operational long term GHGs as were considered in the General Plan MEIR, and there is no evidence that those emissions would be less than significant.

Hydrology & Water Quality

The discussion of stormwater management in the IS is wholly inadequate. The Project occurs within the City's Combined Sewer System (CSS), where both stormwater and sanitary sewage is discharged into the same pipe. The CSS is over-capacity, and as a result the City has partially implemented facilities to offset its deficiencies, including a sewer vault beneath McKinley Park. The discussion contained in the IS does not quantify the stormwater flows associated with the Project, which will necessarily increase with the addition of large expanses of roof and the complete covering of the site with impervious surfaces, nor does it consider whether the CSS has current capacity to accommodate these flows. This is critical in this case because if there is not sufficient capacity, which is known to be the case, the Project will impact waste discharge requirements, by increasing the potential for contaminated overflow in City streets during storm events. The Project's compliance with City requirements, used in the IS to solve all problems, does not demonstrate whether the Project will have an impact, or whether that impact can be mitigated. The standard quoted specifically states "drainage impacts resulting from the improvement or development shall be fully mitigated." There is no analysis or mitigation provided in the IS. It simply defers analysis and mitigation. This is not allowed under CEQA, and must be addressed. Please also see discussion under Utilities, below.

As it relates to water demand and supply, the IS once again does not quantify the Project's water demand, or provide substantial evidence that the City has sufficient water supply under normal, single dry or multiple dry years. Instead, the IS once again asserts that the Project's consistency with the General Plan assures that no impact will occur. As described above, the General Plan MEIR would have considered a project half the size of the proposed Project, since the Alhambra SPD would apply to this site. The assumption made by the IS, without supporting facts, cannot be used to declare the impacts less than significant. A proper, quantified analysis of Project impacts to water resources must be prepared.

Land Use & Planning

The analysis contained in the IS relating to the Alhambra SPD is flawed and incorrect. The analysis concludes that the Project qualifies for an exclusion to the height limitation of 35 feet by using incorrect information. As described above, the height limits associated with the C-2 zone apply to any "portion of a building." In this case, the building is 68'2', and exceeds the maximum allowed height of 55 feet within 40-79 feet of a R-1 zone. Even if the City were to argue that the building is 80 feet or more from the R-1 zone, the limitation would still be 65 feet for any "portion of the building," not for the roof and excluding the parapet. The parapet is a "portion of the building." The Project therefore exceeds the City's own Zoning standards. The IS does not address specific text in 17.420.020 that has direct applicability to the Project, including:

17.420.020.B.1.: General rule. Except as provided below, development located within 300 feet of a residential zone (measured from the street centerline) shall not exceed 35 feet in height. This restriction is intended to establish a buffer zone to protect residential neighborhoods from visual intrusion by new development that is out of scale with the adjacent residential neighborhood. (emphasis added)

17.420.020.B.2.: Exception. The planning and design commission may approve a conditional use permit allowing additional height, provided that the height may not exceed the limits established by the applicable base zoning chapter. To approve the conditional use permit, the planning and design commission must find that the development will not be out of scale with the adjacent residential neighborhood. An example where the intent of the buffer zone is maintained while allowing additional height is a development incorporating design features or step-backs that reduce the walled effect on adjacent smaller-scaled residential development. (emphasis added)

In this case, the building exceeds the height allowed in the base zone, because the building exceeds 65 feet (where the roof is located is irrelevant, per 17.216.720). It therefore does not even qualify for an exception. Further, the building rises straight up from the east property line on Alhambra Boulevard, with only a 10 foot step-back at the 3rd level, which will be imperceptible at the street level. That extends through the 4th level, to a height of 43'4", where a further unquantified step-back occurs for the 5th level. Given that this step-back occurs 45 feet off the ground, it will also not be perceptible from the residences to the east, in the residential buffer zone. None of this analysis is included in the IS. It simply concludes that the Project qualifies for the CUP, and that there is no conflict with Zoning. Further, as described above, the Project is inconsistent with General Plan Land Use Policy 3.11 and 4.6, and thus inconsistent with the General Plan. Clearly, as described here, the impacts of the Project on General Plan Policy and Zoning requirements are significant and unmitigated.

Transportation

Again, as stated above, the IS relies on the unfounded assumption that the Project would have been analyzed in the General Plan MEIR because it is consistent with the land use designation. Again, as repeatedly described above, we challenge that assumption. The Project would have been limited to 35 feet, or half its current size, and would have contained half the units currently proposed. Therefore, the trip generation for the Project would have been half of the 2,637 weekday trips, 3,300 Saturday trips, and 2,558 Sunday trips identified for the Project, and only mentioned in Appendix B, the CalEEMod model runs. Although it is clear that CEQA no longer requires trip generation as a metric, the City is still obligated to consider whether the Project is consistent with General Plan policy. In this regard, at a minimum, the IS must analyze whether the Project will impact any of the General Plan's policies relating to street design and safety, including M-3.1 through M-3.3, and M-4.1 through M-4.4. In this case, the Project will impact local streets, decrease traffic safety, and not mitigate its impacts through traffic calming, as is required in the General Plan. Therefore, the analysis in the IS is insufficient and must be revised.

Finally, the IS does not address the fact that the Project is described as an infill mixed use project throughout the document, but that in fact it is not located within ½ mile of either a rapid transit stop or a rail station. This inconsistency with General Plan policy is not addressed in the IS, making the discussion of alternative transportation insufficient.

Utilities & Service Systems

The discussion of water supply is inadequate, as discussed under the Hydrology & Water Quality section above. The Project is not consistent with the General Plan, would generate twice the development allowed on the site under the Alhambra SPD, and water demand and supply must be quantified.

The discussion of wastewater and sanitary sewer is also insufficient, based on the Project's location within the CSS. According to the City's own estimates, residential units generate 310 gallons of sewage per unit per day. On this basis, the Project will generate 102,920 gallons of sewage per day, to be discharged into an existing 8" CSS pipe which is already over capacity (see Hydrology & Water Resources discussion above). The IS, however, does not consider any of these facts in determining the Project's impacts on the CSS. In this case, the over-capacity conditions require, at a minimum, that the Project construct an on-site sewer vault, in order to be able to control its outflow, particularly during storm events. This option is included in the City's own plans for CSS management, but never discussed in the IS. Further, there is no evidence provided to quantify the size of that facility: that the Project has been designed to include an on-site sewer vault; that the site and Project can accommodate such a facility; or that such a facility would be sufficient to reduce the impacts of the Project on the CSS. The only statement made in the IS is that the Project was considered in the General Plan MEIR, and that its

impacts must have been covered in that document. The IS does not address, however, two critical General Plan policies as they apply to the Project (emphasis added):

Policy PFS-3.3: Development Impacts. Through the development review process, including through development impact fees and offsite improvements constructed by new development, the City shall ensure that adequate public utilities and services are available to serve new development.

Policy PFS-3.6: Combined Sewer System Rehabilitation and Improvements. In keeping with its Combined Sewer System (CSS) Long Term Control Plan (LTCP), the City shall continue to rehabilitate and improve the CSS to decrease flooding, CSS outflows, and Combined System Overflows (CSOs). Through these improvements and requirements for new development, the City shall also ensure that development in the CSS area does not result in increased flooding, CSS outflows or CSOs or reduce the overall percentage of flow routed to the Sacramento River Water Treatment Plant (SRWTP).

There is no substantial evidence provided in the IS that the Project has been designed to comply with these policies, and no evidence that it will not increase flooding or CSS outflows. The IS must be rewritten to address these impacts.

3. There is Substantial Evidence that the Impacts of the Project are Significant and Unmitigated

As described above, there is substantial evidence that the City has not mitigated the impacts of the proposed Project, and that significant impacts will occur. When presented with substantial evidence, the City is obligated to prepare an Environmental Impact Report (EIR). At a minimum, the City must require that the deficiencies in the analysis be cured, that an EIR be prepared, and that the EIR be circulated for public review. In addition, unless the City can provide adequate mitigation, including a reduction in the height and intensity of the proposed building, the City may need to consider and prepare findings and a statement of overriding considerations for significant and unmitigable impacts of the Project.

Sincerely,

Nicole Sauviat Criste
Principal

Attachment 1

Historic Environment Consultants

Preliminary evaluation of the historic significance of the Casa Loma Terrace neighborhood

Historic Environment Consultants May 20, 2025

This report is partly in response to the report produced by Groundwork Preservation LLC for Demas Enterprises on September 27, 2024. The project proposes to put a 6-story apartment complex, covering nearly an entire city block, and having 332 rental units. However, this report also seeks to take a much deeper look at the historic significance of the surrounding neighborhood, primarily Casa Loma Terrace and a few other properties.

This preliminary survey identified an Area of Potential Effect (APE) that needs to be studied to determine what effect this project will have on adjacent historic resources.

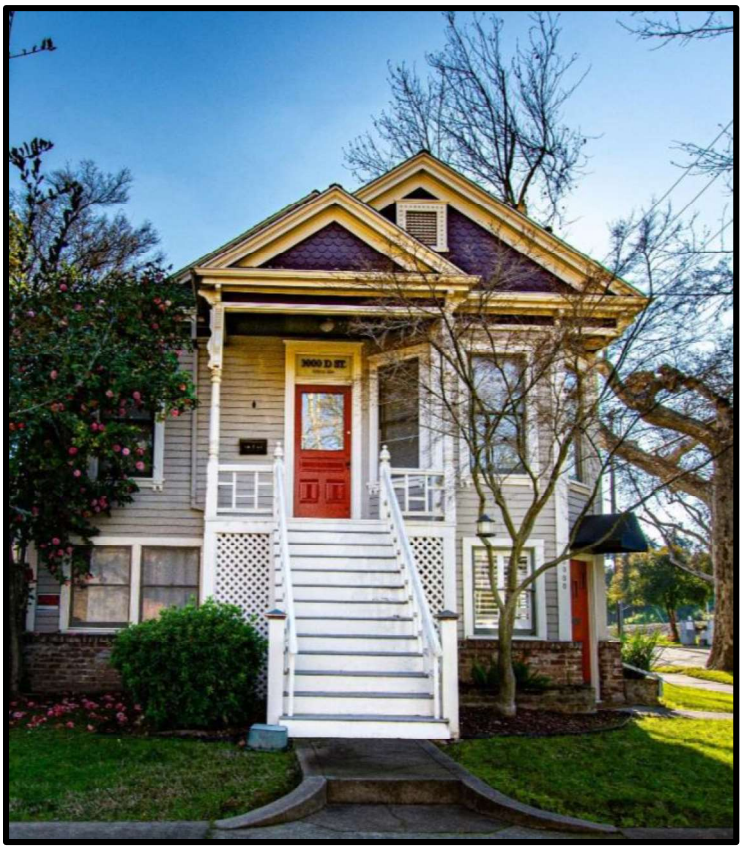


Figure 1 – 403 30th Street. Photo by Don Cox (HEC).

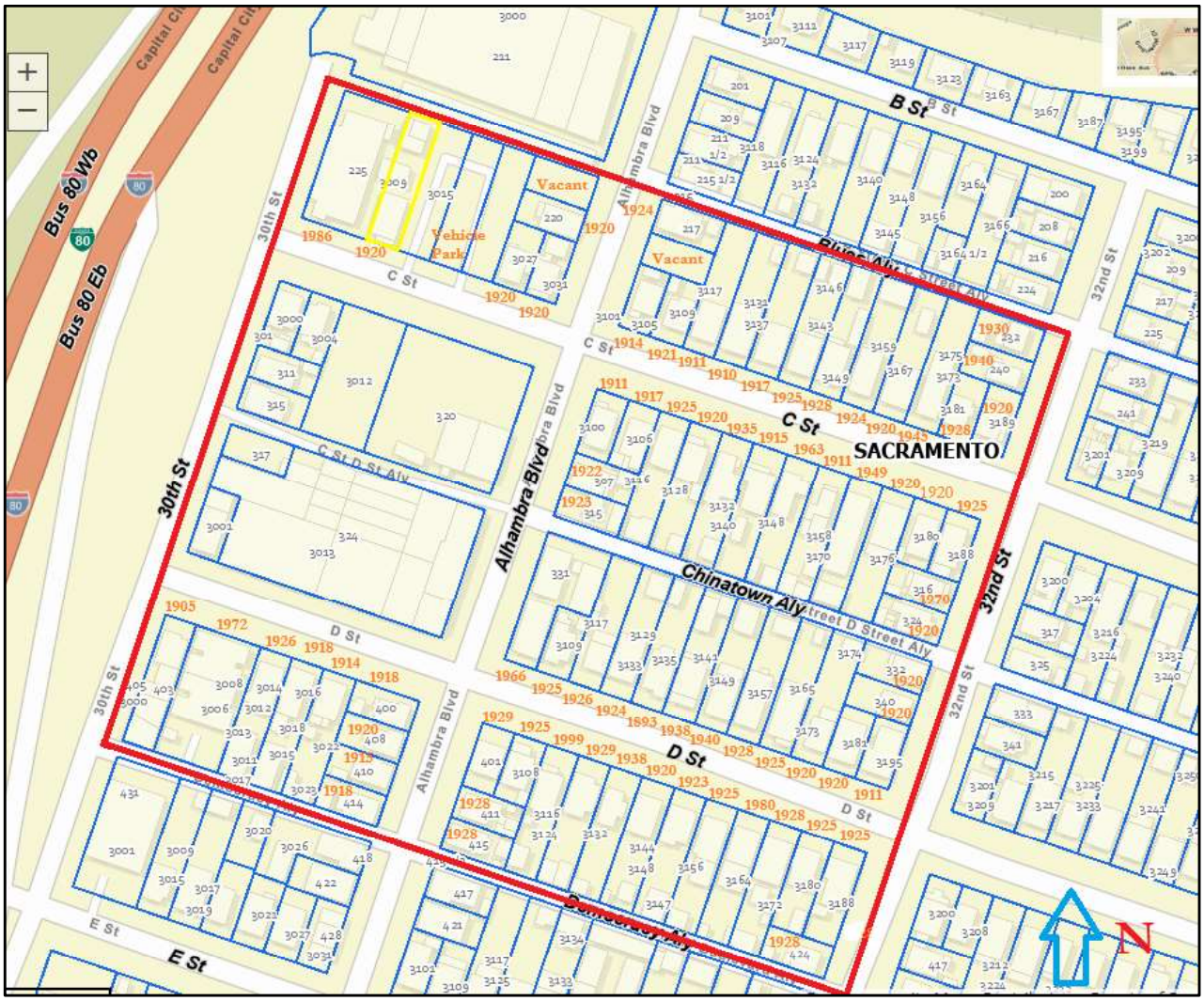


Figure 2 - Area of Potential Effect - Assessor's Map, data provided by HEC

What this preliminary survey intends to show is that this area (the APE) and perhaps all of Casa Loma Terrace is an historic resource.

This report also suggests what is being proposed as "mitigation" for loss of the Pureta Sausage Factory and Mary Ann's Bakery is inadequate.

Casa Loma Terrace

Figure - A handful on Queen Anne houses are mixed in with the later craftsman and period revival cottages. Photo by Don Cox (HEC).

The Casa Loma Terrace development encompasses all the properties from B to E Street and from Alhambra to 33rd Street. In addition, there is a strip of houses on the North side of B Street between Alhambra and 33rd Street. What strikes one during a site visit to the APE is the heavy concentration of one and two-story houses that are Craftsman or Period Revival. Using dates collected from County Assessor's Parcel Viewer reveals that of the 73 housing structures inside the APE, 61 were built before 1930 (84%). Within those 61 housing structures are three Queen Anne houses, two of which predate the development, 403 30th Street (1905) and John Guisto's 1893 house.

Figure 3 – There is a heavy concentration of Craftsman and Period Revival houses throughout the APE, which represents 84% of the housing. Photo by Don Cox (HEC).

The development began after local farmer and rancher John A. Guisto sold his property to the Carmichael Company sometime around 1910. An article appeared in

the Sacramento Bee, on October 15, 1910, p. 12 announcing the opening of the new subdivision. The lots could be reserved, but Carmichael promised he would turn them over to new owners when streets were paved, and curbs and sidewalks were in place. Later that month, Carmichael announced that sales of lots would begin [Bee Oct. 24, 1910, p. 10]. In that ad he mentions, "…some very choice ones have been resold." He concludes the ad with, *"Don't miss this opportunity. You can double your money in two years and perhaps before."* Encouraging this kind of speculative buying was not a good idea. It had been experienced in other developments and proved to slow down the building process. Oak Park was one example [Survey of Oak Park, Historic Environment Consultants, 2007]. Some developers later employed the tactic of placing a minimum cost for houses that could be built, as well as the expectation that building would commence within an established time frame. If building had not begun, the developer retained the right to reclaim the property [HEC National Register Nomination, Montgomery Way]. This may explain why so many homes in Casa Loma Terrace were built in the 1920s rather than in the teens.

Figure 3 - Daniel Carmichael. Photo from Willis, p. 444..

At about the same time Casa Loma Terrace was developing, Carmichael was selling 10-acre home-and-farm parcels in his signature development, Carmichael Colony. It was composed of 4,000 acres of the former Rancho San Juan Land Grant [Reed, p. 813]. The large, suburban district in eastern Sacramento County that bears his name now has an estimated 80,000 residents in a 15.5 square mile section of the Sacramento suburbs Bee, 1/24/2025 in p. 1, 2 in Real Estate Classified].

In 1907, the Sacramento Union newspaper commented on the Carmichael Company and stated that, *"This firm probably handles more property, both city and country, than any other realty concern…The firm enjoys the business of many large commercial and industrial interests."* [Union, 2/3/1907, p. 12].

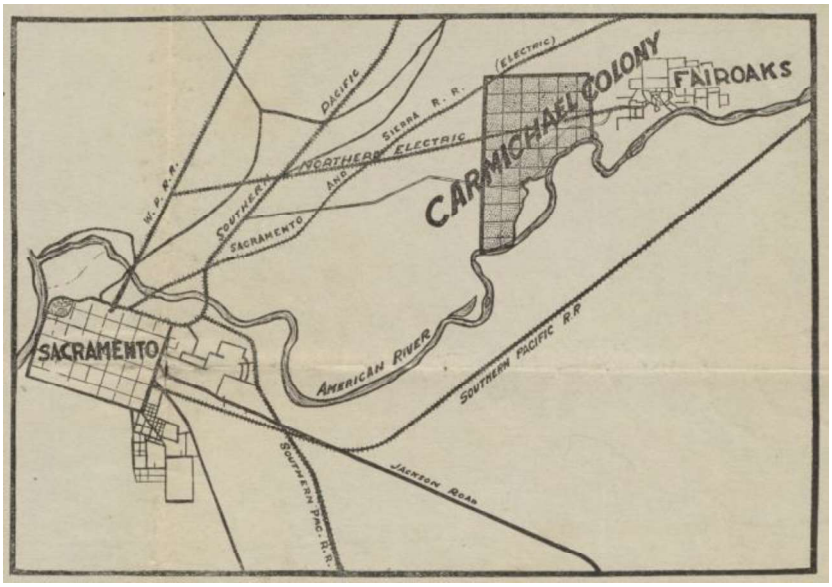


Figure 4 - A 1909 map showing the location of Carmichael Colony No. 1 (Willis, p. 447).

In his obituary, the Bee stated that, *"Carmichael was a pioneer among Sacramento real estate men and active in civic affairs during his long residence in the Capital City. He served as county treasurer and as president of the Sacramento Chamber of Commerce, as well as filling the office of mayor."* [11/2/1936, p. 2]

He also served as City Treasurer and had two terms as Mayor [Bee 11/2/1936, p.2]. He was twice elected as a delegate to the Democratic National Convention. Carmichel was also one of the pioneer developers of the Kern County oil fields. He also founded an oil and gas company.

Figure 5 - The home of Daniel Carmichael at 1903 21st Street. Photo by Don Cox (HEC).

John Guisto

Published in the Bee [4/24/1950, p. 4], the newspaper headlined John Guisto's obituary with *"Services Are Set For Asparagus Pioneer."* The Bee went on to state, *"He operated a farm in the vicinity of D and Thirty First Streets, and it was there he introduced to the Sacramento area the growing of asparagus in 1890."*

As one peruses the fruit label collection of James Henley at the Center for Sacramento History, one realizes that asparagus growing and packing was a lively part of the agribusiness economy. There were several well-known growers and packers involved in its production.

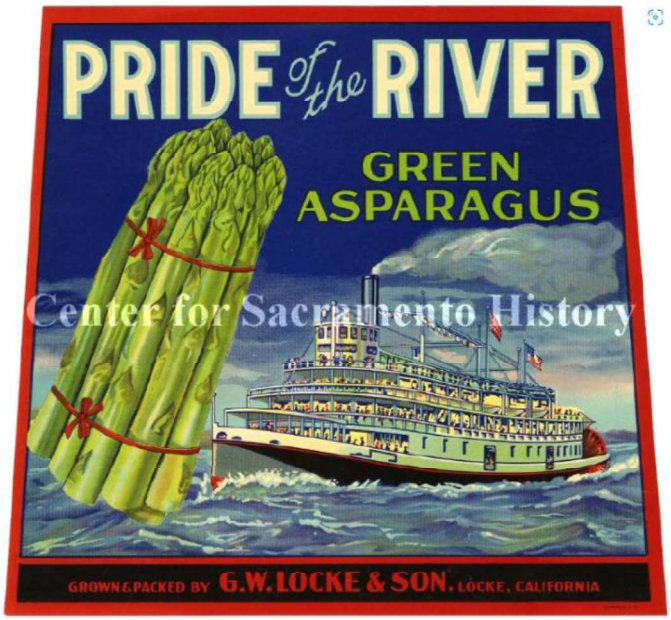


Figure 6 - Asparagus labels courtesy of the Center for Sacramento History.

Guisto's parents arrived in the Sacramento area in the early 1860s from Genoa, Italy. John Guisto was born in Sacramento in 1863.

Guisto sold his property near D and 31st Street (now Alhambra Boulevard) in about 1909. However, he had other plots of land and continued to farm until 1930.

John Guisto and his wife, Mary, built a house on the property at 3135 D Street in 1893. John lived there and died there in 1950. Mary lived there until she died in 1962. Her obituary credits John as, *"…one of the first asparagus growers in the Sacramento Valley."* [Bee 9/14/1962, p. 29]

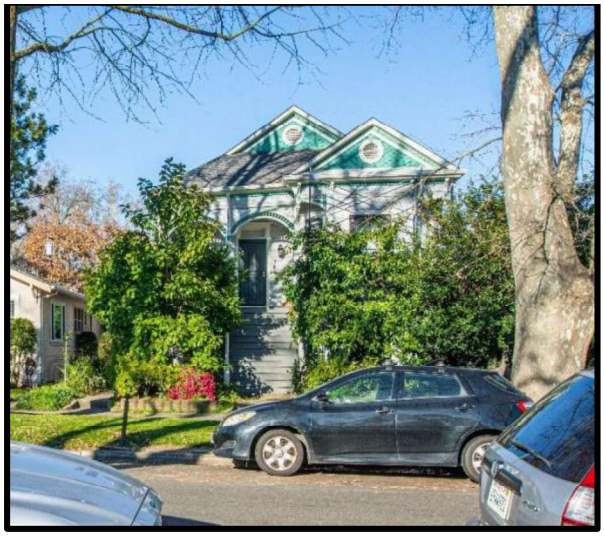


Figure 7 - The 1893 Queen Anne house built by John and Mary Guisto still graces the neighborhood of Casa Loma Terrace.

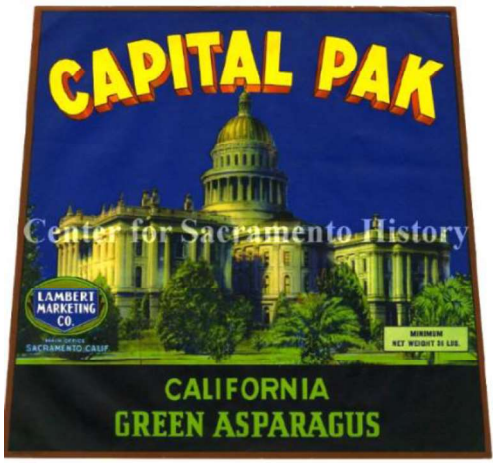


Figure 8 - Asparagus labels courtesy of the Center for Sacramento History.

Conclusions

The residential housing in the APE meets two of the criteria for listing in the Sacramento Register of Historic & Cultural Resources.

It meets Criteria ii – they are associated with the lives of persons significant in the city's past; and iii – they embody the distinctive characteristics of a type, period, or method of construction.

Criteria ii

The Casa Loma Terrace development is associated with its developer, Daniel W. Carmichael, and his company, the Carmichael Company. He served two terms as Mayor of Sacramento, two terms as County Treasurer, a term as City Treasurer, and was a president of the Sacramento Chamber of Commerce. He and his firm were recognized by the Sacramento Union by stating, *"This firm probably handles more property, both city and country, than any other realty concern."* He also has the major suburb of Carmichael named after him.

Figure 9 – Mural in Carmichael Park, photo by Don Cox (HEC).

Casa Loma Terrace is also associated with John Guisto who was responsible for introducing the growing of asparagus to the Sacramento Region. Many growers and packers joined the movement. Asparagus growing became a vibrant component of the Sacramento Valley agribusiness sector. John and Mary Guisto continued to live in the neighborhood from 1893 to 1962, almost seventy years. Their 1893 Queen Anne home still graces the neighborhood.

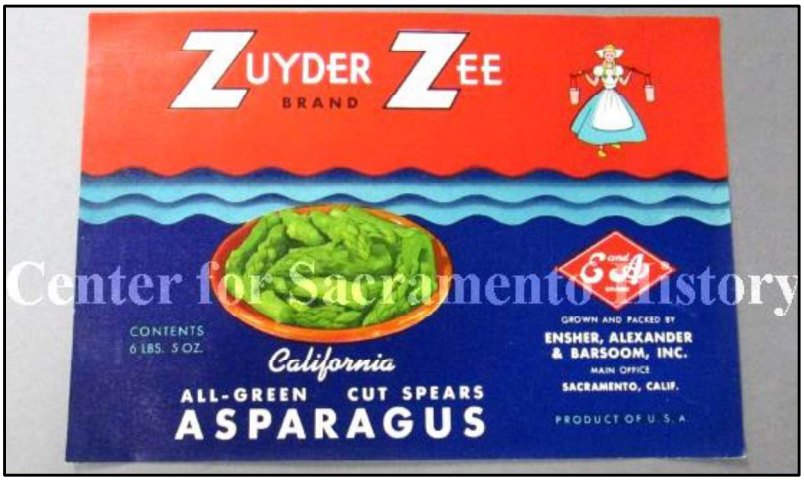


Figure 9 - Asparagus labels courtesy of the Center for Sacramento History.

Criteria iii

The homes in the APE and throughout Casa Loma Terrace embody the distinctive characteristics of Craftsman and Period Revival homes built before 1930. The neighborhood has a heavy concentration of these homes and there have been relatively few changes and alterations. In the APE, 84% of the houses fit this definition. The same percentage prevails throughout Casa Loma Terrace. All these properties could become contributing resources to a potentially larger historic district.

This APE meets the criteria to be eligible for designation as an historic district in the Sacramento Register, California Register, and the National Register of Historic Places.

The proposed 6-story project is inappropriate and incompatible in this historic residential neighborhood. The homes in the district are one and two-story. The massive development project will tower four to five stories above that. Designed to be some 68 feet high in a district with a zoning code limit of 35 feet, this new project will tower over the tree-tops and will be seen for some distance. Introducing an urban-style project into a residential historic neighborhood at C Street east of Alhambra Boulevard is problematic. C Street is a major access road for neighborhoods north of E Street, including the commercial office buildings at the historic former American Can Company complex and McKinley Village.

The proposed 6-story project is 68 feet tall

Traffic and Parking

There is a steady volume of traffic in the APE along 30th Street, Alhambra Boulevard, and C Street which is highly evident during a site visit. It is particularly constricted, gridlocked, and untenable as the Elvas Expressway pours into this narrow residential historic neighborhood at C Street east of Alhambra Boulevard. For what should be a quiet residential neighborhood, the traffic is already extremely excessive. Parents with small children should not let them play in the front yard unless closely supervised. Add to that chaos, a 332-unit apartment complex. Using metrics provided by Preservation Sacramento, 332 dwelling units will add about 450-500 daily vehicles to local traffic. What may well happen is that when traffic on C Street gets heavier, some vehicles will begin using D Street. Half a million vehicle trips yearly added to an already overcrowded street system with little street parking available, is unacceptable. H Street already carries freeway volumes as the report in Appendix 1 shows, and it is gridlocked during daily commute hours. Bringing in more cars completely overwhelms the already unsafe volumes in East Sacramento.

Even with 322 parking spaces in the garage, the spillage will fill the local neighborhoods. This is not a transit-oriented housing project. There is no RT train station nearby and the closest bus line is a 6-block walk to J Street. Using C Street, Alhambra Boulevard, and the Camelia City Freeway for high volumes of traffic make this heavily congested vehicle area even worse within this older, historic, park-centered neighborhood.

Figure 10 - On a random site visit, the photograph above shows three cars heading east on C Street at Alhambra Boulevard as well as on coming south on Alhambra.

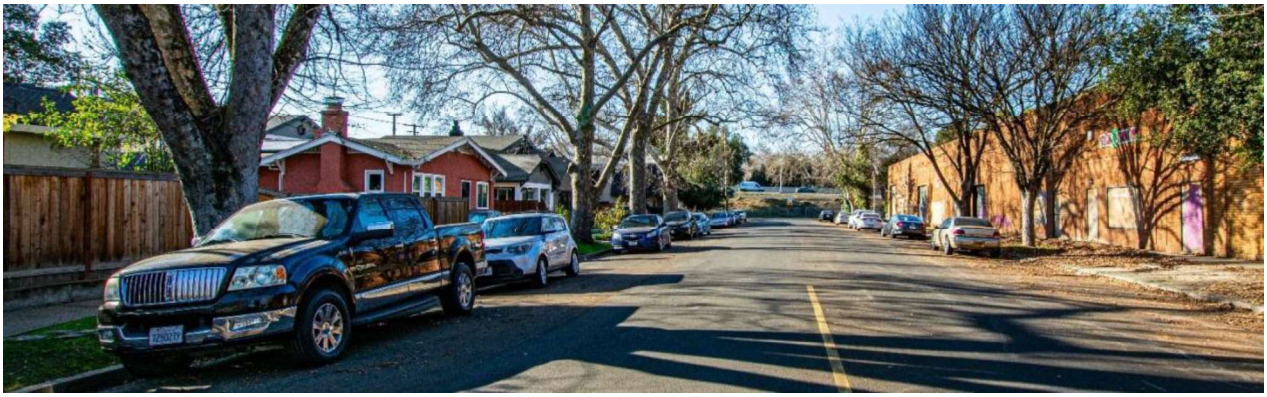


Figure 11 - In this photo, even though parking is available in the rear, there are seventeen cars parked on the stree. Photo by Don Cox (HEC).

Conclusions

Traffic in this potential historic district is already excessive on C Street and Alhambra Boulevard. It is projected that this oversized, out of scale, 6-story development with some 332 apartments producing as many as 450-500 vehicles making several trips a day, will generate an additional half-million vehicle trips a year through these neighborhoods.

Parking is inadequate and the overflow will spill into the APE. There is no mass transit option readily available. The location of this project along existing east-west streets makes it a car-centric project. Parking and traffic problems will make the historic APE a less desirable place in which to live, and it is likely that property values will fall. So far, this commentary has only focused on the traffic and parking problems that will be created by the residents. There will be additional traffic and parking problems. Service and supply trucks will need to have a place to park. So will all the friends and family who show up to visit the residents of 332 apartments. The problems of parking, traffic, and sewage will also have a negative effect on McKinley Park, which is listed in the National Register of Historic Places.

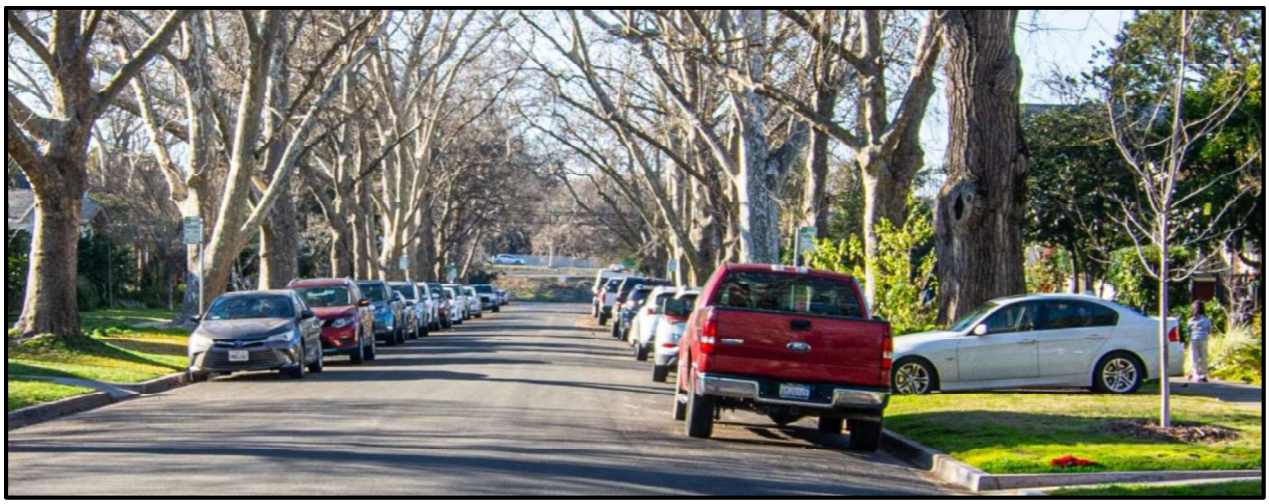


Figure 12 - Streets in Casa Loma Terrace already have traffic and parking problems, photo by Don Cox (HEC).

Sewage

Before recent work on the underground sewage storage vault at McKinley Park, heavy storms forced the combined sewage and storm water system to overflow and would send raw sewage floating down the low-lying streets, yards, and basements. Adding the proposed large-scale development project will contribute to the ongoing sewage issues, already difficult and dangerous, as experienced by residents in nearby McKinley Park neighborhoods.

Mitigation

The mitigation measures called for by Groundwork are incomplete. Just retaining some existing brick walls and incorporating them into a new structure is insufficient. Without accompanying plaques, photos, and displays the entire significance of the old building is completely lost. Otherwise, the presence of the brick walls merely looks like

decoration on a new building. Also, if you look closely at the plan elevations, the historic brick façade will be punctured by several new doorways and windows.

Figure 13 - A 1948 obituary for part-owner George Wurster named Pureta Sausage Co. as "…one of the largest firms of its kind on the Pacific Coast." [Bee, August 28, 1948]. By 1957 Pureta had expanded its truck fleet to 50, and was employing up to 200 people. Photo courtesy of the Center for Sacramento History.

*Figure 14 - Notice that they weren't packaged as Ball Park Franks, but **Pureta** Ball Park Franks! (Photo courtesy of the Sacramento Center for History.)*

Conclusions

The proposed mitigation for this 6-story development is inadequate. As proposed, it is nothing but facadism. Unless an effort is made to display the history and importance of the Pureta Sausage Company, its significance will be lost forever.

Casa Loma Terrace

Casa Loma Terrace meets two of the most important criteria for listing in the Sacramento Register of Historic and Cultural Resources. It has a significant concentration of craftsman and period revival homes built before 1930 (84%). It is also associated with people who were significant in Sacramento's history (Daniel Carmichael and John Guisto). The proposed project negatively impacts the health and safety of residents, and will destroy the character of this neighborhood and make it a less livable area.

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Sacramento Bee

Sacramento City Directories

Sacramento County Assessors Data

Willis, William, History of Sacramento County, California, Historic Record Company, Los Angeles, 1913, pp. 444-447

SACRAMENTO
Community Development

300 Richards Blvd., 3rd Floor
Sacramento, CA 95811

Help Line: (916) 264-5011
planning@cityofsacramento.org

Appeal of Commission-Level Decision

City Code Section 17.812.060

I. Form Instructions

Overview: Any person dissatisfied with a Commission-level decision may appeal it to the City Council. Appeals must be filed within 10 calendar days of the decision.

Filing Instructions: All the following are required:

I. Complete Form: Fill all portions of this form with required information.

II. Submit Form:

- Online by emailing to planning@cityofsacramento.org; **OR**
- Deliver in-person to the Planning Counter at 300 Ricards Boulevard, 3rd floor.

III. Pay Fee. Once this form is submitted, city staff will generate an invoice. The appeal is not considered timely filled until the fee is paid. The fee may then be paid online on the Public Permit Portal or in-person at 300 Richards Blvd, 3rd floor.

- Appeal Fee is: $11,115 for Project Applicants; $1,045 for Third Party

How to Ask Questions: Please contact the planner assigned to the application being appealed, send an email to planning@cityofsacramento.org, or make an appointment to visit the Planning Counter in-person at 300 Richards Blvd, 3rd floor. To schedule an in-person visit, please use the Appointment Scheduling webpage.

II. Appellant Information

Name: Casa Loma Terrace - East Sacramento Neighborhood Association

Email: casalomaeastsacna@gmail.com

Phone Number: (916) 217-6285

Mailing Address: P.O. Box 160033, Sacramento, CA 95816

Signature: [signature]

Date: February 23, 2026

III. Appeal Information

Project Name: Alhambra Redevelopment Project

Application Number: P24-007

Commission Decision Date: February 12, 2026

Grounds for Appeal (Attach Additional Pages, as Needed):

See attached letter please.

CASA LOMA TERRACE – EAST SACRAMENTO NEIGHBORHOOD ASSOCIATION
P.O. Box 160033, Sacramento, CA. 95816
casalomaeastsacna@gmail.com

February 23, 2026

Sacramento City Council
City of Sacramento
Planning & Design Commission
300 Richards Boulevard, 3rd Floor
Sacramento, CA. 95811
planning@CityofSacramento.org

SUB: P24-007 "ALHAMBRA REDEVELOPMENT PROJECT" APPEAL

Dear Members of the City Council and the Planning & Design Commission,

Casa Loma Terrace – East Sacramento Neighborhood Association, on behalf of its members and other neighbors and residents, respectfully appeals the February 12, 2026 decision by the PDC to approve P24-007 the Alhambra Redevelopment Project.

We are asking that it be conformed to the 35 foot height limitation, in accordance with the General Plan ("any element of the general plan as existing on the date the application was deemed complete") and local zoning specifications, which are consistent with each other, and objective as judged by a reasonable person; as well as other applicable requirements.

Significant health and safety concerns would be created by approval beyond the 35 foot height limitation.

We are not against reasonable and appropriate higher density development at this site, and would welcome a compliant project that brings new life and neighbors to this site which has been severely neglected by its owners for years.

Under the Housing Accountability Act, local governments are NOT prohibited from requiring a housing project to comply with objective, quantifiable, written development standards, conditions and policies. The City of Sacramento has such standards, which were available to both the development applicant and public officials at the time of application and review.

HEIGHT AND SCALE

Sacramento City Code 17.420, Alhambra Corridor Special Planning District (ACSPD) states in part:

> "The planning and design commission may approve a conditional use permit allowing additional height [above 35 feet]. To approve the conditional use permit, the planning and design commission **MUST find that the development will NOT be out of scale with the adjacent residential neighborhood."** (emphasis added)

Consistency with this local zoning, and further support for it, are found in multiple elements of the City's 2040 General Plan, including:

- LUP-6.3, regarding scale, states in part: "The City **shall** promote the development of... **Neighborhood-scale** multi-unit buildings."

P24-007 is dramatically out of scale with the adjacent neighborhood, by all objective measures:

COMPARISON: MEASURE:	**P24-007**	**ADJACENT NEIGHBORHOOD**
HEIGHT	68 feet	18 to 30 feet
NUMBER OF STORIES	6	Mostly one-story; some two; Plus (2) three story commercial buildings.
# PEOPLE PER SQUARE BLOCK	870	48 to 96
# PEOPLE PER ACRE	395	12.8 to 25.6
SQUARE FOOTAGE	442,390	890 – 1,800 average, plus smaller ADU's, apartment building(s).

There can be no reasonable finding that P24-007 is in scale with the adjacent residential neighborhood, and therefore the requested CUP cannot be supported.

The requested height exception also conflicts with the 2040 General Plan, as regards scale and neighborhood form:

- INTEGRATING INFILL DEVELOPMENT, p. 3-26 "Site planning that **encourages fine-grained development (i.e., small blocks and building footprints**) helps to achieve a more pedestrian-friendly environment and provides opportunities for access and connectivity to surrounding streets and neighborhoods.

- LUP-6.4, regarding neighborhood form, states "The City **shall** recognize **the patterns in existing neighborhoods** by developing **defined transitions** between these neighborhoods and adjoining areas, and by requiring that new development, both private and public, consider the existing physical characteristics of buildings, streetscapes, open spaces, and **urban form of the neighborhood** in its design. Designs ... should contribute to the **livability** of the neighborhood."

- LUP-8.11 Neighborhood and Transitions. The City shall ensure that development standards facilitate transitions between areas that border one another so that **neighborhoods and districts maintain their own unique qualities.**

  There is nothing about this project that can be considered a transition, when a massive 68 foot tall building is surrounded by one- and two-story residential housing, and a couple of 3 story light commercial buildings, all under 35 feet.

The project also completely fails to consider the pattern or urban form of the neighborhood, and will damage, rather than contribute, to the livability.

Therefore, the proposed height cannot be approved, and must be limited to the established zoning of 35 feet.

There *are* three newer six story residential buildings in East Sacramento. ALL of them are **unlike P24-007**, in that:

- Two are on light rail, one is across the street from Sac State. They are NOT car centric. They are transit and pedestrian oriented.
- There is no height limitation in zoning for those locations
- They are in commercially developed neighborhoods adjacent to substantial office, retail and related.

There is one older six-story building in East Sacramento, 4100 Folsom Boulevard, which the Planning & Design Commission cited as a comparable project in making their decision. It bears no comparability to the current project, with just 36 units, being set well back from the street, and so screened by tall trees that it is barely visible. P24-007 has 332 units, builds to the sidewalk, and has minimal tree screening.

Height restrictions along Alhambra are dropped beginning southbound at J. P24-007's area has specific height restrictions.

GREENHOUSE GAS EMISSIONS, AND SAFETY

Sacramento has the highest traffic fatalities per population compared to other peer cities in California, three times that of San Francisco's.[1]

57% of Sacramento's greenhouse gases are from transportation, exceeding that of the state (40%) and the nation (29%).[1]

At congested locations, vehicles are forced into idling and constant stopping and starting. Researchers estimate that idling from heavy-duty and light- duty vehicles combined wastes about 6 billion gallons of fuel annually. About half of that is attributable to personal vehicles, which generate around 30 million tons of CO2 every year just by idling.[2]

Yet P24-007 incentivizes vehicle use. Not being near light rail, a major bus line, or significant office buildings, the project will add **990,236** vehicle trips per year, as **19,043** per week, up to **3,300 per day**[3].

Where will this traffic go? Into already badly congested and unsafe routes:

[1] City of Sacramento, Streets for People – Sacramento Active Transportion Plan, Street Design Standards Amendment.
[2] U.S. Department of Energy, "Idling Reduction for Personal Vehicles", page 1.
[3] City of Sacramento P24-007 Initial Study/Mitigated Negative Declaration, Appendix B, Air Quality and Greenhouse Gas Modeling Results

- In that all vehicles must exit the project at only two locations: Alhambra and C, or Alhambra and D, this project is unlike any other large-scale projects in the area, and creates a major traffic safety problem.
- The entire Alhambra Boulevard corridor, C Street, McKinley Boulevard, H Street have a high pedestrian level of traffic stress.[4]
- Alhambra Boulevard is a bike and pedestrian route for school-aged children going to and from Miwok Middle School.
- The intersection of 29th & H is rated as the second worst in the city for collisions between cars and bikes.[5]
- Alhambra Boulevard at E/McKinley is chronically congested, with unsafe pedestrian crossing to McKinley Park from the north (where the project will be).
- The E street on-ramp to Business 80 east bound, and Business 80 east bound from J to the American River, is one of the most congested sections of freeway in the City. It will not get better: physical limitations of passing under the railroad tracks limit the number of lanes possible without multi-million dollar modifications, which CalTrans has rejected.
- 29th & K is tied for worst intersection for collisions involving people walking.[6]

This project solidifies permanent, large-scale, intensive reliance on vehicular transportation, and should be scaled back to reduce this in order to comply with the General Plan and applicable zoning.

This area already has some of the highest pollution burdens in the City[7].

With this many trips, no parking for retail, and a difference of nearly 500 less parking spaces than potential residents, this generates an enormous burden of carbon emissions from driving, idling, and circling vehicles. This project has an irresponsible, unacceptable, permanent carbon footprint.

The 2040 General Plan contains a number of vision statements, policies, and specifics regarding greenhouse gas emissions, pedestrian safety, and vehicle accidents.

P24-007 works counter to nearly all of them, being a car-centric proposal rather than being on a light rail corridor or adjacent to major office and retail buildings (which other newer 6-story residential buildings in Sacramento are).

As regards vehicle use, some elements of the General Plan which P24-007 is inconsistent with, even works against, include:

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[4] Streets for People op cit, Appendix 3, p. 26
[5] Streets for People op cit, Appendix 2, p. 48
[6] Streets for People op cit, Appendix 2, Table 6, p. 49
[7] Streets for People op cit, Appendix 2, p. 19

- M-4.3 **Vision Zero**. The City shall utilize a data driven, "vision zero" approach to eliminate all traffic fatalities and severe injuries by 2027, while increasing safety, health, and equitable mobility for all.

- **Introduction/Overall Vision** (p. 1-1): "For the community to continue to flourish, Sacramento will need to ensure that this growth happens in ways that are both sustainable and equitable. This will mean... reduce vehicle miles traveled and greenhouse gas emissions."

- **General Plan, Sustainability and Equity, Table 2-1** Indicators, p. 52: "The single-occupant vehicle is the dominant mode of transportation in Sacramento, which leads to traffic congestion, air pollution, and GHG emissions that contribute to global warming. Amid growing climate and equity concerns, it is essential to incentivize and inspire a behavioral shift to other travel modes by working to make our roads safer, make transit service more frequent and reliable, and make active transportation modes like walking and bicycling more convenient and attractive."

DESIGN GUIDELINES:

The project fails to satisfy Alhambra Corridor Special Planning District design guidelines for the zone, and conflicts with the expressed intent of the General Plan in several regards. Objective and quantifiable written standards governing design exist.

Unlike almost all other new developments in the general area, the units do not open to the street. Apartment residents drive in and out, and never become part of the neighborhood.

- The Alhambra Corridor Design Review Guidelines require new development to be "similar in scale and architectural character to adjacent single-family residential structures."

- In the proposed design, occupants will not be our neighbors – no residences have doors or garages opening to the neighborhood. Rather these will be a large number cars commuting through the neighborhood and zooming into their building.

- LUP-6.5 Established Neighborhoods. "The City should encourage new development to respect the pedestrian-scale, pre-automobile form, and lush urban forest that typifies established neighborhoods and contributes to their sense of place." This project does the opposite.

- LUP-4.8 Buildings that Engage the Street. The City shall require that buildings be oriented to actively engage and enhance the public realm through techniques such as building orientation, build-to and setback lines, façade articulation, ground-floor transparency, and location of parking.

  In fact P24-007's residential building is nearly opaque to the neighborhood, with residents entering through a parking garage, and only one primary pedestrian entrance.

This is not integrated with the neighborhood, and offers no opportunity to become part of it. This is completely unlike most other new development in the greater area.

The 2040 General Plan emphasizes neighborhood streets should function as vital public spaces where neighbors interact, and that new development should strengthen a sense of place and integrate with the existing neighborhood.

- LUP-6.2 Range of Residential Development Intensities. "The City shall allow for a range of residential development intensities throughout the community to cultivate a mix of housing types at varying sales price points and rental rates, provide options for residents of all income levels, and protect existing residents from displacement."

  No senior or affordable housing is included. This project does zero to contribute to a mix of housing types, affordability, or diversity.

- LUP-6-1 Neighborhoods as a Basic Unit. Recognizing Sacramento's neighborhoods as foundational elements of the city's urban structure, the City shall work to enhance their **livability.**

- P24-007 bears no resemblance to the historic Craftsman, Period Revival and Bungalow styles, identified in City design guidelines, that define Casa Loma Terrace. Large expanses of corrugated metal dominate three of its façades, directly facing historic 1930s single-family homes, despite the fact that no residential structures in East Sacramento use corrugated metal as a design material.

INITIAL STUDY/MITIGATED NEGATIVE DECLARATION (ISMND)

The ISMND was badly flawed, containing numerous factual errors, faulty analyses, and omissions. However, the City has not redone it, and the Planning Commissioners were not given any of the extensive feedback which was given to the City by residents and experts.

Rather than correcting the ISMND's flaws, the City decided to exempt the project from CEQA, even though it had already determined that the project had environmental impacts. The project does not qualify for exemption under AB 130, and should not be exempted.

AB 130

AB 130 was passed on June 30, 2025. This is well after the submittal of the application in February 2024, and after the ISMND was completed on April 21, 2025. The CEQA exemption cannot be applied retroactively. Projects are subject to the regulations in effect as of the submittal or ISMND. No discussion of AB 130 provisions was included in the ISMND, and affected parties were not notified of its application until notice of the February 12 hearing.

AB 130 requires, "as one of the conditions for certification of a housing development project, that it not result in any net additional emission of greenhouse gases, including greenhouse gas emissions from employee transportation." Clearly, as discussed above, the

nearly one-million vehicle trips added to a congested area will result in significant additional emission of greenhouse gases, in an area already heavily burdened with pollution from vehicle emissions.

HAZARDOUS MATERIAL

The project further cannot rely on an AB130 exemption because the site contains a known underground storage tank (UST) with petroleum products, and the City has not provided any verified information about its condition, removal, or potential contamination. A 2022 study identified a 1,500–2,000 gallon unregistered UST directly in the path of proposed construction, yet no assessment has been completed to determine whether soil, groundwater, or vapor impacts exist.

AB130 does not allow an exemption when a project site may contain hazardous materials that have not been fully identified or evaluated. The lack of basic environmental due diligence, no sampling, no remediation records, and no confirmation of UST closure, means the City cannot make an informed determination that the project will not cause significant environmental impacts. Without this information, applying an exemption is improper.

HOUSING ACCOUNTABILTY ACT

The project has been described as "all market rate" housing. California Government Code Section 65589.5, subdivision (h)(3) provides very specific requirements for a housing project to be considered affordable to very low, lower- or moderate-income households. These are based on specified rental rates, percentage of units rented to lower income households, or 100% occupancy by persons of specified income levels, and limitations on housing costs as percentages of area median income.

The applicant has failed to document compliance with any of these. Absent proof by the applicant of rental restrictions ensuring compliance with 65589.5 (h)(3), the application cannot be considered as qualifying for provisions of affordable housing. Therefore, any provisions of the HAA which would limit the application of city codes (zoning and general plan) can not be applied to this project.

WASTEWATER

The project will generate 102,920 gallons of sewage a day that will be released into the City's aging combined sewer system. That system was never designed to handle the effluent from such a high density project, is already at capacity, and overflows when it rains. The additional load from such a high-density project could prove catastrophic. This has not been analyzed or addressed, simply noted that it "will be mitigated". How it will be mitigated, and who will pay, is unspecified. This must be determined in advance, to ensure it is adequate, and lest taxpayers subsidize a wealthy applicant's project.

Should an actual sewer blockage occur, simple hydraulics tells us that sewage coming from 50 feet above street level will likely erupt in the bathrooms and kitchens of street level homes in the neighborhood. This has actually occurred in Sacramento, not far from the project.

Scaling this project back to the compliance level of 35 feet reduces or eliminates problems related to effluents.

PARKS IMPACT

A project of this size should be offset by 7.5 acres of parkland. P24-007 instead will just pay an impact fee, without any mitigation of impact. McKinley Park will bear the burden of this, and is already overcrowded with use, particularly on weekends.

The ISMND disingenuously states: "The proposed project is located within 0.5-mile of Leland Stanford Park, Sutter's Landing Regional Park, Michael Himovitz Park, Russ Solomon Park, R. Burnett Miller Park, and McKinley Park". (p. 99) Perhaps accurate as the crow flies, but people do not fly.

Michael Himovitz Park, Russ Solomon Park, and R. Burnett Miller Park are all at least one mile from the project, via city sidewalks or streets, measured from the corner of Alhambra and C Streets. This is double what the ISMND reports, and people are unlikely to visit these with McKinley Park just one block away. Sutter's Landing Park is a largely arid area, primarily of interest for the dog park and skateboard facility.

POPULATION IMPACT

The ISMND states (p. 95) "The increase in population associated with the proposed project would constitute a 0.16 percent increase in the City's total population, which would not be considered substantial growth" and concludes that this represents no impact.

The entire city is not a relevant area for comparison. Any single project in the greater central area will obviously have no impact at places such as Arena Blvd at Natomas Dr, Cosumnes at Franklin etc.

Rather, East Sacramento, where this project will impact, should be used. The estimated population of East Sac is 21,910. The proposed 870 new residents would constitute a 3.97% increase, which is substantial and very significant.

For a frame of reference,

- adding the entire City of Sacramento (population 535,798) to the State of California would only be a 1.35% increase.
- Adding the entire City of San Jose (943,212) to the State would be a 2.39% increase.

The project's addition to East Sacramento is a greater impact than adding San Jose to California would be.

PARKING

Although the City has no requirements for parking, the greenhouse gas emission/ carbon footprint of cars circling for parking is important whether or not the City chooses to think about

it. With insufficient parking on site for the residents, plus retail on the ground floor, this project will result in cars circling and idling as they look for parking. This is not a responsible choice.

OUTREACH/INPUT

The developer has offered no community outreach to solicit community input, other than one community meeting which was called and hosted by three neighborhood associations. The applicant took no suggestions, and incorporated no input. I contrast this with other recent major development projects in East Sacramento:

- McKinley Village, where the developer had 30 community meetings and another 51 community meetings with various organizations, and reported making "hundreds" of changes in response to community input.
- Sutter Park, where Paul Noble of the East Sacramento Improvement Association "told council members that the developers did a good job of reaching out to the people in the neighborhood. They were actually looking for ideas, and they listened to what the people had to say".

Why is this applicant unwilling to work together to develop a project neighbors can support? Recognizing the need for housing, the neighborhood does not oppose development, and in fact would welcome a positive addition to the neighborhood to replace the dilapidated, unkempt, 'attractive nuisance' the owner has allowed for over 10 years now.

IN CONCLUSION

P24-007 conflicts with both the General Plan, and the ACSPD; creates health and safety risks; and fail tests for exemption from CEQA. It does not represent responsible growth. Rather, it is a permanent, bad mistake of large scale, with major negative impact on the City's greenhouse gas reduction goals.

Please return this project to the applicant to be redesigned within the established limitations, as the Planning Commission did with the projects at the former Sacramento Bee site(s).

S/
Carl Seymour
President, Casa Loma Terrace – East Sacramento Neighborhood Association

Attachment 8 – Staff Response to Third-Party Appeals

A. Citizens For Positive Growth & Preservation Appeal

Section	Summary of Issue	Staff Response
A-1	Appellant asserts that the project is not guaranteed the protections from the State's Housing Accountability Act (HAA) as the staff report contains no analysis of the HAA and the project does not guarantee the inclusions of lower- or moderate-income units.	Staff disagrees. The HAA, codified as Government Code section 65589.5(j), establishes that cities cannot disapprove or impose a condition that a housing development project be developed at a lower density when a project is consistent with the applicable objective general plan, zoning, and subdivision standards and criteria, including design standards, unless upon written findings supported by a preponderance of evidence on the record that both of the following conditions exist: 1. The housing development project would have a specific, adverse impact upon the public health or safety unless the project is disapproved or approved upon the condition that the project be developed at a lower density.. 2. There is no feasible method to satisfactorily mitigate or avoid the adverse impact identified pursuant to paragraph (1), other than the disapproval of the housing development project or the approval of the project upon the condition that it be developed at a lower density. Government Code section 65589.5(j) applies to "housing development projects" as defined by Government Code section 65589.5(h)(2) which includes: A) residential units only [regardless of affordability]; B) mixed-use developments consisting of at least two-thirds residential uses [regardless of affordability]; C) transitional housing and/or supportive housing; or D) or farmworker housing. As proposed, the project is a mixed-use development consistent with this Government Code statute. As outlined in the staff report, the project is consistent with the applicable objective standards of the General Plan and Sacramento City Code (SCC) Title 17, including all applicable development standards of the General Commercial (C-2-SPD) zone and the Alhambra Corridor Special Planning District (SPD), and Alhambra Corridor Supplemental Design Guidelines. Staff did not find that the project would cause a specific, adverse impact upon the public health or safety requiring the need to deny or reduce the density of the project. For this reason, staff found denial of the project would be contrary to State laws such as the HAA (Government Code section 65589.5) and other related statues and recommended approval to the Planning and Design Commission, who subsequently approved the project.

A-2	Appellant asserts that the HAA does not prohibit local agencies from disapproving of projects that are inconsistent with applicable plans and ordinances.	See Response A-1.
A-3	Appellant restates the provisions of Sacramento City Code section 17.420.020.B related to the "residential preservation transition buffer zone" in the Alhambra Corridor SPD.	Comment noted.
A-4	Appellant states the project is inconsistent with applicable zoning ordinances because it does not comply with the height restrictions governing development in the Alhambra Corridor SPD.	Staff disagrees. While the Alhambra Corridor SPD reduces the by-right maximum height of sites to 35 feet when within 300 feet of a residential zone (measured from the street centerline), the Alhambra Corridor SPD also establishes a process to exceed the 35 foot limit height restriction when authorized by a Conditional Use Permit (CUP) approved by the Planning and Design Commission, provided that the height of the proposed building does not exceed the limits established by the applicable base zoning. The project includes a request for a CUP to authorize the mixed-use development to exceed the 35-foot height restriction in the Alhambra Corridor SPD. As outlined in the staff report, the project as designed complies with the height requirements of the site's base zone thereby complying with the requirements set forth in the C-2-SPD zone and the Alhambra Corridor SPD. Per Staff Response A-1, staff did not find that the project would cause a specific, adverse impact upon the public health or safety requiring the need to deny the project or reduce the density.
A-5	Appellant argues that the project's building height is incorrectly measured and exceeds the applicable base zone height limits set by the C-2-SPD zone.	Staff agrees that the SCC section 17.216.720 establishes a maximum by-right height of 65 feet for the C-2 zone as well as a transitional height requirement for portions of buildings located next to R-1, R-1B, and R-2 zones. This includes a height restriction of 45 feet at a distance of 39 feet or less, 55 feet at a distance of 40- 79 feet, and 65 feet at a distance of 80 feet or more. Beyond 79 feet, the transitional height requirements revert back to the base zone maximum height of 65 feet. At this distance, the height of building is defined as *"the vertical dimension measured from the average elevation of the finished lot grade at the front of the building to the plate line, where the roof meets the wall"* (SCC section 17.108.030) and the area above the plate line of the final finished floor is considered a roof structure which may *"exceed the maximum height allowed in the zone by up to 20 percent"* (SCC section 17.600.145). As outlined in the staff report, the project as designed complies with the transitional and maximum height requirements as well as maximum roof exceedance requirements in City Code thereby complying with the requirements set forth in the C-2-SPD zone and the Alhambra Corridor SPD.

A-6	Appellant states the Commission's approval of a CUP is improper because there is no substantial evidence that a project of this height and mass would not be out of scale with adjacent residential development even with the planned step-backs.	The Alhambra Corridor SPD and Alhambra Corridor Supplemental Design Guidelines do not objectively define "neighborhood character/scale" or objectively define design standards, such as step-backs, that projects are required to implement to be in scale with the adjacent residential neighborhood. While the City is able to "shape" a residential development based on the reasonable application of adopted policies and regulations, applying requirements that are not applicable to the development site that would result in reduced project density or make the project infeasible, would be contrary to State laws such as the HAA (Government Code section 65589.5) and other related statues. In absence of objective standards, the project has been reviewed for consistency with the development standards of the General Plan, the underlying C-2-SPD zone, Alhambra Corridor SPD, and the Alhambra Corridor Supplemental Design Guidelines. As outlined in the staff report, the project results in development consistent with the anticipated buildout under the General Plan and incorporates substantial building step-backs into the upper floors along Alhambra Boulevard and portions of D Street and Chinatown Alley. The project also complies with all objective development standards of the General Plan, C-2-SPD zone, and Alhambra Corridor SPD. Thus, staff find the design of the mixed-use development, even with the additional height, is consistent with the purpose and intent of the Alhambra Corridor SPD buffer zone.
A-7	Appellant states the project is inconsistent with the General Plan for various reasons, as follows:	Staff has listed and responded individually to each concern below:
	A. The project is not consistent with the City of Sacramento General Plan because it fails to comply with various General Plan policies, including Land Use Policies LUP-3.11, LUP-4.1, LUP-4.6, and LUP-6.4, Mobility Policies M-3.1, M-3.2, M-3.3, M-4.1, M-4.2, M-4.3, and M-4.4 and Public Facilities and Safety Policies PFS-3.3 and PFS-3.6.	The project is consistent with the General Plan and relevant policies as outlined in the staff report. As established by the General Plan, the City, in its discretion, shall determine a proposed project's consistency with the City's General Plan. Consistency is achieved if a project will further the overall objectives and policies of the General Plan and not obstruct their attainment, recognizing that a proposed project may be consistent with the overall objectives of the General Plan, but not with each and every policy thereof. Staff has reviewed the project for consistency with the General Plan and determined the project adequately meets the intent and therefore recommended approval to the Planning and Design Commission. The Planning and Design Commission subsequently approved the project subject to findings of fact and conditions of approval.
	B. The project is not consistent with the General Plan because the project is not designed to properly consider the existing physical characteristics of the	See Response A-1 and A-7A. In addition, the 2040 General Plan and General Plan MEIR anticipated development of the project site with uses consistent with the Residential Mixed Use (RMU) land use designation. Such on-site uses were anticipated to occur at a

	buildings in the residential preservation transition buffer zone at its current height and urban form, which is inconsistent with General Plan policy LUP-6.4 (Neighborhood Form).	minimum building density of 20 dwelling units per acre (du/ac) and a maximum floor area ratio (FAR) of 4.0. At a building density of 142 du/ac and with an FAR of 3.37, the proposed development would be consistent within the generally anticipated buildout for the site. Because the City's General Plan does not objectively define "neighborhood form," staff has applied the only applicable objective development standards available when reviewing the project for consistency with the General Plan. As outlined in the staff report, the project is consistent with the General Plan.
	C. Appellant asserts that the Project's impacts on the Combined Sewer System (CSS) have not yet been adequately assessed so it would be impossible for the Commission to conclude that the Project is consistent with General Plan Policy PFS-3.6, which states "*the City shall ensure that development in the CSS does not result in increased flooding, CSS outflows or combined system overflows…"*	See Response A-1 and A-7A. In addition, the project is adequately conditioned to ensure increases in sewer flow are mitigated. The Department of Utilities has imposed conditions of approval that require the developer provide a sewer study to evaluate whether the CSS main connecting to the project has sufficient capacity. If not sufficient, the developer would be required to upsize sewer mains as needed. The proposed project would also subject to pay applicable development impact fees for the increased sewer impacts.
	D. Appellant argues that the Project is inconsistent with the City's General Plan Housing Element because the project does not include any lower income units even though the project is located on two sites listed in the 2021-2029 RHNA Housing Element Sites Inventory for 33 total units of lower income housing.	Staff disagrees. The project is consistent with the goals and policies of the General Plan Housing Element in that the project facilitates the construction of new housing units (Goal H-1) and creates more equitable and inclusive neighborhoods (Goal H-4). Consistent with Policy H-1.1 (Facilitate Infill Housing Development), the project redevelops an underutilized city-block with a higher-density infill residential development with ground-floor commercial close to transportation corridors and educational and recreational amenities. The project also diversifies the housing stock in an area of the City that is comprised largely of single-unit residential and smaller-scaled multi-unit and commercial developments. Construction of the project creates a more inclusive and equitable neighborhood through the expansion of housing types to meet the needs of various household sizes and income levels consistent with Policy H-4.1 (Expand Housing Types Throughout the City). In addition, while the project is located on two sites (320 Alhambra Boulevard and 3012 C Steet) listed in the 2021-2029 RHNA Housing Element Sites Inventory, the lower income capacity on remaining sites identified in the Housing Element is adequate to meet the jurisdiction's remaining low income RHNA of 13,406 for the 2021-2029 planning period without the site developing consistent with the Housing Element inventory. As the remaining sites identified in the Housing Element are adequate to meet the requirements of Section 65583.2 of the California Government Code and to accommodate the City's share of the regional housing need pursuant to section 65584, the project is consistent with the Housing Element

		even without the inclusion of 33 lower income housing units. This is identified in the No Net Loss Finding of the Staff Report.
A-8	Appellant argues that the project is ineligible for the exemption created by Public Resources Code (PRC) section 21080.66 for the following reasons:	Staff has listed and responded individually to each concern below:
	A. The project is inconsistent with applicable zoning laws and the City of Sacramento's General Plan.	See Response A-1.
	B. The project-specific Phase I Environmental Site Assessment identified Recognized Environmental Conditions (RECs) at the site, so a Preliminary Endangerment Assessment must be prepared before a project can be exempted under 21080.66.	This is incorrect. PRC Section 21080.66(c)(1)(A) establishes that a Phase I Environmental Site Assessment along with the subsequent statutory requirements including a Preliminary Endangerment Assessment and required mitigation measure to address hazardous materials (if determined applicable) are required to be a condition of approval on housing development projects utilizing the PRC section 21080.66 statutory exemption. Because a Phase I Environmental Site Assessment has been prepared for the project, the City is requiring the preparation of a Preliminary Endangerment Assessment as a condition of approval for the development, in accordance with PRC section 21080.66(c)(1)(A). As outlined in the staff report, preparation of a Preliminary Endangerment Assessment will ensure that, if needed, measures are identified to adequately mitigate the existence of any release of a hazardous substance on the site and/or any potential for exposure of future occupants to significant health hazards from any nearby property or activity to levels required by current federal and State statutory and regulatory standards included in the EPA risk-based screening levels, the California Code of Regulations and the Health and Safety Code (Title 17 (CCR), Title 23 (CCR), California Human Health Screening Levels, and HSC 25123.3). Documentation of cleanup of any identified environmental conditions to appropriate residential-standards shall be submitted to the City prior to issuance of a certificate of occupancy to ensure the appropriate remediation efforts are completed. As such, implementation of the project's conditions of approval adequately address hazardous materials consistent with the PRC section 21080.66 statutory exemption.
A-9	The appellant argues that the project is not eligible for an exemption and must be subjected to a full CEQA review.	A full CEQA review has been conducted. As outlined in the staff report the project qualifies for a statutory exemption pursuant to PRC section 21080.66.
A-10	Appellant argues that because the project is subject to a full CEQA review and references the Initial Study/Mitigated Negative Declaration previously prepared	The appellant is correct that an IS/MND was originally prepared for the project in accordance with the CEQA. A Notice of Availability / Intent to Adopt Mitigated Negative Declaration was previously released identifying the document

	for the project. The appellant asserts that this Initial Study/Mitigated Negative Declaration (IS/MND) suffers from numerous fatal defects and attaches a comment letter submitted on the IS/MND during the public review period.	was available for a 30-day public review and comment period from April 23, 2025 to May 23, 2025. However, the Governor signed Assembly Bill (AB) 130 on June 30, 2025, which immediately enacted a new CEQA statutory exemption under PRC section 21080.66 for qualifying urban infill housing projects, streamlining approvals for infill housing developments. As outlined in the staff report, the project was reviewed against the requirements of PRC section 21080.66(a) and it was determined that there is substantial evidence to demonstrate the project satisfies the necessary conditions to exempt the project from further environmental review in accordance with the CEQA. Thus, the previous IS/MND and associated public comments on the document are not relevant to the project.
A-11	Appellant argues that the CEQA requires an EIR must be prepared for any project that *"may have a significant effect on the environment"* under PRC section 21151(a). The appellant further argues that an EIR must be prepared *""[I]f a lead agency is presented with a fair argument that a project may have a significant effect on the environment, the lead agency shall prepare an EIR even though it may also be presented with other substantial evidence that the project will not have a significant effect"* per CEQA Guidelines section 15064(f)(1).	As outlined in the staff report and Response A-9 and A-10, the project is statutorily exempt under PRC section 21080.66 from further environmental review in accordance with the CEQA. As such, the previous IS/MND is not relevant and an EIR is not required for the proposed project.
A-12	Appellant states the project would generate approximately 102,920 gallons of sewage per day, which would be discharged into the City's CSS, which is already over capacity. Appellant argues this is a specific, adverse impact upon public health and safety and that Government Code section 65589.5(d)(4) provides that a lack of adequate water or wastewater facilities can be grounds to disapprove a project.	See Response A-7C. As outlined in the staff report, the Department of Utilities has conditioned the entitlements to require the developer to provide a sewer study to evaluate whether the CSS main connecting to the project has sufficient capacity. If not sufficient, the developer would be required to upsize sewer mains as needed. The proposed project would also subject to pay applicable development impact fees for the increased sewer impacts. Implementation of these conditions of approval ensures increases in sewer flow are mitigated, resulting in no specific adverse impacts upon public health and safety.
A-13	Appellant states the project would generate approximately 960,000 additional vehicle trips per year on City streets that are already congested and dangerous, resulting in a specific, adverse	No specific, adverse, or quantifiable public health and safety impact related to vehicle trips is caused by the development The proposed project's intensity is allowed under the City's zoning and the 2040 General Plan Land Use Diagram and this intensity was studied and assumed under the 2040 General Plan Master EIR. For this reason, the project did not trigger the need for further traffic analysis by Public Works

	impact upon public health and safety.	staff. It is also noted that the vehicle trips per year metric cited is a non-industry standard metric. A standard metric is Average Annual Daily Traffic (AADT). Based on Institute of Transportation Engineers (ITE) Trip Generation Manual, trip generation values show the entire project generates approximately 1,879 new daily trips.
A-14	Appellant requests the City Council reverse all project approvals.	Staff is recommending the City Council deny the third-party appeal of the project thereby upholding the Planning and Design Commission's decision to approve the project subject to findings of fact and conditions and approval.

B. Casa Loma Terrace – East Sacramento Neighborhood Association Appeal

Section	Summary of Issue	Staff Response
B-1	Appellant states significant health and safety concerns would be created by approving a project beyond the 35-foot height limitation in the Alhambra Corridor SPD.	See Response A-1.
B-2	Appellant states that under the HAA, local governments are not prohibited from requiring a housing project to comply with objective, quantifiable, written development standards, conditions and policies.	Staff agrees with this statement.
B-3	Appellant identifies the project is out of scale with adjacent residential neighborhood and argues that there is no reasonable finding that the project is objectively in scale given the physical characteristics of the adjacent residential development.	See Responses A-6 and A-7B.
B-4	Appellant argues the height of the project conflicts with the policies of the 2040 General Plan related to scale and neighborhood form, including Policies LUP-6.3 (Variety of Housing Types), LUP-6.4 (Neighborhood Form), LUP-8.11 (Neighborhood Transitions).	See Responses A-1, A-7A, and A-7B.
B-5	Appellant states that nothing about the project can be considered a transition, when a 68-foot-tall building is surrounded by one- and two-story residences	Staff disagrees. The project incorporates substantial building step-backs into the upper floors along Alhambra Boulevard and portions of D Street and Chinatown Alley, which comply with the transitional and maximum height requirements in the underlying C-2 zone. As outlined in the staff report, the design of the mixed-use development, even with the

	and commercial buildings under 35 feet.	additional height, is consistent with the purpose and intent of the Alhambra Corridor SPD buffer zone.
B-6	Appellant states the project completely fails to consider the pattern or urban form of the neighborhood, and will damage, rather than contribute, to the livability.	Staff disagrees. The project is consistent with the applicable objective standards of the General Plan and SCC Title 17, including all applicable development standards of the C-2-SPD zone and the Alhambra Corridor SPD)
B-7	Appellant identifies there are three newer six story residential buildings in East Sacramento and all of them are unlike this project in that: • They are transit and pedestrian oriented; • There is no height limitation for those zones; • They are in commercially developed neighborhoods.	The issue raised is outside the purview of the city review. Staff are required to review each project against the adopted policy and regulatory documents in place at the time of an application submittal. Each site has a unique development potential based upon the applicable General Plan and zoning designations and site characteristics.
B-8	Appellant states Sacramento has the highest traffic fatalities per population compared to other peer cities in California, three times that of San Francisco.	Comment noted.
B-9	Appellant states that 57% of Sacramento's greenhouse gases are from transportation, exceeding that of the state and nation.	Comment noted.
B-10	Appellant asserts that the project is not near light rail, a major bus line, or significant office buildings and incentivizes vehicle use which negatively contributes to greenhouse gas emissions.	Staff disagrees. A high-intensity mixed-use infill development near transit service is generally associated with low vehicle miles traveled (VMT) and reducing polluting emissions. As outlined in the staff report, the project site is in an area with existing Sacramento Regional Transit bus routes, including Routes 67 and 68 at 30th and G Streets, Route 134 at Alhambra and McKinley Boulevards, and Route 30 at J and 30th Streets. Per the Sacramento Metropolitan Air Quality Management District (SMAQMD) on the project, this type of development is an important component of state and regional plans to reduce polluting motor vehicle emissions, including the Sacramento region's Metropolitan Transportation Plan and Sac Metro Air District's Sacramento Regional Ozone Attainment Plan and other plans for meeting federal and state air quality standards.
B-11	Appellant states the project will add 990,236 vehicle trips per year, 19,043 per week, up to 3,300 per day.	See Response A-13.

B-12	Appellant states that the traffic generated by the project creates a major safety problem due to the existing traffic congestion in the area. Appellant further states the area has a history of collisions.	The Fire Department and Department of Public Works have reviewed the project to confirm compliance with City Code for adequate site circulation, roadway design, emergency vehicle access, and intersection capacity. Based on their review, the traffic generated by the proposed project does not trigger the nexus for requiring the construction of additional traffic calming devices or changes to the roadway orientations. In addition, The City's Transportation Planning unit has prepared a public online tool (Crash Dashboard) to view collision data throughout the City. Based on collision data from the past 10 years, the Crash Dashboard interactive map does not support the claim of the adjacent neighborhood being a collision hot spot. Data from the last 10 years shows no severe injuries or fatalities within this study neighborhood. Only five collisions with complaint of pain or a visible injury are recorded for the last 10 years adjacent to the project site.
B-13	Appellant states the entire Alhambra Boulevard Corridor, C Street, McKinley Boulevard, H Street have a high pedestrian level of stress and Alhambra Boulevard is a bike and pedestrian route for school-aged children.	Staff agrees. Bike lanes and pedestrian infrastructure have been identified in the City's approved *Streets For People: Sacramento's Active Transportation Plan*. For this reason, the Department of Public Works has conditioned the project to construct pedestrian enhancements along Alhambra Boulevard and 30th Street in the form of curb extensions and a high-visibility crosswalk.
B-14	Appellant argues the project solidifies permanent, large-scale, intensive reliance on vehicle transportation, and should be scaled back to reduce this in order to comply with the General Plan and applicable zoning.	See Responses A-7B and B-10. Further, the project as designed is consistent with the applicable objective standards of the General Plan and SCC Title 17, including all applicable development standards of the C-2-SPD zone and the Alhambra Corridor SPD. Thus, staff do not find it reasonable to require the project reduce the scale and project density as it would be contrary to State laws such as the HAA (Government Code section 65589.5) and other related statues.
B-15	Appellant notes that this area has some of the highest pollution burdens in the City and argues the project has an irresponsible, unacceptable, and permanent carbon footprint.	See Response B-10.
B-16	Appellant states the 2040 General Plan contains a number of vision statements, policies, and specifics regarding greenhouse gas emissions, pedestrian safety, and vehicle accidents and the appellant argues the project is inconsistent with nearly all of them.	See Responses A-1, A-7A, B-10, and B-12.

B-17	Appellant argues the project design does not comply with the Alhambra Corridor SPD and Supplemental Design Guidelines since the development is not *"similar in scale and architectural character to adjacent single-family residences.*	See Responses A-4 and A-7B.
B-18	Appellant argues the project design does not comply with General Plan Policies LUP-4.8 (Buildings that Engage the Street) and LUP-6.5 (Established Neighborhoods).	See Staff Response A-7A.
B-19	Appellant states the design is inconsistent with the adjacent community because residences do not have entrances or garages opening to the neighborhood.	This is not an objective standard applicable to the development.
B-20	Appellant states the project fails to integrate with the neighborhood inconsistent with the 2040 General Plan which emphasizes neighborhood streets should function as a vital public space where neighbors interact and new development should strengthen the sense of place	Staff disagrees. The project includes a ground floor commercial component at the corner of D Street and Alhambra Boulevard with an expansive storefront system to activate the pedestrian realm. Staff find the inclusion of a ground floor commercial component creates a new space for the neighborhood to interact. Additionally, the project is required to provide pedestrian enhancements along Alhambra Boulevard and 30th Street in the form of curb extensions and a high-visibility crosswalk increasing the safety and functionality of the public right-of-way.
B-21	The appellant states the project is inconsistent with General Plan Policy LUP-6.2 (Range of Residential Development Intensities) since no senior or affordable housing is included.	Staff disagrees. Consistent with General Plan Policy LUP-6.2, the project contributes to the variety of housing available in the area to meet the needs of various household sizes and income levels. Specifically, the project establishes a higher-density mixed-use development in an area concentrated with single-unit and smaller-scaled multi-unit developments. This policy does not require the inclusion of senior or affordable housing.
B-22	The appellant states the project is inconsistent with General Plan Policy LUP-6.1 (Neighborhood as a Basic Unit) since the project bears no resemblance to the historic Craftsman, Period Revival and Bungalow styles	See Response A-7A. Further, the General Plan and Alhambra Corridor Supplemental Design Guidelines do not define objective development standards for a development to comply with historic Craftsman, Period Revival and Bungalow design styles in this area.
B-23	Appellant states the City previously released an Initial Study / Mitigated Negative Declaration for public review and comment but chose to exempt	See Response A-11.

	the project instead of revising the IS/MND.	
B-24	Appellant states the project does not qualify for the PRC section 21080.66 statutory exemption because AB 130 was passed on June 30, 2025 which was after the project was submitted to the City in February 2024 and the IS/MND was released for public review and comment in April 2025.	See Response A-10. Further, the City of Sacramento, as the CEQA lead agency, determined the project is exempt from further environmental review in accordance with the California Environmental Quality Act. The prior IS/MND prepared for the project is not applicable or a consideration of the CEQA review.
B-25	Appellant states that no discussion of AB 130 provisions were included in the IS/MND and affected parties were not notified of its application until the February 12, 2026 hearing.	See Response B-24. Further, staff identified the intended CEQA determination on the Notices of Public Hearing for the project consistent with the Permit Streamlining Act and City Code.
B-26	Appellant states the project cannot utilize the exemptions created under AB 130 because AB 130 requires *"as one of the conditions for certification of a housing development project, that it not result in any net additional emission of greenhouse gases."*	This section of AB 130 is not applicable and not associated with the statutory exemption under PRC section 21080.66.
B-27	Appellant states that the project cannot rely on AB 130 (i.e., PRC section 21080.66 statutory exemption) due to the site containing hazardous materials.	See Response A-8B.
B-28	Appellant identifies concerns that the CSS is not designed to handle the sewage generated by the project.	See Responses A-7C and A-12.
B-29	Appellant claims that a project of this size should be offset by 7.5 acres of parkland and that a payment of a parks impact fee does not mitigate this impact.	This is incorrect. The State authorizes local governments to require developers of residential subdivisions to dedicate land or pay in-lieu fees for park and recreational facilities, which is codified in SCC chapter 17.512. This project does not involve the subdivision of land which would trigger the need to dedicate land (or pay in-lieu fees) for parks and recreational facilities under SCC chapter 17.512 (Parks and Recreation Facility). Instead, the project is subject to SCC chapter 18.56 (Development Impact Fees) , which requires the payment of a Park Impact Fee on the development of new dwelling units, non-residential development, and changes in a use of a building or structure to provide funding for the design, construction, installation, improvement, and acquisition of

		park facilities (see SCC section 18.56.220). As outlined in the staff report, the project is required to pay this Park Impact Fee which adequately addresses park impacts under City Code.
B-30	Appellant asserts the project has substantial population impact on the adjacent neighborhood.	This is not true. The project site is designated RMU in the City's General Plan and located within the C-2-SPD zone and Alhambra Corridor SPD. The City's General Plan building intensity standards (Maps LUP-6, -7, and -8) establish a minimum of 20 dwelling units per acre (du/ac) and a floor area ratio (FAR) range of 0.3 to 4.0. The project is not subject to any maximum density standards. At 147 du/ac and a FAR of 3.37, the project is consistent with the building intensity standards established by the General Plan and C-2-SPD zone. As such, the proposal is consistent with the anticipated buildout of the site and would not result in overcrowding of the area with people.
B-31	Appellant states the project does not provide enough vehicle parking which will result in increased greenhouse gas emissions due to residents circling for parking.	See Response B-10. Further, under the 2040 General Plan, the City no longer requires a minimum number of vehicle parking spaces (Policy LUP 4.14) and no minimum parking for vehicles is codified in parking regulations established in SCC chapter 17.608. For this reason, staff does not find it reasonable or necessary to impose additional parking requirements on the proposed development.
B-32	Appellant claims the HAA does not apply to the project since the units are not affordable.	See Response A-1.
B-33	Appellant states the applicant did not offer enough community outreach to solicit feedback on the developments, which runs contrary to other East Sacramento developments.	Staff understand that a joint community meeting with the East Sacramento Community Association, East Sacramento Preservation, and the Casa Loma Terrace-East Sac Neighborhood Association was held on June 5, 2025, where the applicant team listened to community feedback and City staff answered general questions about the planning process. While other recent developments in East Sacramento may have held more robust outreach efforts, the absence of applicant-lead community outreach is not an adequate basis for denial under the HAA.
B-34	Appellant asserts the project does not represent responsible growth and requests the project be returned to the applicant so it can be redesigned.	Staff disagrees as the proposed development is consistent within the generally anticipated buildout for the site under the General Plan and consistent with the objective development standards of the General Plan, C-2-SPD zone, and the Alhambra Corridor SPD. Staff is requesting City Council deny the appeal and uphold the Planning and Design Commission's approval determination.

PRESERVATION
SACRAMENTO

PO Box 162140, Sacramento CA 95816 – preservation.sacramento@gmail.com - PreservationSacramento.org - (916)604-8320

Sean deCourcy, Preservation Director
City of Sacramento, Community Development Department
300 Richards Blvd. Sacramento CA 95811

April 2, 2024
RE: P24-007, Alhambra Redevelopment Site, 324 Alhambra Boulevard—Public Comment

Dear Director DeCourcy,

The Board of Directors of Preservation Sacramento wishes to comment on the Alhambra Redevelopment Site, proposed for most of the block encompassing C Street, D Street, 30th Street, and Alhambra Boulevard. While we support the approach taken to integrate the brick facades of the industrial building along C Street and Alhambra Boulevard into a new apartment building, we have concerns about demolition of the three buildings on 30th Street for a parking garage.

The proposed project demolishes much of the Pureta Sausage/Mary Ann Bakery complex, but retains its exterior walls. While facadism is sometimes considered a less than ideal approach, retention of the exterior walls while building a much taller building within the older envelope seems like a worthwhile compromise to bring a significant amount of housing to the site while retaining present historic features.

The project also proposes demolishing three buildings, two of which are single-family homes in the Craftsman bungalow style and a Minimal Traditional building that appears to have been converted to 3 or 4 apartments, to make way for a parking structure and utility enclosure. While these buildings are not located within the boundaries of an existing historic district, they are indistinguishable from similar buildings of comparable construction era and architectural style that are listed as contributors to nearby historic districts along Alhambra Boulevard; to the best of our knowledge, no detailed surveys of this part of East Sacramento have ever been done. Demolishing them could constitute a loss of eligible historic resources, as well as a loss of existing older housing *currently in use by tenants*.

We recommend a potential compromise: the parking structure's capacity of approximately 300 cars is twice the required parking capacity (0.5 spaces per unit) for the proposed use. Instead of a 300 car garage, we encourage the applicant to consider a smaller garage of 150-200 spaces. The resulting savings of approximately $3-5 million (based on an estimate $30,000 cost per space for structured parking) would facilitate adding Accessory Dwelling Units to the existing homes, increasing housing supply while retaining the historic buildings and providing sufficient tenant parking for the project.

Sincerely,

William Burg
President, Preservation Sacramento Board of Directors

CIVIC THREAD

April 19th, 2024

Zach Dahla
City of Sacramento Community Development Department
300 Richards Boulevard, 3rd Floor
Sacramento, CA 95811

RE: Alhambra Redevelopment (P24-007)

Dear Mr. Dahla,

I hope this letter finds you well. On behalf of Civic Thread, I extend our sincerest gratitude for considering our organization to route the new development project. We are thrilled about the prospects of the proposed six-story, mixed-use development encompassing 302 multi-unit dwellings, commercial space, and parking. It represents a significant opportunity for community growth and enhancement. We commend the inclusion of historic Chinatown Alley in the development plan. Preserving such cultural landmarks is crucial for maintaining our community's identity and heritage. Additionally, we appreciate the development's strategic proximity to parks, trails, and American Parkway, offering residents convenient access to recreational spaces and amenities.In addition, the attributes above, we would like to recommend the following:

Affordable Housing
We propose allocating 15% of the units as affordable rental units.Developers can capitalize on reducing their developer impact fees by including 15% of the units as affordable rental units. Affordable housing fosters community diversity and ensures equitable access to housing opportunities.

Traffic and Safety Measures
We urge the implementation of traffic-calming measures, such as crossing improvements and roundabouts, to enhance resident safety. Additionally, we suggest reducing car parking spaces in favor of promoting alternative modes of transportation like biking and walking.

Bike and Car Parking
It is essential to ensure that the parking garage is accessible for bike storage, encouraging sustainable transportation options. We also express concerns about the parking lot's placement near the pool area and recommend planting pollution-filtering trees to mitigate environmental impacts.

Bicycle Storage Concerns
We strongly recommend providing a ground-level bike storage room to accommodate residents' needs. Our primary concern lies with the request to waive the requirement for a ground-level

bike room and instead provide in-unit bike wall racks. In contrast, this strategy may effectively spread the required space for bike storage across existing uses rather than replacing some units with a bike storage room or reconfiguring the ground-level floor plan. I strongly recommend that the developers to provide a ground-level bike storage room. While the number of spaces offered would ideally utilize a one parking space to one dwelling unit ratio, we would support the provision of 93 bicycle parking spaces in the storage room and the provision of in-unit bicycle wall racks for the 39 ground-level units.

At Civic Thread, we are dedicated to promoting physical activity and creating environments that support active transportation, such as walking and bicycling. Our efforts aim to improve public health, air quality, and neighborhood cohesion and foster sustainable local economies.
Thank you for considering our input and your commitment to community development. We look forward to working together and creating a vibrant, inclusive, and sustainable living environment for all.

Sincerely,
Abayomi Brownfield
Project Coordinator
Civic Thread

SACRAMENTO METROPOLITAN
AIR QUALITY
MANAGEMENT DISTRICT

April 19, 2024

Zach Dahla, Associate Planner
City of Sacramento Community Development Department
300 Richards Boulevard, 3rd Floor, Sacramento, CA 95811

Subject: Alhambra Redevelopment (P24-007)

Dear Zach Dahla:

Thank you for providing the Sacramento Metropolitan Air Quality Management District (Sac Metro Air District) with the opportunity to review the Alhambra Redevelopment project, a request to demolish three single-unit dwellings and all but portions of the exterior facades of the on-site industrial building previously used as a bakery to redevelop the site with a six-story, mixed-use development consisting of 302 multi-unit dwellings, 2,400 square feet of ground floor commercial, and 344 parking spaces on a 2.19-acre site near the intersection of C Street and Alhambra Boulevard. We offer the comments below to benefit air quality and public health.

Sac Metro Air District commends this walkable, relatively high-intensity mixed-use infill development near frequent transit service as associated with low vehicle miles traveled (VMT) and resulting polluting emissions. This type of development is an important component of state and regional plans to reduce polluting motor vehicle emissions, including the Sacramento region's Metropolitan Transportation Plan and Sac Metro Air District's Sacramento Regional Ozone Attainment Plan and other plans for meeting federal and state air quality standards. We support pedestrian improvements for this project in addition to the standard 5-foot minimum width separated sidewalks, including pedestrian bulb-outs at intersections, mid-block crossings, and enhanced pedestrian crossing signals and crosswalk treatments.

Mobile Source Air Toxics
This project's location near a high-volume roadway (Business 80) would pose increased health risk to its future tenants. Sac Metro Air District's Mobile Source Air Toxics Protocol mapping tool shows an increased cancer risk of approximately 131 in a million at the project site, in addition to the existing background risk, resulting from exposure to vehicle Toxic Air Contaminant (TAC) emissions from nearby mobile TAC sources, such as motor vehicles traveling on Business 80.

Note, however, that the modeling tool does not take into account building requirements that reduce pollution concentrations, such as the California Building Energy Efficiency Standards (BEES) stipulations for MERV 13 filtration in new residential construction, or site features such as shrub and tree plantings. For more information, please visit the Sac Metro Air District's Mobile Source Air Toxics Protocol, available on our website.

Sac Metro Air District's Landscaping Guidance for Improving Air Quality Near Roadways (Landscaping Guidance) provides specific recommendations on using vegetation to reduce public health impacts from

motor vehicle emissions, including the selection, placement, planting, and care of tree and shrub species on project sites. The Landscaping Guidance is available on our website and includes a list of vegetation species that can help reduce public health impacts from motor vehicle emissions.

- Sac Metro Air District commends the placement of the parking structure at the west of the site, creating separation between the residential units and Business 80. *We recommend that project landscaping incorporate tree and shrub species in the Landscaping Guidance planting list at the western edge of the site to the full extent feasible.*

Urban Heat Island Effect
According to the Capital Region Transportation Sector Urban Heat Island Mitigation Project (UHI Project), the urban heat island effect presents a serious challenge for our region. Developed areas in Sacramento range 3 to 9 degrees Fahrenheit warmer than surrounding areas, which results in decreased air quality and associated public health impacts. The urban heat island results from the conversion of undeveloped land to developed land. Recommendations are listed below, on strategies to reduce urban heat island effect impacts, that are consistent with both the UHI Project report and the City Climate Action Plan.

- Utilize certified cool roofs, consistent with recommendations for solar reflectance and thermal emittance in the California Building Energy Efficiency Standards Table 170.2-A for the Sacramento Climate Zone (Zone 12), as applicable. The Cool Roof Rating Council provides a product directory of roofs.

- Incorporate trees to shade new and existing pavements and structures to the full extent feasible. It is not clear whether existing street trees will be intact after construction. Ensure continuous tree shading to the full extent feasible on all walkways including public sidewalk. This measure would create healthier, more hospitable pedestrian conditions in the project area, consistent with the project's low-VMT development type. Greater neighborhood tree canopy has been correlated to improvement of overall human health and supports healthy pedestrian and other active transportation.

Carbon-Free Energy
Policies in the City's adopted Climate Action & Adaptation Plan call for transitioning buildings to all carbon-free energy such as renewable electricity, and away from energy such as natural gas. Further, buildings without natural gas provide substantial public health benefits. Homes in which gas stoves are used have nitrogen dioxide concentrations 50 to 400% higher than homes with electric stoves. Using a gas stove and oven for just an hour often leads to indoor air pollutant levels that exceed California's ambient air quality standards. This exposure to nitrogen dioxide can cause respiratory effects. For example, in homes with gas stoves, children are at increased risk of having asthma by 42%.

- To develop a healthier project and ensure that the project is consistent with measure E-2 of the City's adopted Climate Action & Adaptation Plan, Sac Metro Air District recommends that it be designed and constructed without natural gas infrastructure.

Demolition
Due to the health risks posed by public exposure to asbestos, demolition and renovation of existing buildings is subject to Sac Metro Air District Rule 902, to limit asbestos exposure during these

activities. Sac Metro Air District staff is available to review notifications and answer asbestos related questions, either by emailing asbestos@airquality.org, or calling 279-207-1122.

Environmental Review & Construction
Please reference Sac Metro Air District's Guide to Air Quality Assessment in Sacramento County for any environmental review that may be required for this project. Projects undergoing any environmental review must implement Sac Metro Air District Basic Construction Emission Control Practices, also available on our website, to help avoid significant construction-related air quality impacts. All projects are subject to Sac Metro Air District rules and regulations in effect at the time of construction. Please visit our website to find a list of the most common rules that apply at the construction phase of projects.

Conclusion
Thank you for your attention to our comments. If you have questions about them, please contact me at mwright@airquality.org or (279) 207-1157.

Sincerely,

Molly Wright

Molly Wright, AICP
Air Quality Planner / Analyst

c: Paul Philley, AICP, Program Supervisor, Sac Metro Air District

February 3, 2026

Planning and Design Commission
Zachary Dahla, Senior Planner

RE: Support for Alhambra Residential Project P24-007

Dear Planning and Design Commission:

The East Sacramento Community Association (ESCA) supports the Alhambra Residential Project (former Maryann's Bakery) as presented.East Sacramento, like much of Sacramento, is experiencing intense competition for a limited number of homes. Residents see this every day in rising rents, bidding wars, and the difficulty workers and families face when trying to live near their jobs, schools, and transit. This project meaningfully responds to that reality by adding new housing choices in a connected, infill location, and provides housing choices for those desiring to enjoy the benefits of all East Sacramento has to offer.

More homes in established neighborhoods are not an accident of market forces alone: they are the result of deliberate policy decisions to allow housing where people already live, work, and travel. The Alhambra Residential Project reflects recent state and local policy choices intended to address the housing shortage by allowing modestly scaled apartment buildings in corridors like Alhambra Boulevard. These choices are changeable, and this project demonstrates how thoughtful policy can expand opportunity rather than preserve scarcity. The project is supported by General policy that supports healthy, livable, and complete neighborhoods (LUP-6).

By delivering 336 new homes, the project increases availability and choice for renters and future homebuyers, giving people more leverage and reducing the pressure that drives displacement. Providing additional housing options, especially multifamily homes near jobs, transit, and services, helps protect existing residents by easing competition for older housing stock and supporting working families who rely on proximity to East Sacramento.

The project's design balances added housing with neighborhood context. Step-backs along Alhambra Boulevard reduce the visual impact and avoid a walled effect, while still allowing enough homes to make the project viable. Thus, we believe the criteria for issuance of the Conditional Use Permit is met. Importantly, the development provides 322 on-site parking spaces for 336 units, even though state law would allow significantly less. This reflects a good-faith effort to address neighborhood concerns while maintaining the number of homes needed to meaningfully contribute to housing availability. Reducing unit count through additional step-backs would likely reduce both housing options and parking, undermining the project's benefits.

This project advances a future where East Sacramento can remain inclusive, vibrant, and accessible to the people who work here, raise families here, and contribute to the community every day. For these reasons, ESCA urges the Planning and Design Commission to approve the Alhambra Residential Project.

Sincerely,

Tricia Stevens

Tricia Stevens, President
East Sacramento Community Association
president@eastsacramento.org

Feb 11, 2026

City of Sacramento
915 I Street
Sacramento, CA 95814

Re: Proposed Housing Development Project "Alhambra Redevelopment Project" (P24-007)

To: rblunt.sac@gmail.com; rkutect@gmail.com; pdc.nicolina@gmail.com; DovKadinPDC@gmail.com; lamas.pdc@gmail.com; pdc.larrylee@gmail.com; kreed.pdc@gmail.com; nybosacpdc@gmail.com; commissiondeb@gmail.com; erinreschke.pdc@gmail.com; ginjerthompson.pdc@gmail.com; pdc.eyeung@gmail.com

Cc: zdahla@cityofsacramento.org; kfelix@cityofsacramento.org; planning@cityofsacramento.org

Dear Sacramento Planning Commission,

The California Housing Defense Fund ("CalHDF") submits this letter to remind the City of its obligation to abide by all relevant state laws when evaluating the proposed 332-unit housing development project at 320, 324, and 350 Alhambra Boulevard; 3005 and 3012 C Street; and 301, 311, 315, and 317 30th Street, which is 100% affordable at the moderate income level. These laws include the Housing Accountability Act ("HAA") and AB 130.

The HAA provides the project legal protections. It requires approval of zoning and general plan compliant housing development projects unless findings can be made regarding specific, objective, written health and safety hazards. (Gov. Code, § 65589.5, subds. (d), (j).) The HAA also bars cities from imposing conditions on the approval of such projects that would render the project infeasible (*id.* at subd. (d)) or reduce the project's density (*id.* at subd. (j)) unless, again, such written findings are made. As a development with at least two-thirds of its area devoted to residential uses, the project falls within the HAA's ambit, and it complies with local zoning code and the City's general plan. The HAA's protections therefore apply, and the City may not reject the project except based on health and safety standards, as outlined above. Furthermore, if the City rejects the project or impairs its feasibility, it must conduct "a thorough analysis of the economic, social, and environmental effects of the action." (*Id.* at subd. (b).)

Furthermore, the project is eligible for a statutory exemption from environmental review under AB 130 (Pub. Res. Code, § 21080.66). Caselaw from the California Court of Appeal affirms that local governments err, and may be sued, when they improperly refuse to grant a project a CEQA exemption or streamlined CEQA review to which it is entitled. (*Hilltop Group, Inc. v. County of San Diego* (2024) 99 Cal.App.5th 890, 911.)

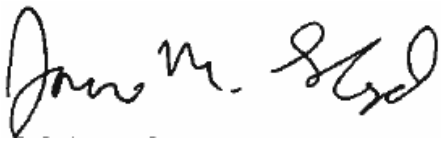
Of note, the project includes two sites (320 Alhambra Boulevard and 3012 C Steet) listed in the 2021- 2029 Housing Element Sites Inventory, which planned for 33 lower-income units on the sites.

As you are well aware, California remains in the throes of a statewide crisis-level housing shortage. New housing such as this is a public benefit: by providing affordable housing, it will mitigate the state's homelessness crisis; it will increase the city's tax base; it will bring new customers to local businesses; and it will reduce displacement of existing residents by reducing competition for existing housing. It will also help cut down on transportation-related greenhouse gas emissions by providing housing in denser, more urban areas, as opposed to farther-flung regions in the state (and out of state). While no one project will solve the statewide housing crisis, the proposed development is a step in the right direction. CalHDF urges the City to approve it, consistent with its obligations under state law.

CalHDF is a 501(c)(3) non-profit corporation whose mission includes advocating for increased access to housing for Californians at all income levels, including low-income households. You may learn more about CalHDF at www.calhdf.org.

Sincerely,

Dylan Casey
CalHDF Executive Director



James M. Lloyd
CalHDF Director of Planning and Investigations

February 10, 2025

Planning & Design Commission
City of Sacramento
300 Richards Blvd., 3rd Floor
Sacramento, CA 95811

RE: Letter of Support – 324 Alhambra Redevelopment Project

Chair and Members of the Planning & Design Commission:

On behalf of Downtown Sacramento Partnership (DSP), a property-based improvement district representing 102 blocks in our downtown core, I am writing in support of the 324 Alhambra Redevelopment Project, scheduled for consideration on February 12, 2026.

This project represents the type of development Sacramento should continue to prioritize as part of a comprehensive livability strategy - one rooted in a sustainable development pattern, a compact urban footprint, and a balanced, connected community. Thoughtful infill along established corridors like Alhambra Boulevard strengthens existing neighborhoods and reinforces the long-term vision for thriving centers linked by transit and supported by walkable infrastructure.

Reinvestment in underutilized sites is essential to achieving that vision. By directing growth inward - rather than outward - the City can make more efficient use of existing infrastructure, reduce pressure to expand into outlying areas, and support climate and transportation goals. Housing located near employment centers, commercial services, and transit corridors fosters daily activity that benefits both residents and local businesses while reducing vehicle miles traveled.

Adding new homes in established areas also contributes to neighborhood vitality and economic resilience. A balanced mix of housing and neighborhood-serving retail helps sustain small businesses, supports a more active public realm, and creates the density necessary for frequent transit and enhanced mobility options. Projects like this help create complete communities where residents can live, work, and access services within close proximity.

Importantly, this proposal demonstrates that increased housing capacity and neighborhood compatibility are not mutually exclusive. The project advances infill housing in a manner that respects surrounding context while meaningfully contributing to Sacramento's housing production goals.

For these reasons, we respectfully urge the Planning & Design Commission to approve the 324 Alhambra Redevelopment Project.

Sincerely,

Michael T. Ault
Executive Director
Downtown Sacramento Partnership

February 12, 2026

Planning & Design Commission
City of Sacramento
300 Richards Blvd., 3rd floor
Sacramento, CA 95811

Re: 324 Alhambra Redevelopment Project – Letter of Support

Chair and Members of the Planning & Design Commission,

On behalf of the Sacramento Metro Chamber and our member businesses across the six-county Capital Region, we are writing in support of the 324 Alhambra Redevelopment Project, scheduled for consideration on February 12, 2026. The Sacramento Metro Chamber strongly supports projects that encourage private investment, increase housing supply, and reinforce the long-term economic vitality of Sacramento's established commercial corridors.

The proposed development represents a productive reuse of an underutilized site and advances the City's goals related to infill development, housing near employment centers, and efficient use of existing infrastructure. As the State of California continues to emphasize housing production in urban areas, projects like the 324 Alhambra Redevelopment Project demonstrate how thoughtful private investment can help meet those objectives while contributing to local economic growth.

We are encouraged by the project's emphasis on high-quality design, compatibility with the surrounding neighborhood, and preservation of the historic character of the existing building frontage. This balanced approach supports new housing and neighborhood-serving retail while respecting community context and long-standing local assets.

For these reasons, the Sacramento Metro Chamber respectfully urges the Planning & Design Commission to approve the 324 Alhambra Redevelopment Project. Approval of this project would send a positive signal that Sacramento welcomes responsible investment and supports well-designed infill projects that contribute to both housing goals and economic opportunity.

Sincerely,

Robert W. Heidt Jr.

Robert W. Heidt, Jr.
President & CEO
Sacramento Metropolitan Chamber of Commerce

February 12, 2026

Planning & Design Commission
City of Sacramento
300 Richards Blvd., 3rd floor
Sacramento, CA 95811

Re: 324 Alhambra Redevelopment Project – Letter of Support

Chair and Members of the Planning & Design Commission,

On behalf of Midtown Association, a property-based improvement district representing more than 1,300 properties and businesses working to make Midtown the center of culture and creativity in Sacramento's urban core, we write in support of the 324 Alhambra Redevelopment Project.

This project aligns with the City's adopted land use and housing policies that prioritize infill development along established corridors and the efficient use of existing infrastructure. Reinvesting in underutilized sites like this helps advance complete neighborhoods where residents can live near jobs, services, and transit, while reinforcing long-term planning goals for the Central City.

Sacramento continues to face significant housing challenges, particularly in established neighborhoods where demand far outpaces supply. By adding 336 new homes in a connected corridor location, the project expands housing choice and helps ease pressure on existing housing stock, supporting neighborhood stability and long-term inclusivity.

The project reflects a thoughtful approach to neighborhood context, incorporating step-backs along Alhambra Boulevard and on-site parking that exceeds what state law would require, while maintaining the scale needed to meaningfully contribute to housing availability.

For these reasons, Midtown Association supports approval of the 324 Alhambra Redevelopment Project.

Sincerely,

Emily Baime Michaels
Executive Director, Midtown Association

February 12, 2026

Planning & Design Commission
300 Richards Blvd., 3rd floor
Sacramento, CA 95811

Re: Alhambra Redevelopment Project (P24-007) - Letter of Support

Dear Planning & Design Commissioners,

On behalf of House Sacramento, an all-volunteer local grassroots organization dedicated to ending the housing crisis, we strongly support the staff recommendation to approve the residential redevelopment project at 324 Alhambra Blvd (along with the other contiguous parcels included in the project). We're thrilled that this project would add 332 infill apartments (and potentially 500 new residents!) to a high-resource neighborhood in East Sacramento, along with 2,400 square feet of neighborhood-serving retail that will benefit the whole community. Future residents will enjoy close access to great local schools, businesses, and McKinley Park, along with the shady, bikeable road network of East Sac and Boulevard Park, easy multimodal commute options to downtown jobs (including an RT bus line), and all the thoughtful design elements and onsite amenities that the developer is bringing to 324 Alhambra.

Critically, this project will also bring down average housing costs across the region, as new supply naturally puts downward pressure on market rents. And in 2026, market rents in even the most desirable parts of Sacramento are far below the monthly costs of homeownership (for the few existing homes that even hit the market, given the lock-in effects of the current interest rate environment), which means that this project opens up entirely new housing opportunities for young families and early-career workers in East Sac. We'll see more picnics in the park, more kids on the playground, more patrons at our beloved local businesses, fewer cars on the freeway, and more tax dollars staying in our community rather than flowing out to distant suburbs. While we clearly have the demand to welcome far more than 500 new neighbors to East Sac, the supply of housing has not kept up, and many Sacramentans who would love to live here are simply locked out.

Projects like 324 Alhambra are exactly what we need to unwind the housing crisis, bring density and opportunity to established, desirable neighborhoods like East Sac, and stick behind the General Plan promise to build a more sustainable, affordable, and inclusive Sacramento.

Toward housing for all,

Michael Turgeon
President
House Sacramento

Zachary Dahla

From: Brandenburger, David <David.Brandenburger@nmrk.com>
Sent: Thursday, February 12, 2026 1:47 PM
To: rkutect@gmail.com
Cc: Zachary Dahla; District 4; Mayor
Subject: Mary Ann's Bakery - P24-007

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Mr. Chase,

My name is David Brandenburger and I'm a commercial real estate broker with Newmark. In addition to my day job, my family owns the three-story office building across the street from the subject property at 225 30th St. I am a founding member of the Midtown East Sacramento Alliance, MESA. and while I'm not writing on behalf of the organization, as a person that is involved in this area, especially cleaning up the homelessness around this site and under the Capital City freeway, I do believe it gives me credibility. I was also the real estate broker that sold the former Westfield downtown Plaza to JMA, who in turn sold it to the Kings to become DOCO and the Golden 1 Center, and while there was a lot of opposition to that project, it is now a showcase for Sacramento. My background as an urban planning an environmental engineering major from MIT has definitely helped set my vision for good development.

When my family purchased the office building at 30th and C Street, I saw the Mary Ann's Bakery property as a vacant blighted site. I reached out to the ownership and was able to get a listing on the project and marketed it for about five years. Unfortunately, originally we had some environmental issues we had to finalize, the site has been deemed clean and has a closure letter from the regional water quality board. And then we ran into Covid, which scared people from development. I have moved onto other projects since then, but remain in 100% support of the plans the ownership has for it now. It is deeply concerning that neighbors, many of whom may own houses in the area but don't even live in Sacramento, have organized a highly funded campaign to oppose this project. I hope you can see the forest through the trees and that anyone that is not raising their hand in opposition is most likely for the project.

This is the type of housing that this area, Sacramento, and California in general needs to solve our lack of supply. Thank you in advance for your approval of this project. Please let me know if you have any questions.

Sincerely, David

David Brandenburger
Managing Director

NEWMARK
980 Ninth Street, Suite 2500
Sacramento, CA, 95814
t 916.569.2310
m 916.508.8440
David.Brandenburger@nmrk.com
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Corporate RE License #00832933

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Zachary Dahla

From: Kristine Shultz <kristineshultz@yahoo.com>
Sent: Thursday, February 12, 2026 2:36 PM
To: Zachary Dahla; District 4; rkutect@gmail.com; Mayor
Subject: SUPPORT - Redevelopment Project P24-007

Hi, I live at 28th and E Street. I have owned my house for 28 years. I'm writing in support of the redevelopment project located between 30th and Alhambra and C and D Streets.

We need more affordable homes in midtown the only way to meet the new state standards is to build more housing!

The way to mitigate traffic concerns is to build more close to downtown, not push new housing out to the suburbs.

Retail, restaurants, and small businesses survive on foot traffic. Adding housing:

- Revitalizes struggling commercial corridors
- Stabilizes local tax bases
- Activates streets at night and on weekends
- Makes downtown safer through consistent activity

Please vote yes on this project. Thank you for your consideration.

Kristine Shultz

Zachary Dahla

From: Enoch Yeung <pdc.eyeung@gmail.com>
Sent: Wednesday, February 11, 2026 6:38 PM
To: Stacia Cosgrove
Subject: Fwd: PDC 2/12/2026 Item #2 - Support for Alhambra Redevelopment Project

Sent from my iPhone

Begin forwarded message:

> **From:** Alyssa Lee <alyssa.dabichi.lee@gmail.com>
> **Date:** February 11, 2026 at 1:32:26 PM PST
> **To:** DovKadinPDC@gmail.com, rblunt.sac@gmail.com, rkutect@gmail.com, PDC.Nicolina@gmail.com, lamas.pdc@gmail.com, pdc.larrylee@gmail.com, kreed.pdc@gmail.com, nybosacpdc@gmail.com, Commissiondeb@gmail.com, erinreschke.pdc@gmail.com, ginjerthompson.pdc@gmail.com, pdc.eyeung@gmail.com
> **Cc:** Strong SacTown <strongsactown@gmail.com>
> **Subject: PDC 2/12/2026 Item #2 - Support for Alhambra Redevelopment Project**
>
> Hello, Planning & Design Commissioners,
>
> My name is Alyssa Lee and I'm a resident of District 4. I live near 23rd and C Street, a few blocks due west of this project. I am a member of Strong SacTown, a local community group that works to improve the livability of Sacramento for all neighbors. I support the Alhambra Redevelopment Project as I would love to have more neighbors in Sacramento, and this location is one of the best places to add more housing. Building more housing in walkable neighborhoods like midtown and East Sac means more people can live in Sacramento and have the choice to use sustainable transportation, like walking and biking, and to live without the expense of a car. This development would be a great improvement over the current deactivated vacant buildings.
>
> I have 4 requests for the Planning & Design Commission to require of the developer:
>
> - I echo Preservation Sacramento's reuest to reduce the parking garage to 150-200 spaces to save money and to preserve the 4 existing occupied homes. This project should not displace any current tenants. I agree with Ben Menzie's ecomment that more parking leads to higher development costs, higher rents, higher emissions, and also induces more driving in general and in surrounding neighborhoods.
> - I echo Civic Thread's request to add a ground-floor bike storage room, in addition to the in-unit wall racks. Larger bikes suitable for families, people with disabilities, or people who use cargo bikes to replace their cars are very popular in this neighborhood, and should be welcomed and accommodated in this development.
> - I echo Civic Thread's request to make 15% of the units affordable and to take advantage of the impact fee waiver.

- Work with the City and Caltrans District 3 to add east-west crosswalks on 30th & E Streets and to make crossing 30th and the freeway undercrossing safer for people walking and biking.

I want to appreciate the letters of support written by Preservation Sacramento, Civic Thread, and East Sacramento Community Association who recognize the importance of adding housing stock in this neighborhood and have also offered very reasonable compromises to further improve this project.

I would like to share this excerpt from East Sac Community Association's letter: "East Sacramento, like much of Sacramento, is experiencing intense competition for a limited number of homes. Residents see this every day in rising rents, bidding wars, and the difficulty workers and families face when trying to live near their jobs, schools, and transit. This project meaningfully responds to that reality by adding new housing choices in a connected, infill location, and provides housing choices for those desiring to enjoy the benefits of all East Sacramento has to offer. ... By delivering 336 new homes, the project increases availability and choice for renters and future homebuyers, giving people more leverage and reducing the pressure that drives displacement. Providing additional housing options, especially multifamily homes near jobs, transit, and services, helps protect existing residents by easing competition for older housing stock and supporting working families who rely on proximity to East Sacramento."

More foot traffic for local businesses, reduced competition for homes, and more people who can work close to where they live without driving and adding to traffic are just three reasons why East Sac residents can benefit greatly from this project.

Thank you in advance for your consideration.

--
Alyssa Lee (she/her/hers)
Schedule a meeting: calendly.com/alyssalee
I live on the Miwok and Nisenan land known as Sacramento, CA (Pacific Time Zone).
<Alhambra-Redevelopment-Project-Letter-Civic-Thread.pdf>
<Alhambra-Redevelopment-Project-Letter-ESCA.pdf>
<Alhambra-Redevelopment-Project-Letter-Preservation-Sac.pdf>

Zachary Dahla

From: Lana Wong <lanabellewong@gmail.com>
Sent: Thursday, February 12, 2026 7:31 AM
To: Zachary Dahla
Subject: 324 Alhambra Boulevard, Sacramento

Follow Up Flag: Follow up
Flag Status: Flagged

Hello Zach,

My family lives in East Sacramento and we're writing in support for the redevelopment of the property at 324 Alhambra Blvd. The City and the State need more climate supportive infill housing, so this addition to the neighborhood is much appreciated! However, we would recommend the City Council, planners, and developers consider slight modifications to the project. As the site is near multiple amenities that are walkable and it is near existing transit, we would encourage the reduction of parking. This reduction in parking could translate into more space for additional units and reduce cost to the developer. We would highly recommend the the project include some level of affordability. While more housing is helpful, we also need more housing at all income levels. The City of Sacramento is building a lot of infill housing, but is missing the opportunity to build more affordable units through inclusionary requirements, which we would encourage.

Thanks for your consideration of these comments.

The Wongs

Zachary Dahla

From: Nora <nbrackbill@gmail.com>
Sent: Thursday, February 12, 2026 8:58 AM
To: Zachary Dahla; rkutect@gmail.com; District 4; Mayor
Subject: Support for Alhambra Corridor Redevelopment Project

Follow Up Flag: Follow up
Flag Status: Flagged

Hello,
I am a resident of District 4 (95816) and I support the proposed housing project, Alhambra Corridor Redevelopment Project P24-007. We need more housing in the city. The opponents to this project may be vocal and organized, but that doesn't mean they represent the majority of your constituents, who support more housing. I live in District 4 and I support this project and other housing projects.
Thank you,
Nora Brackbill

Zachary Dahla

From: Peter Saucerman <psaucerman@gmail.com>
Sent: Thursday, February 12, 2026 2:41 PM
To: Zachary Dahla
Subject: Alhambra Blvd Apartments - In Favor

Hi Zach -
I understand that a significant apartment project is coming before the Planning Commission tonight - I want to voice my approval and support for this project. I am familiar with the location at the North end of Alhambra - as a bakery, then a high end stereo sales company, a home for artists and various other pursuits. The commercial need for this block has long since passed, while the critical need for more (affordable) housing in Sacramento has never been more dire.This block at the North end of Alhambra and up against the Capitol Corridor freeway would be well used for this project. East Sacramento is a very desirable address, but very few opportunities exist for younger people to live in this area. A new, well designed apartment complex buffering the freeway and close to McKinley Park would be an ideal re-use for this long vacant site. Allowing more than 300 people to live relatively economically and enjoy the benefits of McKinley Park - I can't think of a better turn around. I heartily support this project.

Peter Saucerman
2911 Riverside Blvd.
Sacramento, CA

Zachary Dahla

From: RJones <rjones@uuma.org>
Sent: Wednesday, February 11, 2026 10:18 PM
To: Zachary Dahla; rkutect@gmail.com; Mayor
Subject: Support for Redevelopment Project P24-007

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Planning & Design Commission Members and Staff:

I read in the Bee and on KVIE's Abridged about the Planning Council vote on the East Sac 300-unit apartment building. And today I got an alarmist flyer in the mail from Save East Sac. I am sorry a work meeting will keep me from attending the meeting on February 12.

I am a homeowner near East Sacramento, just south of Folsom. I guess that's why they sent me the alarmist flyer, so I feel that I may speak about this. I support this project.

We need more housing in Sacramento. I wish this project were not only for market-rate apartments, but for mixed-rate apartments. ButI think having some affordable units would generate even more alarm by the property holders than the current plan. In any case, it's better than no apartments at all. The vacant warehouses need to be replaced.

I am sure close neighbors are concerned about traffic and more people. However, I recall that our experience with the Gio apartments on the site of a vacant factory at Stockton and T Street has been NOT a great increase in traffic, contrary to the opposing voices of some of its neighbors.

I am concerned about the high cost of housing in Sacramento. The upward pressure on rents continues to put many individuals and families with children on the brink of losing their homes, of becoming unhoused. I would be in favor of even more of this kind of infill development in our local area.

Yours truly,
Roger Jones

--
Rev. Dr. Roger Jones (he, him, his)

--
Rev. Dr. Roger Jones (he, him, his)

Zachary Dahla

From: William Ostroff <stroff2@hotmail.com>
Sent: Thursday, February 12, 2026 9:45 AM
To: Zachary Dahla; rkutect@gmail.com; District 4; Mayor
Subject: Support for P24-007 – Alhambra Corridor Redevelopment

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Mayor, Councilmember, and Planning Commissioners,

I live in East Sacramento and I support the Alhambra Corridor Redevelopment Project (P24-007).

Sacramento has a housing shortage, and major corridors like Alhambra (close to jobs, services, and transit) are the right place to add homes rather than pushing growth outward and increasing sprawl. Adding housing in established areas supports walkability, local businesses, and shorter trips.

Councilmember Pluckebaum's campaign website states, "...I'm passionate about amplifying our efforts to increase housing options for residents and families of all income levels." I agree, and this project is a practical example of adding housing options in an appropriate corridor location in his District.

Concerns about traffic and infrastructure should be addressed through conditions and mitigation, not by rejecting infill housing. Infill growth can reduce regional driving compared to greenfield development, and it's reasonable to require measures that manage impacts. If sewer capacity and stormwater runoff are concerns, those are solvable engineering issues. Projects can be conditioned to include on-site stormwater management and to pay required fees or improvements that support system capacity over time.

I urge you to evaluate this project and future projects based on housing need, smart growth, and feasible mitigation.

Thank you,

William Ostroff, PE

Zachary Dahla

From: Paul Skillin <skillinp@gmail.com>
Sent: Thursday, February 12, 2026 4:34 PM
To: Zachary Dahla
Subject: Support for Alhambra Corridor Redevelopment Project, P24-007

Hello Mr. Dahla,

I am a 36-year-old resident of East Sacramento, living in a house that I rent at 3014 1/2 E St. I received a mailer from a group called Save East Sac about the Alhambra Corridor Redevelopment Project, P24-007. **I am in strong support of this project,** but I will not be able to attend tonight's meeting. I assume there will be a lot of local opposition to this project. The house I am renting is between two two-story apartments, and there's a 3-story apartment on the other side of one of them. There is absolutely no issue with the height of any of these buildings, and their being even taller would make no difference. Given the fact that this project would take the entire lot, I do not understand why there is opposition to the height, in particular, of this building.

I would like to own a house of my own someday, but because there is not enough housing available at all levels, I cannot do this. I assume that the city would not allow the building of a project like this without proper infrastructure, and so I am not worried about that at all. **Please do not pay attention to the NIMBY types who are sure to show up tonight**.

Thank you for your time,
Paul Skillin

Zachary Dahla

From: Nick Fogg <foggnich@gmail.com>
Sent: Thursday, February 12, 2026 9:24 PM
To: Zachary Dahla; rkutect@gmail.com
Subject: Support for P24-007

Good evening Misters Chase and Dahla, I'm writing a note in support of the six story redevelopment project on Alhambra, P24-007. Don't let the NIMBYs convince you east sac opposes density.

As an east sac homeowner who frequently uses McKinley Park, I think the neighborhood would benefit from more density. The regions has countless low-rise, sprawling neighborhoods. It'd be nice to have a few denser neighborhoods which can support the amenities that density brings.

Best wishes,
Nick Fogg

Zachary Dahla

From: AS <as.miscetc@gmail.com>
Sent: Thursday, February 12, 2026 6:52 PM
To: Zachary Dahla; rkutect@gmail.com; District 4; Mayor; info@saveeastsac.org
Subject: Save East Sac - by building a lot of housing

Hello,

I received a mailer today about a project to build a 6-story housing unit in East Sac. The letter proposed I object to the project, but I would like to write IN SUPPORT of it. There's nothing in that space. If anything, even more housing should be built there. As a local renter who has no hopes of ever owning a house in the area, anything to lower housing costs would be welcome. It's also very loud in that area, so maybe a new tall building would block some of the street noise for those lucky enough to own a house there.

As to concerns about the increase in car traffic - I absolutely agree that MORE INFRASTRUCTURE should be build in conjunction with the project. I cycle whenever possible and support more protected bike lanes so everyone will feel safe. I agree that red light running is an issue - traffic enforcement for drivers should increase in the area. We should also have more frequent and reliable public transit. I can't take Amtrak to my job this month because my morning train has been cancelled for the entire month. In this time of heading towards a climate crisis, we dearly need more transit and to stop building freeways. The area of this proposed project is pretty close to grocery options and bikeable to some jobs, but hey, why not build another grocery store up there too? I'd walk there.

I can't speak to the sewage concerns in the mailer - if it's broken, fix it.

Please build more housing so more people have access to housing and jobs. Build it now. Build it fast. Let lower income people have a chance to live in East Sac. Enforce safe driving in the area, but make it more walkable too.

A midtown resident for 10+ years,
Angela Stathos

Zachary Dahla

From: Grey Monroe <greymonroe@gmail.com>
Sent: Saturday, February 14, 2026 9:33 AM
To: Zachary Dahla; rkutect@gmail.com; District 4; Mayor
Subject: Public comment in support of P24-007 (Alhambra Corridor Redevelopment Project)

Follow Up Flag: Follow up
Flag Status: Flagged

Mayor and Councilmembers, and City Planning Staff,

I'm a homeowner who lives near the proposed Alhambra Corridor Redevelopment Project (P24-007). I received a mailer from an organization calling itself "SaveEastSac.org" urging residents to oppose the project. I want to put my comments on the record: I support this development.

Sacramento has a serious housing shortage, and the consequences are visible every day - **homelessness is Sacramento's most urgent problem**. Restricting housing supply through reflexive "stop the project" opposition has been a major contributor to the situation California cities are in. When projects get delayed, reduced, or blocked over issues like building height or generalized "neighborhood character" concerns, the end result is fewer homes, higher costs, and more people pushed out or left without stable housing.

Trying to prevent housing from being built is not a responsible policy given the reality Sacramento faces right now. Blocking P24-007 would be one more decision in a long pattern that has made the housing crisis worse, and I don't support that.

Please treat this email as formal public comment in support of P24-007.

Thank you for your work and for taking the housing and homelessness crisis seriously.

Best,
— J. Grey Monroe
I & 21st
Associate Professor
UC Davis

Zachary Dahla

From: Drew Sutton <sutton916@gmail.com>
Sent: Thursday, February 12, 2026 8:30 AM
To: Mayor; District 4; Zachary Dahla; rkutect@gmail.com
Subject: Support for Residential Development at Alhambra and D

Follow Up Flag: Follow up
Flag Status: Flagged

I am a Boulevard Park resident and I wanted to write to express my support for the residential development proposed at 30th/Alhambra and D Streets along the freeway in East Sac. The defunct bakery has been an eyesore and an attractive nuisance for years, and if a lot adjacent to the freeway isn't an acceptable place for a mid-rise apartment building I'm not sure where such a place could be found. That end of the neighborhood has some nice amenities along C Street and of course with McKinley Park, and seems like a reasonable place to put more homes. It even has decent transit access. I hope that the Planning Commission will approve the application and that the City Council will reject the appeal, should one be filed.

Thanks,
Andrew Sutton
2222 H St

Zachary Dahla

From: Vince King <kingvark@gmail.com>
Sent: Wednesday, February 11, 2026 9:08 PM
To: Zachary Dahla; rkutect@gmail.com; District 4; Mayor
Subject: Support for Alhambra project (P24-007)

Hello,
I live at 32nd and C street near the proposed project with my wife and two young daughters. I fully support the project. This is precisely the type of housing choice we need closer to density and employment centers so that current and future generations can hope to afford housing in our communities. Bigger picture, we need these housing choices to support dense housing that is less impactful on resources and the climate.

Some may complain about parking. The fact is parking is abundant and easy to find on the street in our neighborhood. In my opinion, if a curbside parking space is not full, it is a waste of space that the public has already paid for (ROW, asphalt, etc.). We should fill those existing spaces. Some may complain about height. One of the higher impact/quality of life issues here is noise from the freeway. This building, particularly higher, would likely help attenuate it. I support the height. I also support better bike infrastructure and do not support any expansion to streets.
Thanks - Vince

Zachary Dahla

From: Ronnie Ormsby <sonic71789@gmail.com>
Sent: Wednesday, February 11, 2026 1:26 PM
To: Mayor; District 4; rkutect@gmail.com; Zachary Dahla
Subject: In Support of the Alhambra Corridor Redevelopment Project

Follow Up Flag: Follow up
Flag Status: Flagged

To those representing the people:

The quieter majority knows growth is necessary for a city and state to thrive. I received a letter from "Save East Sac!" opposing new housing in my neighborhood, a message diametrically opposed to what I believe our state and city needs.

Please remember that **the vast majority of people believe increasing California's housing stock is the state's and local communities' highest priority.**

Sincerely,
Ronald Ormsby
River Park Homeowner

Zachary Dahla

From: jo conger <joconger@gmail.com>
Sent: Wednesday, February 11, 2026 2:29 PM
To: Mayor; District 4; rkutect@gmail.com; Zachary Dahla
Subject: Alhambra Corridor Redevelopment

Follow Up Flag: Follow up
Flag Status: Flagged

I will be unable to attend the Planning Commission meeting on February 12th. But as a resident of East Sacramento I wanted to express my **approval** of the multi unit building proposed between 30th street and Alhambra Blvd, and C and D streets. There is a dire need for more housing in this area as well as options for people who would like to enjoy the attributes of living in East Sacramento but can not afford a $700,000 + home, like my adult children, for example. This type of housing is also attractive for those of us who at some point may no longer be able to maintain a single family home, but would like to remain in the area .

Do not let the negative Nancys sway the decision, just because one is a resident does not mean they own the surrounding area, or the future of who may have the opportunity to live within its bounds.

Thank you,

Jo Conger
916-296-5165

Zachary Dahla

From: Kyla Kelly <kjk474@gmail.com>
Sent: Wednesday, February 11, 2026 3:51 PM
To: Zachary Dahla; rkutect@gmail.com; District 4; Mayor
Subject: Redevelopment project P24-007

Dear city officials and planners,

I am writing to express my strong support of redevelopment project P24-007. Sacramento is in need to additional housing to support the growing demand. It is my hope that approving this project will support this objective.

I also see great potential for this project to beneficially replace the dilapidated, abandoned currently at the property's location. With the approval of this project, I look forward to a more aesthetically pleasing and safer neighborhood.

Thank you for considering my letter of support.

Best,
Kyla Kelly
Boulevard Park, Sacramento Resident

Zachary Dahla

From: Matteo Borge <matteojborge@gmail.com>
Sent: Wednesday, February 11, 2026 4:59 PM
To: Mayor; District 4; rkutect@gmail.com; Zachary Dahla
Subject: East Sacramento Development on Alhambra

Good evening,
I would like to commend you on the redevelopment project P24-007. Thank you for taking this project on and building more housing. It is greatly needed here and I am excited to have more neighbors in my neighborhood. I know there are NIMBYs who oppose this project, but wanted you all to know there are people living in East Sac that are for this project! Thank you!

Matteo Borge
Resident in East Sac

Zachary Dahla

From: Andrew Day <andrew1024@gmail.com>
Sent: Wednesday, February 11, 2026 6:50 PM
To: District 4; Zachary Dahla; rkutect@gmail.com; Mayor
Subject: Support for P24-007 Redevelopment Project

All:

I write to express my strong support for the proposed residential project between Alhambra Boulevard and 30th Street, and C and D Streets. This project will transform a vacant eyesore into much-needed housing and add to the vibrancy of the East Sac community.

Regards,
Andrew Day
Resident, District 4

Zachary Dahla

From: Adrianna Lucero <lucero.adrianna@gmail.com>
Sent: Wednesday, February 11, 2026 6:04 PM
To: Zachary Dahla; rkutect@gmail.com; District 4; Mayor
Subject: Support for Alhambra & C development project

Hello,

The proposed redevelopment project on Alhambra/30th & C/D, P24-007, sounds like an excellent idea. I am writing to express my strong support.

We need more housing! As a resident nearby on 27th & F, I would be excited to see an unused block turn into a home for more families. We need more options for housing in this area, so many people like me love living here, but are priced out.

Please don't let loud voices away the conversation. I heard about this project through a fearmongering mailer I received in the mail from those in opposition. I worry that people with money will dominate the discussion, rather than the vast majority of Sacramentans who are looking for more housing options, not less.

Thank you,
Adrianna
District 4

Adrianna Lucero

Zachary Dahla

From: Kirk Townsend <kirkftownsend@gmail.com>
Sent: Wednesday, February 11, 2026 6:02 PM
To: Zachary Dahla; rkutect@gmail.com; District 4; Mayor
Subject: Redevelopment project P24-007

Dear city officials and planners,

I am writing to express my strong support of redevelopment project P24-007. Sacramento is in need to additional housing to support the growing demand. It is my hope that approving this project will support this objective.

I also see great potential for this project to beneficially replace the dilapidated, abandoned currently at the property's location. With the approval of this project, I look forward to a more aesthetically pleasing and safer neighborhood.

Thank you for considering my letter of support.

Best,
Kirk Townsend
Boulevard Park, Sacramento Resident

--
Kirk Townsend, PhD, PG
kirk.f.townsend@gmail.com
559-760-5766

Zachary Dahla

From: Raja Sivamani MD MS AP <raja.sivamani.md@gmail.com>
Sent: Wednesday, February 11, 2026 8:06 PM
To: Zachary Dahla; District 4; Mayor; rkutect@gmail.com
Subject: Support for P24-007

Dear Zach, Robert, Phil, and Mayor Kevin McCarty,

I would like to voice my strong support in favor of the Alhambra Corridor Redevelopment Project P24-007

I have been a long time resident of the East Sacramento area, including living just two blocks away from this property site for over 10 year. I used to walk my dog by this property all the time and wondered when they would ever improve it. There were constant worries about squatters and drug use in the area and the buildings looked terrible. It's about time someone redeveloped this area and it will be for the better.

I received a mailer from SaveEastSac.org to try to garner my opposition. Instead, I was delighted to learn that a redevelopment was in process (thank you SaveEastSac.org) and I'm totally in support of this project. I think it will do a lot of good for the area and clean up that property that has been a source of concern for many years. In fact, I would feel safer having little children playing and walking around in that area knowing that it will be cleaned up.

Kind regards,
Raja

Raja Sivamani, MD, MS (Bioengineering), AP
Board Certified - Dermatology
Ayurvedic Practitioner
www.linkedin.com/in/rajasivamani/

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Zachary Dahla

From: Samuel Capps <samuelcapps@gmail.com>
Sent: Wednesday, February 11, 2026 7:35 PM
To: Zachary Dahla; rkutect@gmail.com
Cc: District 4; Mayor
Subject: Alhambra Redevelopment Project (P24-007)

Dear Commissioner Chase and Mr. Dahla:

I am an architect and an East Sacramento resident. I am writing in **support** of the Alhambra Redevelopment Project (P24-007). I have no professional or financial stake in or connection to this project. I am simply a citizen with expertise in this area who wants to see the best outcome for our neighborhood.

Generally, I believe the project will be a benefit to the neighborhood by strengthening the urban fabric and creating a visual and acoustic barrier to the freeway. The property is located in a transition zone between Business 80 and the single-family residences to the east of Alhambra. A mixed-use, multifamily development is ideal for this location.

That said, the project could be improved, and I encourage the Planning Commission to consider requesting the developer:

1. Reduce the massing fronting Alhambra by one story. The transition down to the scale of the single-family homes to the east is a bit harsh. However, the taller volumes, as currently designed, fronting C and D Streets are well proportioned relative to surrounding buildings and the freeway.
2. Minimize the parking ratio while providing and prioritizing walking, biking, and public transit infrastructure and amenities.
3. Design the retail space with the flexibility to accommodate a neighborhood anchor grocery store. This would serve to reduce vehicular traffic, not only from residents of the project but would also reduce traffic originating from the single-family homes to the east.
4. More completely screen the parking structure facing the freeway.

Overall, I believe this project is a net benefit to our City and to East Sacramento. **While the above changes would be highly welcome, I still believe the project has merit and should ultimately be approved.**

Respectfully submitted,

Samuel Capps
5347 M Street
Sacramento, California 95819

Zachary Dahla

From: Tevis Pieper <tevis.pieper@gmail.com>
Sent: Wednesday, February 11, 2026 6:47 PM
To: rkutect@gmail.com; Zachary Dahla; District 4; Mayor
Subject: Public Comment in SUPPORT of Alhambra Corridor Redevelopment Project (P24-007)

Dear Members of the Planning & Design Commission and City Leadership,

I am writing to express my strong support for the proposed 6-story redevelopment project at the Alhambra Corridor (P24-007). While I understand the concerns raised by some neighbors regarding scale and infrastructure, I believe this project is exactly the kind of transit-oriented, infill development Sacramento needs to meet our housing goals and climate targets.

I would like to offer the following points in counter-argument to the opposition flyers currently circulating:

1. Addressing the Housing Crisis Through Density - Sacramento is in the midst of a severe housing shortage. Adding 332 units on a single city block is an efficient use of land that provides much-needed housing supply. Maintaining a 35-foot height limit in a primary transit corridor is a missed opportunity; vertical density is the only way to accommodate growth without contributing to further suburban sprawl.

2. Transit-Oriented Development vs. Vehicle Trips - The opposition's claim of 990,000 annual vehicle trips assumes a car-centric lifestyle that ignores the project's location. This site is ideally situated for residents to utilize bike lanes, walking paths, and public transit. By placing high-density housing in the urban core rather than the outskirts, we actually reduce the total regional Vehicle Miles Traveled (VMT) and encourage a less car-dependent population.

3. Infrastructure Investment and Economic Growth - Rather than viewing our aging sewer system as a reason to stop growth, we should view this project as a catalyst for the very infrastructure upgrades the flyers demand. New developments pay significant impact fees that fund the modernization of city services. Blocking development does not fix old pipes; it merely deprives the city of the tax base needed to repair them.

4. Neighborhood Vitality and Safety - The "Mary Ann's Bakery" site has long been underutilized. This project brings eyes on the street, improved lighting, and new retail spaces that will make this section of Alhambra more vibrant and safer for pedestrians. A 6-story building is a modern, urban standard for a major corridor and serves as a necessary transition between Midtown and East Sacramento.

I urge the Commission to prioritize the long-term future of Sacramento—which must be dense, walkable, and inclusive—over the desire to maintain the status quo. Please approve the height variances and move this project forward.

Sincerely,

Tevis Pieper
Midtown C Street Resident, Sacramento, CA

Zachary Dahla

From: Brandon Soares <brandonrsoares@gmail.com>
Sent: Monday, February 3, 2025 11:44 AM
To: Zachary Dahla
Subject: P24-007

Follow Up Flag: Follow up
Flag Status: Flagged

Hello,

I'd like to support/advocate for this development if possible. I have seen nearby HOA's banding together to complain in a very NIMBY manner.

The city needs more new development to increase housing supply. Please let me know if there is anything I can do (writing, calling, attending a meeting) to provide support and an opposing voice to those who want to shut it down.

Zachary Dahla

From: Evan Johnson <ipodcastedit@gmail.com>
Sent: Tuesday, June 25, 2024 8:57 PM
To: Dylan Musgrove
Cc: Zachary Dahla; Mayor Steinberg
Subject: Re: Support for Proposal at Mary Anne's Bakery Site

Follow Up Flag: Follow up
Flag Status: Flagged

Good evening all,

This is Evan, and I wholeheartedly support Dylan's message.

Thank you,
Evan Johnson

On Tue, Jun 25, 2024, 8:54 PM Dylan Musgrove <dlmusgrove@comcast.net> wrote:

> Good evening,
>
> I am Dylan Musgrove, a local attorney and a resident of East Sacramento. I am writing to voice my strong support of the proposed apartment project on the north end of Alhambra.
>
> I was genuinely excited when I first read about this proposal in the Business Journal. I was genuinely disappointed when I found a note in my mailbox from neighborhood NIMBYs calling for organized resistance to the proposal.
>
> I live at 3109 C Street, directly across the intersection from the project site. Given my proximity to the proposal, it is safe to say that I would be strongly impacted by this proposal. Still, I believe the impacts would be overwhelmingly positive. Sacramento needs more housing, and a large project like this with easy access to parks, freeways, and the amenities of the Alhambra corridor and Midtown would be an overwhelmingly positive addition to our housing inventory. We *need* this proposal, yet the neighborhood NIMBYs are trying to do what they always do and stop this project from going forward.
>
> We are in this housing crisis because NIMBYs use BS arguments like neighborhood character to mislead the public into helping them maintain property values. I strongly support a wholesale rejection of NIMBYism. I support approving this project exactly as proposed by the developer. Frankly, I wish the proposal had even more units.
>
> I have cc'd Evan Johnson, a fellow resident of 3109 C Street. He agrees with me completely, and he will respond to this email thread confirming this.
>
> If you have any questions, please let me know.
>
> Cordially,

Dylan Musgrove, Esq.

Zachary Dahla

From: Heriberto Soto <heribertosotogonzalez@gmail.com>
Sent: Thursday, January 30, 2025 9:49 PM
To: casalomaeastsacna@gmail.com
Cc: Zachary Dahla
Subject: Redevelopment Project

Follow Up Flag: Follow up
Flag Status: Flagged

Good evening,

I received your flyer regarding the concerns expressed by the redevelopment project on 324 Alhambra Blvd. I did wonder where the outcry was for the McKinley Village Self Storage space built on McKinley Village Way. Did we need another storage unit?

I do hope this redevelopment project is built and brings in more residents, coffee shops and restaurants to this community. I congratulate the efforts of Zach Dahla and the City of Sacramento.

A resident in East Sac.

heriberto

Zachary Dahla

From: Steven Menconi <steven@plantdomaine.com>
Sent: Thursday, January 30, 2025 3:22 PM
To: Zachary Dahla
Subject: Project No. P24-007

Follow Up Flag: Follow up
Flag Status: Flagged

Hello Zach:

We live off of C street are excited to a see new development project planned for the abandoned Mary's bakery warehouse at Alhambra and C street. This is welcome news for this currently blighted block and we would like to hear more about what is planned for this site.

Will there be retail or restaurants along with the apartments? When will groundbreaking occur? When is completion projected?

Though you are no doubt receiving negative feedback regarding this project, all of my neighbors and friends are happy to see a new development project at this site.

Please keep us posted and thank you,

Steven Menconi, Partner

foliate.org

steven@plantdomaine.com
If you think we've earned it, we'd greatly appreciate a quick review on Google.
https://review.foliate.org/

ESP, Inc., PO Box 191763, Sacramento, CA 95819

February 4, 2026

City of Sacramento

Planning and Design Commission

915 I Street

Sacramento, CA 95814

RE: **Project Number P24-007** (Alhambra Redevelopment Project)

Dear City of Sacramento, Planning and Design Commissioners:

East Sacramento Preservation, Inc. (ESP) is a Sacramento Neighborhood Association that is writing in opposition of the proposed development of **Project number P24-007** (Alhambra Redevelopment Project), at Alhambra and C and D Streets.

The ESP board has reviewed a brief update of the project. It shows that now more units have been added and fewer parking spaces on site. This means more cars will be flowing into already narrow and congested neighborhood streets for their parking needs. I am assuming that each unit will have a minimum of 2 cars. This translates to about 500-600 cars without designated or available onsite parking spaces will overflow into the contiguous neighborhoods.

While on traffic, these same cars will add to the already congested and backed up traffic waiting to get onto the East bound Business-80 freeway at the on-ramp at 30th and E Streets. Presently we are seeing traffic stacked from 30th street backed onto McKinley Blvd to Alhambra Blvd. and wrapping around the intersection onto the north side of Alhambra from McKinley Blvd. What are the traffic engineers saying about this impaction?

The other major concern about this project is the lack of height restriction to 3 stories high in keeping with the Alhambra Corridor Special Regulations and Restrictions Code (cited below). Remember these "infill" projects are to be "in keeping with the existing residential neighborhoods. How is a residential development of 6-stories complementary to single family one-storied small residential homes?

17.420.020 Alhambra Corridor special regulations and restrictions.

B. Residential preservation transition buffer zone.

1. General rule. Except as provided below, development located within 300 feet of a residential zone (measured from the street centerline) shall not exceed 35 feet in height. This restriction is intended to establish a buffer zone to protect residential neighborhoods from visual intrusion by new development that is out of scale with the adjacent residential neighborhood.

2. Exception. The planning and design commission may approve a conditional use permit allowing additional height, provided that the height may not exceed the limits established by the applicable base zoning chapter. To approve the conditional use permit, the planning and design commission must find that the development will not be out of scale with the adjacent residential neighborhood. An example where the intent of the buffer zone is maintained while allowing additional height is a development incorporating design features or step-backs that reduce the walled effect on adjacent smaller-scaled residential development.

ESP wants to be included in all correspondence and information regarding the Mary Ann's Bakery Project (P24-007). Also, ESP would like to be informed of any community outreach meeting that may be planned by the developer or City of Sacramento for this project. Please email to martinpalomar@yahoo.com and wrldwdwil9@gmail.com

How is this P24-007 in Keeping with the Code?

ESP would like a response from you regarding our stated concerns.

Respectfully,

Martin Palomar *Will Green*

East Sacramento Preservation, Inc.

Martin Palomar, Pres. / martinpalomar@yahoo.com

Will Green, M.D. Treas. / wrldwdwil9@gmail.com

Zachary Dahla

From: Anne Davis <annedavis312@gmail.com>
Sent: Wednesday, June 26, 2024 8:58 PM
To: Zachary Dahla
Cc: casalomaeastsacna@gmail.com
Subject: Project proposed for Alhambra Blvd.

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Zach,

I am writing about the proposed six story apartment building to be constructed at Alhambra Blvd. in the old Mary Anne's bakery building.

I am very much in favor of developing the block of Alhambra Blvd. between C and D Streets. It has been empty for years and is an eyesore as well as fostering homeless camps and crime. It would be wonderful to have some housing built there that would add to the character of the neighborhood instead of having an abandoned building that gets more decrepit each year. I only live four houses away from that corner so I know.

The building being proposed however is not at all in keeping with the neighborhood! We are one and two story homes and a six story behemoth of a building would be totally out of line for our area. There have been many other units built near here that are much more in line with the neighborhood, for example the homes at I and J on Alhambra. The project being considered is way out of scale.

I only recall one meeting about a year and a half ago by the developer. We stood on the corner in the cold and were told about it. Since then, nothing. Why? I would like to be added to the list of people to be notified about the project. The people who live here need to be considered and our input requested so that something can be built that will fit the space and feel of the area. I reiterate, I am not against building housing but it's got to be right. This project is not!

Anne Davis

Zachary Dahla

From: cbdesign@surewest.net
Sent: Saturday, June 29, 2024 4:15 PM
To: Zachary Dahla
Cc: Mayor Steinberg; Jocelyn Navarro
Subject: 'Maryann Bakery Site' on Alhambra Blvd.

Follow Up Flag: Follow up
Flag Status: Flagged

Hello,
I am writing you all to comment on the proposed 302 apartments for the Maryann Bakery Site.

While *we all agree the city needs more housing*, I am happy to have someone develop this site into residential housing while being sensitive to the Casa Loma Terrace neighborhood.

Outreach:
As a resident of McKinley Park, I have never been notified of any outreach by the developer, nor for a request for a variance ! Due to the proposed height and massing, neighbors should be notified and have input.
All other developments that have been built in and around East Sac have had neighborhood input, and are better because of it.

Design: The city's Alhambra Corridor Special Planning District (SPD) requires that new development *preserve the neighborhood scale and character*.
I would like the developer to come back with a plan that *fits within the zoning* and is sensitive to scale, massing and character of the Casa Loma Terrace neighborhood. The proposed design looks so random – like a hospital or student dormitory! Surely the developer can do better than this.

Height:
I believe at *68 feet tall it is WAY too tall* for this site and will overbear neighboring homes. The city's zoning code for this area is 35 feet tall max. The proposed plan is ***almost twice the height*** of the existing city zoning code for this area.

Sewer:
While the vault installed in McKinley Park *has helped* the flooding in and around McKinley Park the winter, *it does not eliminate flooding*. I have first hand experience with the vault at max capacity, and flooding still occurring on Santa Ynez Way and Park Way. With the combined sewer system we have in place, adding an estimated 500+ more people to this combined system puts the existing neighborhood at more risk of flooding. Please let me know your solution.

Thank you for listening and acting to develop this project into an *appropriate addition* to our vintage neighborhood.

Claudia Bordin, CID

Zachary Dahla

From: E M S <whereselke@hotmail.com>
Sent: Monday, July 1, 2024 6:58 AM
To: Zachary Dahla
Subject: Maryann's Bakery Redevelopment project

Follow Up Flag: Follow up
Flag Status: Flagged

I have grave concerns about the proposed redevelopment of the Mary Anns Bakery Redevelopment project on Alhambra between C and D Streets.

It is completely out of character for this historic residential neighborhood.

The height and scope is not in keeping with current restrictions, and traffic and parking will be a nightmare for existing residents if the project goes forward in its present form.

Traffic on C Street is already way too high, and this project in its proposed version will effectively ruin the neighborhood.

I propose a scaled down version of 3 stories with at least 1 parking space for every resident as most people have a car.

Also the architectural renderings I have seen completely mis-state the character of the neighborhood.
They show 30th and D streets as 4 lane streets which they are not!
They also show a large number of 2 story homes which don't exist. This is a blatant lie and attempt to misguide.

I am not against a redevelopment. Just not on the proposed scale.

I also want to see the City hold public hearing with neighbors close to the property to inform them and hear their concerns. Why have there been no public meetings or announcements of the project?
It is clear to me that this is an illegal and nefarious attempt to skirt the project through without anyone noticing.

I would like to meet with you to discuss this further. As a resident my property and quiet enjoyment will be severely impacted if this project goes through in its present form.

It is your duty as a city representative to address my concerns.

I look forward to meeting with you.

Elke Schlosser
916.817.9574

Zachary Dahla

From: jose hernandez <jjcmhv@gmail.com>
Sent: Saturday, June 29, 2024 8:02 PM
To: Zachary Dahla
Subject: Proposed Building on Alhambra Blvd between C and D streets

Follow Up Flag: Follow up
Flag Status: Flagged

Mr. Dahla,
This letter concerns the proposed 6 story apartment building on Alhambra Blvd. AKA "Mary Ann's Bakery site.
Many of us who've lived in this neighborhood for many years are strongly against this high density, high-rise project.We are not opposed to the development of the site, this plan however is totally out of scale for this neighborhood.
The impact from traffic, parking, noise and density would forever affect the character and quality of life of this neighborhood. Questions about the current sewer system, public transportation and local school enrollment capacities are also of concern to us.
Has an environmental impact report been submitted?. Will some units be reserved for seniors and low income renters?
I and many of my neighbors look forward to discussing this planned proposal with you at a neighborhood meeting site.
Please add my email to the list of people who want to be notified on all upcoming public meetings you have planned.

Thank You.

Jose Hernandez

Zachary Dahla

From: Laura Goldhammer <lauragoldhammer@gmail.com>
Sent: Sunday, June 30, 2024 5:45 PM
To: Zachary Dahla
Subject: Concerns RE Development @ Alhambra & 30th, btwn C & D Streets

Follow Up Flag: Follow up
Flag Status: Flagged

Hello Mr. Dahla,

I'm reaching out to express my concerns and opposition to the proposed housing/retail development between Alhambra & 30th, and C & D Streets. Please add me to the list of people who are notified about this project.

My husband and I live on C Street, less than a block away from the site, and we are concerned about the size and scale of this development, not to mention the lack of outreach and engagement on the part of the developers.

We consider ourselves to be pro-growth and pro-development, and know that there is a great need for building new housing in Sacramento.

This development is NOT the way to go. It is a proposed SIX STORIES, 300+ apartments, and an estimated occupancy of roughly 450 people. However, the plans only include 344 parking spaces, and no indication for additional parking for the ground level retail spaces.

Furthermore, the development lists a building height of 68 feet, when the city zoning code for buildings in this area is only 35 feet.

My understanding is that the developers have requested an exception to the Alhambra Corridor Special Planning district, and I urge (beg?) that this NOT be approved. This development will NOT "preserve the neighborhood scale and character" but drastically alter it for the worse.

Even from the renderings of the project, it is clear that the developers have no understanding or respect for the neighborhood - they are inaccurate and misleading (30th street is not 4 lanes, there are nowhere near that many 2-story homes in the neighborhood, D street is NOT that wide).

Again, we are not opposed to development on this site - this particular project is simply too large and dense and places too much of a burden on the parking, traffic, and infrastructure (including sewage) in our neighborhood.

Please do not approve the exception and allow it to move forward. We would also be interested to learn more about what we can do and who we can contact to continue to advocate against this project.

Thank you for your time and attention.

Laura Goldhammer
C Street Resident

Zachary Dahla

From: larry larrypilgrim.com <larry@larrypilgrim.com>
Sent: Wednesday, June 26, 2024 6:27 AM
To: Zachary Dahla
Subject: Mary Anne Bakery site proposed development - Alhambra and D

Follow Up Flag: Follow up
Flag Status: Flagged

Mr. Dahla,

Will you please add me to the list of people to be notified regarding the above-referenced proposed development?

I own and live in the house at 400 Alhambra Blvd, (the corner of Alhambra and D) directly across from the proposed apartment complex. My office is located at 30th and C, adjacent to the proposed development.

I have mixed feelings about this project. I think something other than the abandoned factory would be great and great for the neighborhood. This project, as proposed, is too high and does not have enough parking.

I have 4 windows that face North, directly across the street from the proposed apartments. My back and side yard also face the proposed apartments. No only would I lose all notions of privacy, I would literally be living in the shadow of the building.

I understand from the developers that they need the building to be as large as proposed in order to make it economically feasible for them, but the parking and privacy issues need to be addressed.

Would the City be willing to make street parking available to only homeowners, not the apartment dwellers? Would the developers pay for me to construct a parking area in my back yard? Can I get a variance to build a 12-foot privacy fence on the North side of my house, at the developer's expense? These custom-tailored accommodations are probably not realistic, but without them, the abandoned factory is preferable. Why not tear it down and put in a park or something?

To cram that hideous behemoth of a building in between single-family, one-story homes a block from one of the City's most beloved parks, is not appropriate.

Very truly yours,

Larry Pilgrim

916-424-0400 Office

916-496-0210 Cel

Zachary Dahla

From: Mary Coronado <merryhln@gmail.com>
Sent: Thursday, June 27, 2024 12:28 PM
To: Zachary Dahla
Subject: Alhambra Redevelopment Project P24-007

Follow Up Flag: Follow up
Flag Status: Flagged

Hello Zach,
Yesterday, many concerned neighbors met regarding the Alhambra project at the old Mary Ann's Bakery on Alhambra and C&D Streets. We've always felt fortunate to be on the borders of East Sac and Midtown, however living two blocks from McKinley Park connects me to my East Sac neighborhood. I would hate to see this proposed apartment complex impose or have any negative impact at all on our East Sac neighborhood. If anything, they should be a good neighbor and add to our neighborhood with additional sidewalk lighting and raised crosswalks to and from McKinley Park as the foot traffic will increase.

As you know, we've had two big projects in East Sac (McKinley Village and Sutter Park) which are the standard for new growth. Let's all agree to sustain and maintain this for our East Sac neighborhood. The current city zoning code for buildings on our block are 35 feet in height. My understanding is the developer is asking for a waiver to build at 68 feet. This is 6 stories high! Also, the preservation of character of our neighborhood is lost in design. It looks like the old Sutter Hospital! I'm for growth, but let's get it right.

Lastly, I'm not sure why the City is not working with the neighbors to allow input or have the opportunity to ask questions. Therefore, I'm requesting the City of Sacramento gather citizen feedback through a local community meeting. We should have the opportunity at the minimum to do this as it will take everyone working together to make our City a better place to live.

Thank you.
Mary and Alex Calvario
3137 C Street
23 Year Residents

Zachary Dahla

From: Andrew Gates <amcalgates@gmail.com>
Sent: Tuesday, July 9, 2024 10:07 AM
To: Zachary Dahla
Subject: Concerns regarding P24-007

Follow Up Flag: Follow up
Flag Status: Flagged

Good Morning Mr. Dahla,

My name is Andrew Gates and I live at 3135 D Street, a historical landmark 4 houses down from the development proposed in P24-007.

I'm sure you've received letters from my neighbors as well, so I'll try to keep this short - I have serious reservations regarding the plans as they currently are, and would kindly request the city take the following concerns into consideration:

Issue: the height of the building - at six stories and 68 feet in height, this building will:
- be nearly double the limit allowed by the current zoning
- be 50% taller than the vast majority of new developments I've seen while driving around Midtown, Downtown, and North Sacramento
- dramatically detract and distract from the quaint historical neighborhood in which it's being built

Request: Limit the development to 4 stories, just like the majority of new Midtown and North Sac developments I see while driving around. I am in favor of housing, and I am in favor of it in my own backyard, but six stories is such a dramatic contrast to the surrounding neighborhood. I think it's important to take the context in which a new construction is being built into account.

Issue: the city is apparently giving away the alley - which is owned by the city and in turn we the taxpayers - with no recompense.

Request: The city needs to not gift our land to a wealthy developer, and it needs to communicate with the taxpayers and voters what benefit they are receiving in return for that land. Currently the city is cutting valuable programs that aren't **that** expensive - public pools, parks, and bus rides for kids. We **clearly cannot afford** to just give away assets, even as small as this alley.

Issue: Parking. The proposal does not include enough parking.

Request: I am aware that the city cannot force the developer to provide sufficient parking. I am somewhat ok with that, but at the bare minimum we need a bus line nearer to us that runs more than twice a day to make it feasible for our new neighbors to have one or zero cars. Given that I also made it clear above that the city is short on funds, I would propose once again that the developer help pay for this problem that they are directly causing.

Ultimately, this development will introduce negative externalities to the surrounding neighborhood, and as far as I can tell nothing is being done to mitigate them. As a person who has the power to help mitigate them, I ask that you please wield that power on behalf of not just my neighborhood, but also the city taxpayers and voters.

Thank you,
Andrew Gates
3135 D Street

Zachary Dahla

From: James Conant <jdc5683@gmail.com>
Sent: Monday, July 8, 2024 9:20 PM
To: Zachary Dahla
Cc: casalomaeastsacna@gmail.com
Subject: Proposal to Develop the Mary Anne Bakery site

Follow Up Flag: Follow up
Flag Status: Flagged

I would like to be kept informed of the recent development proposal for the site of the former Mary Anne Bakery. This proposal as currently envisioned is out of character with this part of the greater McKinley Park neighborhood. Our neighborhood is a cluster of old, mostly small, single family homes. The proposal is grossly over-sized and inconsistent with the Alhambra Corridor plan. It is way too high, appears to have no street set-backs and will greatly add to parking congestion that is already prevalent in the neighborhood. As envisioned it would be better placed down near the corner of Folsom and Alhambra Boulevard among similar sized buildings or near the light rail line where it could further support that system.

Jim Conant

332 32nd Street

Zachary Dahla

From: Joseph Kehrt <jkehrt@yahoo.com>
Sent: Sunday, July 7, 2024 5:59 PM
To: Zachary Dahla
Cc: casalomaestsacna@gmail.com
Subject: Proposed Project at the corner of Alhambra and D Street, Sacramento. 95816

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Zach,

I am writing about the proposed six story apartment building to be constructed at the corner of Alhambra Blvd. and D Street in the old Mary Anne's bakery building.

The people in our neighborhood are very much in favor of developing the block of Alhambra Blvd. between C and D Streets. It has been empty for years and is actually an eyesore as well as fostering homeless camps and crime. It would be wonderful to have some housing built there that would work with and add to the character of the neighborhood instead of having an abandoned building that gets more decrepit each year. I live on the next block of D Street so this project impacts me and my neighbors a lot. We are close knit, friendly very eclectic bunch of people. Many of us have lived here several decades. It's a great community, very accepting of people of all walks of life and all identities and we're proud of that. .

The building being proposed however is not at all in keeping with the neighborhood! We are one and two story homes. Having a six story behemoth of a building would be totally out of line for our area and could potentially ruin living conditions for those of us who have lived here so long as well as the young folks who have joined us in recent years. There have been many other units built near here that are much more in keeping with the neighborhood, for example the homes at I and J on Alhambra. The project being considered is way out of scale.

I only recall one meeting about a year and a half ago by the developer. It was very uncomfortable and extremely poorly conducted but I was there as were a lot of people from the neighborhood. We stood on the corner in the cold and were told about it. It was not a discussion. Since then, nothing. Why? I would like to be added to the list of people to be notified about the project. The people who live here need to be considered and our input requested so that something can be built that will fit the space and agree with the character feel of the area. I reiterate, I am not and we as a neighborhood are not against building housing but it's got to be right. This project is not! If this was being considered in the "Fab 40's" area the project would not be being carried out in this manner and I don't think the planning department would allow it to be. It should be the same for this neighborhood and the people who live here.

Respectfully submitted, Joe Kehrt, D Street resident

Mr. Dahla
RE: P24-007 Mary Ann's Bakery Apartments

I am writing to you on behalf of my neighbors in East Sacramento who live near McKinley Park. Below is a summary of our concerns regarding the proposed Mary Ann's Bakery Apartment site.

1. **Toxic Site**

   According to the Land Use form completed by HRGA Architects on behalf of Demas Enterprises, there are no known environmental issues with this property. However, we understand that there was a significant toxic site cleanup operation at this location not long ago. The neighborhood would like assurance that it was properly cleaned up. Who performed the cleanup, and who certified the site as non-toxic and suitable for an apartment complex?

2. **Design Guidelines**

   The Alhambra Corridor neighborhood site plan and design review guidelines checklist was completed by HRGA Architects. Mary Ann's Bakery is located at 324 Alhambra Blvd. in the Alhambra Corridor neighborhood (29th to 34th Street and W/X to A Streets), which is a special planning district (SPD) with specific regulations and restrictions. Developers must adhere to design guidelines when building in this area, including:

   - The site layout shall maintain the scale and rhythm of the existing neighborhood.
   - The design should be in scale and architectural character similar to the adjacent single-family residential structures, avoiding excessive massing.
   - The maximum height within the transition buffer zone is thirty-five feet.

   The proposed six-story apartment complex at Mary Ann's Bakery site does not adhere to these guidelines. The adjacent neighborhood consists predominantly of single-story bungalow and Tudor-style homes, with a few two-story homes. There are no structures taller than 35 feet close to this location. A modern six-story apartment complex spanning an entire city block, featuring exterior balconies and rooftop patios overlooking single-family homes, undermines the aesthetic and historical integrity of our community. While we recognize the need for more housing in Sacramento, a six-story building with 332 apartments and 322 parking spaces is unsuitable for this area. This project does not align with the City's Missing Middle Housing strategy, which aims to build a range of small multi-unit housing types, such as triplexes, fourplexes, and accessory dwelling units (ADUs), that are similar in scale to single-family houses. These housing types are intended to blend into existing residential neighborhoods. The proposed apartment complex does not maintain the scale and rhythm of this East Sacramento neighborhood.

3. **Combined Sewer Overflows**

   Mary Ann's Bakery project site is in the city's Combined Sewer System (CSS), which conveys stormwater, surface runoff, drainage, and sewage to the main treatment plants. The State Central Valley Regional Water Quality Control Board and the City of Sacramento Utilities Department work together to manage water and sewage in this area, focusing on combined sewer overflows (CSOs). In 1990, the city faced numerous overflows and outflows of sewage into the streets and rivers without notifying the proper agencies. This led to a cease-and-desist order on new development in downtown and East

Sacramento due to the poor condition of the 100-year-old sewer system. Since then, the city has been implementing temporary fixes to areas prone to flooding.

The McKinley Park 6-million-gallon sewer vault was built for this reason. However, the vault overflowed with sewage during the first rainfall in October 2021. The city then added more temporary fixes by sealing manholes and installing backflow valves. These measures ensure that the next sewer overflow will occur further down the combined sewer line and not next to the park.

The CSS long-term control plan consists of temporary fixes instead of separating the pipes for rainwater and sewage, as found in almost every other U.S. city. These temporary fixes increase the points of failure, jeopardizing the entire system during significant rainfall events. A substantial part of the utilities budget is used to maintain this antiquated system. According to the Utilities Department, the city has almost $1billion in wastewater system deferred maintenance. Emergency fixes will eventually outpace the entire Utilities Department budget. The continued construction of infill projects, high-rise buildings, ADUs, and the increase of impervious materials in East Sacramento contribute to the danger of combined sewer overflows. With climate change worsening each year, significant rainfall could cause the entire Downtown and East Sacramento area to overflow with sewage.

Mary Ann's Bakery project site is located just two blocks from McKinley Park. With 332 new apartments, a significant amount of sewage will enter the existing combined sewer system. Although there are combined sewer development fees, new development projects should not add any new sewage to the combined sewer system. While an in-line sewer storage vault is not ideal, it should be mandatory for this project site within East Sacramento.

4. **Transportation Safety**

According to the mobility element of the Sacramento 2040 General Plan, the transportation strategy should include an equitable, sustainable multimodal system that provides a range of viable and healthy travel choices for users of all ages, backgrounds, and abilities. It should reduce reliance on single-occupant vehicles, and the streets should be designed and maintained to contribute to the quality of life.

In the eight years since the City Council made a "Vision Zero" pledge to end traffic fatalities by 2027, more than 300 people have died on city streets. Vision Zero is a traffic safety philosophy that rejects the notion that traffic crashes are simply "accidents," but instead preventable incidents that can and must be systematically addressed. Through Vision Zero, the City of Sacramento and its partners are committed to creating safer streets.

The City has adopted a Transportation Demand Management (TDM) ordinance, called the Transportation Systems Management (TSM) program, which establishes requirements for employers to reduce vehicle miles traveled (VMT) and traffic congestion while improving air quality.

Mary Ann's project does not adhere to these transportation requirements. It is situated next to a very busy, smog-filled freeway area of Sacramento. This project promotes increased vehicle usage with its 322-space parking garage. East Sacramento is already

overwhelmed by traffic due to freeway congestion, leading to widespread use of arterial streets as bypass routes. Most of these arterial streets go through East Sacramento, including C Street, McKinley Blvd, H Street, and J Street. East Sacramento was once a desirable residential neighborhood where one could safely cross the street. Currently, many streets are lined with orange cones placed next to parked cars to prevent mirrors from being damaged by speeding vehicles navigating narrow streets. The safety of young children and the elderly must be a top priority in any transportation plan for this area.

The only bus line close to Mary Ann's Bakery site is SacRT #134, which runs once in the morning and once in the afternoon during school sessions, with no service on weekends. SacRT #30, located ¾ mile away on L Street, is the only other bus service. Sacramento's light rail system is over a mile away from this project on Folsom Blvd. There are no safe bike lanes near this project. Although some streets have bike lanes, there are no continuous bike lanes in this area due to the narrow streets. There is barely enough room for two cars to pass with parked cars on both sides of the streets. Bike lanes are often obstructed by garbage cans once a week. In the fall and winter months, bike lanes are filled with leaves and debris from trees. Crossing Alhambra Blvd. and 30th Street is especially difficult due to several busy freeway entrances and exits at E (McKinley Blvd.) and H Street. During rush hours, traffic backs up from 30th Street to nearly 39th Street, with cars frequently running red lights and stop signs due to congestion. Traffic safety deteriorates each year due to increasing housing construction, infill units, large downtown events, and inadequate public transportation.

The four areas of concern outlined above – toxic site, design guidelines, combined sewer overflows, and transportation safety – are the reasons we feel this project should not be approved.

We would appreciate any additional information you could provide about this project as it progresses through the planning stages.

Respectfully,

Ann Broderick for The Neighbors of McKinley Park

Email: Ann.broderick@gmail.com

Zachary Dahla

From: Ann Broderick <ann.broderick@gmail.com>
Sent: Wednesday, May 15, 2024 11:00 AM
To: Zachary Dahla
Subject: 324 Alhambra Blvd. project question

Follow Up Flag: Follow up
Flag Status: Flagged

Mr. Dahla,
One of my neighbors told me this Alhambra site had a toxic chemical issue a while back. Can you please tell me who actually cleaned up the toxic site, when did they clean it up and who signed off that it was officially cleaned up. If possible, we would like a copy of these documents.

Also, I noticed the Noise study was done on a Wed. which is probably the least busiest day on the Business 80 corridor. As you are probably aware, there is heavy construction being done over the river in that area, the lanes are very narrow and traffic is at a crawl most of the day. Once that construction is done, cars will be traveling 80 miles an hour. Why was that not considered in the noise study?

Respectfully,
Ann Broderick

Zachary Dahla

From: Ann Broderick <ann.broderick@gmail.com>
Sent: Sunday, June 16, 2024 10:13 PM
To: Zachary Dahla
Cc: Katie Valenzuela (City); Jovy Navarro
Subject: Project P24-007, MaryAnn's Bakery site

Follow Up Flag: Follow up
Flag Status: Completed

Mr. Dahla,

The neighborhood has not heard any information about this large project at 324 Alhambra Blvd. Can you please tell me when the developers plan to have some community input regarding such a project that will greatly affect a residential neighborhood of single story houses. Also, I believe this project is being built in the combined sewer system area. Can you tell me where the developer plans to locate an off-line sewage storage facility for the 300+ apartments which I believe is required by the Water Quality Control Board.

Thank You,
Ann Broderick

Zachary Dahla

From: Ann Broderick <ann.broderick@gmail.com>
Sent: Wednesday, July 17, 2024 12:59 PM
To: Zachary Dahla
Subject: AgencyCounter: P24-007 inquiry

Follow Up Flag: Follow up
Flag Status: Flagged

Mr. Dahla,
There was a recent neighborhood meeting about the MaryAnn's bakery project. Although we all agreed there is a need for more housing in Sacramento, the scale and design of the proposed 6-story apartment complex does not fit into the size and character of the neighborhood. Several questions came up regarding this project.

1) The diagram shows a large outdoor rooftop patio on the fifth floor of the complex that faces the residents on the other side of Alhambra Blvd. How does the developer intend to keep the noise level down and the privacy intact for the single-story homes nearby and the small two-story apartment that is across the street?

2) There appears to be a large 2,400 square foot coffee shop on the corner of Alhambra & D. Will this be open to the public and if so, where will people park their cars? This complex is in a corner of East Sacramento with poor access in and out of the area and no public transportation nearby.

Also, there appears to be a swimming pool, lounge area, fitness center, yoga studio and courtyard inside the complex. We assume these areas will be private for just the apartment residents. How does the developer plan to keep the public out of these areas?

3) It is unclear how the electrical system and the utilities will be handled for this very large structure without affecting the neighbors. For instance - A) There is an annotation on the plans that says transformers which faces C street - what is the purpose, design and noise level of this electrical structure. B) How will the garbage be disposed of? The diagram has 2 trash rooms that face C street and D street on the ground floor which is across the street from residents. How will the developer keep the homeless from going through the trash? C) We see no solar system but only a mention that it might come in the future - doesn't the city have a mandate for new buildings being more energy efficient when they are first built?

We would appreciate any information you could provide regarding our questions.

Regards,
Ann Broderick

CASA LOMA TERRACE – EAST SACRAMENTO

NEIGHBORHOOD ASSOCIATION

P.O. Box 160033, Sacramento, CA. 95816

SUBJECT: P24-007, PROPOSED DEVELOPMENT OF MARY ANN'S BAKERY SITE

Dear Mr. Dahla,

Our membership has reviewed the proposal, and has a number of serious concerns.

As you know, this project falls within the Alhambra Corridor Special Planning District, subject to different design and code criteria than the general City limits. Specifically, the ACSPD provides that:

> Height shall not exceed 35 feet, except by exception on a Conditional Use Permit (variance from requirements)
>
> The intent of the ACSPD is to ensure the preservation of neighborhood scale and character, more specifically:
>
> - Maintain and improve the character, quality, and vitality of individual neighborhoods;
> - Provide the opportunity for a balanced mixture of uses in neighborhoods adjacent to transit facilities and transportation corridors.

In general, this project appears to fail by all measures. More specifically:

Height. The proposed building is nearly twice the allowable height, and completely out of scale with anything in the larger neighborhood area. The neighborhood consists primarily of one- and two-story homes, with some compliant (35 feet or under) newer development. This would be the sole building in the greater area exceeding 35 feet.

Architectural appearance. The proposed building style appears completely out of place in the Casa Loma Terrace/ East Sacramento neighborhood. Development should at least echo architectural elements of the area. The Sutter Park and McKinley Village developments provide good examples of how this can be done.

Density. The greater neighborhood has a density of approximately 24 persons per acre on average. McKinley Village appears to have approximately 19 people per acre, and Sutter Park approximately 16.5 per acre. The proposed development would have between 227 and 300 people per acre. This is completely out of scale and character for the neighborhood.

Transportation. The project is not adjacent to any transit facilities. Using the standardly accepted Institute of Transportation Engineers model, the project as proposed will generate between 1,500 and 2,238 trips per day. The nearest transportation corridor on- and off-ramps (E and H streets) are among the most severely impacted/congested in the City. Such an addition will be further crippling to an already grid-locked corridor.

Traffic. The surrounding neighborhoods already struggle with heavy traffic flow, and are at or beyond the threshold of residential viability. The addition of 1,500 to 2,238 vehicle trips per day, plus retail traffic, will be devastating for the neighborhood, and destroy its vitality.

Parking. The developer proposes to provide far less on-site parking than there will be residents, and makes does not account for parking for retail. This will result in cars circling blocks looking for parking, unnecessarily further reducing already questionable air quality due to the proximity to the freeway.

Lack of outreach. The developer has offered no community outreach to solicit community input. I contrast with other recent major development projects in East Sacramento:

- McKinley Village, where the developer had 30 community meetings and another 51 community meetings with various organizations.
- Sutter Park, where Paul Noble of the East Sacramento Improvement Association "told council members that the developers did a good job of reach out to the people in the neighborhood. They were actually looking for ideas, and they listened to what the people had to say".

Various other concerns have been expressed, including the lack of senior or affordable housing, extreme demand being added to an antiquated sewer/wastewater system, adequacy of water supply and pressure availability in the event of fire in such a tall structure, and others.

Overall, this project will not preserve the neighborhood scale and character – in fact it will egregiously and irreparably damage it. Further, it will irreparably harm the vitality of the long-established neighborhood, dating from the 1920's and 30s. The project is unacceptably far beyond the specified limit of height. And thus our concerns.

Please include Casa Loma Terrace – East Sacramento Neighborhood Association (CLTESNA) on all correspondence and information regarding Project 24-007, the proposed redevelopment of the Mary Ann's Bakery site.

Sincerely,

Carl Seymour

President, CLTESNA
carlsccp@surewest.net

ESP, Inc., PO Box 191763, Sacramento, CA 95819

Mr. Dahla,

East Sacramento Preservation, Inc. (ESP) is a Sacramento Neighborhood Association that is very concerned about the proposed development of the Mary Ann's Bakery Site (P24-007) at Alhambra and C and D Streets.

Our board has reviewed a brief update of the project. It shows that now more units have been added and fewer parking spaces on site. This means more cars will be flowing into already narrow and congested neighborhood streets for their parking needs. I am assuming that each unit will have a minimum of 2 cars. This translates to about 500-600 cars without designated or available onsite parking spaces will overflow into the contiguous neighborhoods.

While on traffic, these same cars will add to the already congested and backed up traffic waiting to get onto the East bound Business-80 freeway at the on-ramp at 30th and E Streets. Presently we are seeing traffic stacked from 30th street backed onto McKinley Blvd to Alhambra Blvd. and wrapping around the intersection onto the north side of Alhambra from McKinley Blvd. What are the traffic engineers saying about this impaction?

The other major concern about this project is the lack of height restriction to 3 stories high in keeping with the Alhambra Corridor Special Regulations and Restrictions Code (cited below). Remember these "infill" projects are to be "in keeping with the existing residential neighborhoods. How is a residential development of 6-stories complementary to single family one-storied small residential homes?

17.420.020 Alhambra Corridor special regulations and restrictions.

B. Residential preservation transition buffer zone.

1. General rule. Except as provided below, development located within 300 feet of a residential zone (measured from the street centerline) shall not exceed 35 feet in height. This restriction is intended to establish a buffer zone to protect residential neighborhoods from visual intrusion by new development that is out of scale with the adjacent residential neighborhood.

2. Exception. The planning and design commission may approve a conditional use permit allowing additional height, provided that the height may not exceed the limits established by the applicable base zoning chapter. To approve the conditional use permit, the planning and design commission must find that the development will not be out of scale with the adjacent residential neighborhood. An example where the intent of the buffer zone is maintained while allowing additional height is a development incorporating design features or step-backs that reduce the walled effect on adjacent smaller-scaled residential development.

ESP wants to be included in all correspondence and information regarding the Mary Ann's Bakery Project (P24-007). Also, ESP, (use wgreen@surewest.net) would like to be informed of any community outreach meeting that may be planned by the developer or City of Sacramento for this project.

How is this P24-007 in Keeping with the Code?

ESP would like a response from you regarding our stated concerns.

Respectfully,

Martin Palomar, President / martinpalomar@yahoo.com

Will Green, M.D. Treasurer / wgreen@surewest.net

Zachary Dahla

From: E M S <whereselke@hotmail.com>
Sent: Thursday, July 11, 2024 12:45 PM
To: Zachary Dahla
Subject: Re: Maryann's Bakery Redevelopment project

Dear Mr. Dahla

Thank you for your response.
I appreciate your efforts and feedback.

Please note that the community will be keeping a close eye on the project and will mobilize against it if it goes forward in its present form.

I trust the City will take the wishes of its local citizens seriously, and not just play into the hands of big developers who stand to profit, but don't have to suffer the long-term consequences.

Short term gains have long term consequences.
Food for thought.

Elke Schlosser

From: Zachary Dahla <zdahla@cityofsacramento.org>
Sent: Tuesday, July 9, 2024 12:25:31 PM
To: E M S <whereselke@hotmail.com>
Subject: RE: Maryann's Bakery Redevelopment project

Hi Elke,

Thank you for providing comments on the Alhambra Redevelopment project (P24-007).

By submitting this public comment, you are actively engaging in the planning process and providing the City with feedback/input on this proposal, and I appreciate you taking the time to do so.

The project is still in the early stages of the planning process, so certain project aspects are still being reviewed/considered and there is no estimated or targeted hearing schedule for the project at this time.

To answer your question about notices, City staff typically only mails out notices for release of CEQA documents for public review and of upcoming public hearings on projects, which is why you did not receive a notice that this project was submitted for planning review. However, I hear your concern about wanting additional or early notification of new projects in your area. To provide additional notification opportunities, the City has created a new development tracker tool called Agency Counter. On Agency

Counter, you can create an account and request to receive notifications/alerts of new planning and/or building projects that have been submitted in an area of the City that interests you, such as East Sacramento. If interested, here is a link to Agency Counter and, to set an area of preference, click on the "red bell" which will take you to new screen where you can draw or select boundaries for notifications: https://sacramento.agencycounter.com/?tab=map

Additionally, I hear you concern about limited community engagement. City staff encourages applicants to engage with the community throughout the planning process to discuss aspects of their proposals and solicit community feedback. However, in lieu of any specific outreach efforts by the applicant team, submitting public comments such as this are important as they document for City staff specific community concerns on projects as well as general opposition and/or support for projects or project aspects. All public comments are forwarded to the applicant team for review/consideration and added to the project's administrative record for inclusion and response to in future staff reports for decision-makers to review and consider before making any formal determinations.

Planning staff also does not typically host community meetings on development proposals and instead encourages applicants/developers to engage with the local neighborhood group to present their proposals at a monthly meeting and solicit community feedback. To assist in initiating some community engagement, I am reaching out to the applicant to request they coordinate with the local neighborhood group (East Sacramento Community Association) to see if they can have their project added to an upcoming agenda to receive some community feedback.

If you have any additional questions, let me know and I am happy to jump on a call to discuss.

Best,

Zach Dahla **(He/Him)**
Associate Planner | Central Area | Planning Division
City of Sacramento Community Development Department

sacramento I 2040
City of Sacramento General Plan Update and Climate Action Plan

Interested in the City's General Plan Update and Climate Action & Adaptation Plan? Visit Sacramento 2040 to learn more!

From: E M S <whereselke@hotmail.com>
Sent: Monday, July 1, 2024 6:58 AM
To: Zachary Dahla <zdahla@cityofsacramento.org>
Subject: Maryann's Bakery Redevelopment project

I have grave concerns about the proposed redevelopment of the Mary Anns Bakery Redevelopment project on Alhambra between C and D Streets.

It is completely out of character for this historic residential neighborhood.

The height and scope is not in keeping with current restrictions, and traffic and parking will be a nightmare for existing residents if the project goes forward in its present form.

Traffic on C Street is already way too high, and this project in its proposed version will effectively ruin the neighborhood.

I propose a scaled down version of 3 stories with at least 1 parking space for every resident as most people have a car.

Also the architectural renderings I have seen completely mis-state the character of the neighborhood.
They show 30th and D streets as 4 lane streets which they are not!
They also show a large number of 2 story homes which don't exist. This is a blatant lie and attempt to misguide.

I am not against a redevelopment. Just not on the proposed scale.

I also want to see the City hold public hearing with neighbors close to the property to inform them and hear their concerns. Why have there been no public meetings or announcements of the project?
It is clear to me that this is an illegal and nefarious attempt to skirt the project through without anyone noticing.

I would like to meet with you to discuss this further. As a resident my property and quiet enjoyment will be severely impacted if this project goes through in its present form.

It is your duty as a city representative to address my concerns.

I look forward to meeting with you.

Elke Schlosser
916.817.9574

Zachary Dahla

From: Joseph Kehrt <jkehrt@yahoo.com>
Sent: Wednesday, July 10, 2024 10:20 PM
To: Zachary Dahla
Subject: Re: Proposed Project at the corner of Alhambra and D Street, Sacramento. 95816

Follow Up Flag: Follow up
Flag Status: Flagged

Hi Zach,
Thank you for your reply to my emailed comments and concerns. Please do add me to mailing lists related to this project. My mailing address is:
Joe Kehrt
3129 D Street
Sacramento, CA. 95816

One additional concern I have which is shared with many of the other residents in this area is that the proposed project is likely to house over 500 occupants but only provide about 60% of the parking spaces that would need to be allocated for over 500 new residents. The apartments are likely to house working class people, which is wonderful; but these people would no doubt need transportation to various jobs likely in the form of automobiles. Adding capacity for this many people without providing sufficient parking for their transportation is not right and is likewise not in keeping with the character of the neighborhood. It would negatively impact parking and living conditions for the existing residents of the C and D Street. Unfortunately Sacramento public transit is not developed sufficiently at this time to relieve the additional transportation needs. In essence it is a plan to fail and the developers should not be allowed to profit by under allocation of parking and then walk away with excessive profits leaving behind a failed plan.

Respectfully submitted, Joe Kehrt, D Street Resident

Sent from Yahoo Mail for iPad

On Wednesday, July 10, 2024, 11:57 AM, Zachary Dahla <zdahla@cityofsacramento.org> wrote:

> Hi Joe,
>
> Thank you for providing comments on the Alhambra Redevelopment project (P24-007).
>
> By submitting this public comment, you are actively engaging in the planning process and providing the City with feedback/input on this proposal, and I appreciate you taking the time to do so.
>
> City staff encourages applicants to engage with the community throughout the planning process to discuss aspects of their proposals and solicit community feedback. However, in lieu of any specific outreach efforts by the applicant team, submitting public comments

such as this are important as they allow the community to document their specific concerns on projects as well as voice their general opposition and/or support for projects or project aspects. All public comments are forwarded to the applicant team for review/consideration and added to the project's administrative record for inclusion and response to in future staff reports for decision-makers to review and consider before making any determinations.

The project is still in the early stages of the planning process, so certain project aspects are still being reviewed/considered and may change.

Additionally, I am happy to add you to the mailing/noticing list to receive for all future hearing and environmental notices on the project but will need your mailing address. Could you please send over the best mailing address to reach you?

Feel free to reach out if you have any additional questions.

Best,

Zach Dahla (He/Him)
Associate Planner | Central Area | Planning Division
City of Sacramento Community Development Department

-----Original Message-----
From: Joseph Kehrt <jkehrt@yahoo.com>
Sent: Sunday, July 7, 2024 5:59 PM
To: Zachary Dahla <zdahla@cityofsacramento.org>
Cc: casalomaestsacna@gmail.com
Subject: Proposed Project at the corner of Alhambra and D Street, Sacramento. 95816

Dear Zach,

I am writing about the proposed six story apartment building to be constructed at the corner of Alhambra Blvd. and D Street in the old Mary Anne's bakery building.

The people in our neighborhood are very much in favor of developing the block of Alhambra Blvd. between C and D Streets. It has been empty for years and is actually an eyesore as well as fostering homeless camps and crime. It would be wonderful to have some housing built there that would work with and add to the character of the neighborhood instead of having an abandoned building that gets more decrepit each year. I live on the next block of D Street so this project impacts me and my neighbors a lot. We are close knit, friendly very eclectic bunch of people. Many of us have lived here several decades. It's a great community, very accepting of people of all walks of life and all identities and we're proud of that. .

The building being proposed however is not at all in keeping with the neighborhood! We are one and two story homes. Having a six story behemoth of a building would be totally out of

line for our area and could potentially ruin living conditions for those of us who have lived here so long as well as the young folks who have joined us in recent years. There have been many other units built near here that are much more in keeping with the neighborhood, for example the homes at I and J on Alhambra. The project being considered is way out of scale.

I only recall one meeting about a year and a half ago by the developer. It was very uncomfortable and extremely poorly conducted but I was there as were a lot of people from the neighborhood. We stood on the corner in the cold and were told about it. It was not a discussion. Since then, nothing. Why? I would like to be added to the list of people to be notified about the project. The people who live here need to be considered and our input requested so that something can be built that will fit the space and agree with the character feel of the area. I reiterate, I am not and we as a neighborhood are not against building housing but it's got to be right. This project is not! If this was being considered in the “Fab 40’s” area the project would not be being carried out in this manner and I don’t think the planning department would allow it to be. It should be the same for this neighborhood and the people who live here.

Respectfully submitted, Joe Kehrt, D Street resident

Zachary Dahla

From: Katrina Beedy <k_beedy@yahoo.com>
Sent: Friday, July 12, 2024 4:31 PM
To: Zachary Dahla
Subject: Proposed Development at Mary Ann's Bakery Site on Alhambra

Follow Up Flag: Follow up
Flag Status: Completed

Hi Zach,

I am a resident on 510 Alhambra Blvd right across from McKinley Park in East Sacramento, and I am concerned about the proposed 6-story apartment development on Alhambra on the former Mary Ann's Bakery site. As planned, I understand the development would house up to 500 people, with parking only available for 344 people. I am very concerned about the impact this would have on street parking in the area, as well as the impact on the overall neighborhood. I think it makes sense to convert the existing building into housing, but the number of proposed units and height of the building as proposed is excessive.

Do you have any updates on this proposal, and could you add me to the notification list serve for this project? Please let me know if there is anything else I can do to submit public comment or otherwise express my concerns about this project.

Thank you!
Katrina

Zachary Dahla
Associate Planner
City of Sacramento Community Development Department

Re: Public Comment Letter on Proposed Alhambra Redevelopment Project (P24-007): Oppose

Dear Mr. Dahla,

I am a City of Sacramento resident living on the corner of Alhambra and McKinley Boulevard, and I am writing to express my opposition regarding the proposed Alhambra Redevelopment project on the former Mary Ann's Bakery site on Alhambra and D Street.

According to city records, this proposal would consist of a six-story mixed-use development with 302 multi-unit dwellings and 344 parking spaces. **While I am fully in support of converting the existing building into housing, I am concerned that the scale of this proposed development would have an unduly negative impact on local residents. If the applicant's proposal moves forward, I implore the developer and City of Sacramento to scale down the height and number of proposed dwelling units, ensure parking for every new resident, and ensure compliance with local zoning laws.**

See below for specific details on my concerns:

1. **Building height:** As noted above, the proposed development is six-stories high (68 feet). The building height allowed by the City's Zoning Code for buildings on this block is 35 feet. *The proposed development is in a quiet residential neighborhood where no other building exceeds the height regulations. A six-story building would tower over all other buildings in the area and fundamentally change the neighborhood, in violation of guidance issued by the Alhambra Corridor Special Planning District (see number 4 below).*

2. **Parking:** The proposed development consists of 302 multi-unit dwellings, including 76 studios, 164 one-bedrooms, 61 two bedrooms, and 1 three bedroom. The probable resulting occupancy from this development would be 450-500 people. Given that there are only 344 planned parking spaces, *this would mean anywhere from 100-150 residents may be parking on the surrounding neighborhood streets on any given day or night. In addition, the planned ground floor retail space may or may not add parking.* Due to the building's proximity to McKinley Park, parking can already be incredibly competitive in the area, especially in the evening, on weekends, and during special events. This would have an outsize negative impact on local residents that sometimes need to park on the street (myself included).

3. **Noise and Traffic:** As noted above, the proposed development may house up to 500 additional residents. This will *invariably increase noise, vehicle and foot traffic, and potentially litter in the area and in the nearby park*.

4. **Neighborhood Scale and Character:** As noted above, the City of Sacramento's Alhambra Corridor Special Planning District (SPD) *requires that new development "preserve the neighborhood scale and character." The proposed high-density, high-rise project covering a whole city block does not meet this criteria*.

I have lived near McKinley Park for five years, and I love my neighborhood. I cherish my daily walks on the quiet, tree-lined streets of East Sacramento. Given our city's housing crisis, I think it absolutely makes sense to open buildings in our beautiful neighborhood to new residents. However, in its current form, this development will add significant noise traffic, severely impact parking, and forever change the character of the neighborhood.

Thank you for your consideration of my comments. Please keep me updated on any new developments on this project.

Sincerely,

Katrina Beedy

Zachary Dahla

From: Rajesh Chauhan <jesh159@yahoo.com>
Sent: Tuesday, April 23, 2024 4:22 PM
To: Zachary Dahla
Subject: AgencyCounter: P24-007 inquiry

Follow Up Flag: Follow up
Flag Status: Completed

Hi Zach

I have the properties right next door 3014 D (4) units and 3018 D (4) which are in the Alhambra Historic district as the Bakery.

when i wanted to redevelop i was given 26 pages of conditions of approval that didn't allow some of the things i have listed

1) set backs and heights 320 ' from residential how is an applications a building 60' tall next to buildings that were only allowed to be 35'.

is the city now allowing applications after denying the rest of the property owners in the area to go that height?

2) dont see Traffic flow with application which impacts community can we get that so can see

3) dont Utilities and Flow test for 302 units

4) Alhambra historic dept how does this building meet historic ?

5) parking for the rest of the residential homes in area there are only 344 spaces for 302 units
where is the guest parking ?
commercial parking?
and will the streets now become permit parking ?
I understand 50% parking has been waived , but its not suppose to be waived for that massive of a number in a residential area . the street can only hold 10 cars each side

6) units per acre how its this project allowed so much? compared to the rest of the neighborhood? units per acre are their so residential streets

7) alley way being removed yet trash locations on street sides further taking away parking how are both of these items possible

8) bike parking which takes away even more residential parking for the current home owners

Which you have to keep in mind this community the majority of properties do not have driveways and have to park on the streets

can you please let me know how these considerations are possible

also any information on project has been removed from property

thanks

Jesh
916 769 3878

Zachary Dahla

From: John Thor Cornelius <thorcornelius@gmail.com>
Sent: Thursday, January 30, 2025 12:08 PM
To: Zachary Dahla
Subject: Concern about project number p24-007.

Follow Up Flag: Follow up
Flag Status: Flagged

As a homeowner in the East Sacramento area (422 Alhambra Blvd), I was just informed about the proposed project p24-007.

I'm very concerned about the project for a number of reasons including the extreme height of the project, The lack of parking spaces, and concerns about traffic. I'm not sure these concerns are being fairly addressed with the current plan.

Please add me to the list of people who want to be notified about anything regarding this project.

Thank you,

John Thor Cornelius, MD

Zachary Dahla

From: Meghan McKenna <mmckenna210@gmail.com>
Sent: Friday, June 28, 2024 12:19 PM
To: Zachary Dahla
Subject: Proposed development for Alhambra Blvd

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Mr. Dahla,

I am writing to express my deep concerns over the proposed development for the warehouse site formerly occupied by Mary Anne's Bakery. My concerns are many, and as I enumerate them below I hope that you take them seriously, and answer them to the best of your abilities. I also want to say that I am not at all opposed to development at this location. In fact, I welcome it. However, this project does not make any sense for the proposed location.

Firstly, this project is simply too large for the location and violates city zoning laws. The location in question is part of the Alhambra Corridor Special Planning District. Buildings in this location are not allowed to be greater than 35 feet in height. This project is expected to be 68 feet tall--nearly double the allowed height. This fact alone should be enough to make anyone question if a building of that size makes sense for this area.

In addition to the height of the building, the number of occupants is enormous compared to the population density of the surrounding streets. The Alhambra Corridor Special Planning District gives a very clear restriction on height. What is less clear is how one would "preserve the neighborhood scale and character" as mandated by the special planning district. However, 500 people living on one square block is clearly far too many people for this residential area of the city. Perhaps a building of this size would make sense for Midtown, but we do not have the city services or infrastructure for so many people, and it would undoubtedly change the character of the neighborhood.

In reviewing the plans for this project, I did not see anything stating what impact the building would have on parking and traffic in the surrounding neighborhood. I live on C and 32nd street and can say that this is already a highly used road. Adding 344 cars (which is what the project has planned for parking spaces) would cause gridlock in morning traffic. The E street freeway onramp is already crowded in the mornings, I can't imagine what it would be like with a massive apartment complex next door. Please have someone do an analysis on how this would impact traffic and noise to the surrounding residents.

Furthermore, in the developer's proposed graphics, the project appears to be located at a block surrounded by four lane double yellow striped thoroughfares. This is completely inaccurate. 30th street is a one way, one lane road, and the other streets surrounding the plot of land are two lane roads. It is laughable to think that a building of this size, and with this many occupants, could be supported by the infrastructure in the community. It also appears that the developers are either intentionally hiding this fact by purposely using an inaccurate graphic, or have never visited the site themselves. Both scenarios are incredibly problematic.

I also have questions regarding the neighborhood's ability to handle sewage and electricity for this project. As someone who would live one block over from this complex, what would happen to my home if a sewer line were to back up? Will my electricity be less reliable with 500 people adding new demands to the grid? Or does this city have a plan to address these concerns? I would like to know how these services will be impacted.

I am also very curious to know the state of the project. Has the land been bought? Is the project approved? What additional reports can we expect? When will the project move forward? etc. The developer has made no efforts to do any of this outreach or make any of this clear to me or my neighbors.

I would like to take a moment to express what I do like about this project, because I am not opposed to the project in general, just to the size and density. I eagerly hope that someone will buy this land and put housing on it.The city and the state need more housing, and any empty land in this city should be turned into housing. At least, in my opinion. I like that they would keep the old brick facade. I think that could very much be seen as keeping with the character of the neighborhood. I think an apartment complex or row of condos would make a lot of sense. We need more housing density than single family homes, this is just too big and too dense for this spot. I am also excited at the idea that some of this land would be used for a cafe, bistro, or corner store. All of these things are wonderful. What I am primarily concerned about is the height exceeding 35 feet, the number of units proposed, parking and traffic impacts, as well as how the project will impact city services such as sewage and electricity. I am also very bothered that there hasn't been any outreach from the developer thus far.

Thank you so much for considering these concerns, and for answering whatever questions you are able to address.

Best wishes,
Meghan McKenna

3167 C Street

Zachary Dahla

From: Kimmai McClain <kimmai.mcclain@gmail.com>
Sent: Friday, January 30, 2026 5:36 AM
To: Zachary Dahla
Subject: Fwd: P24-007 - Alhambra Redevelopment Project/Mary Ann's Bakery - pedestrian/bicycle safety

Apologies--forwarding as it appears there was a typo in Zach's original email. Thank you,

---------- Forwarded message ---------
From: **Kimmai McClain** <kimmai.mcclain@gmail.com>
Date: Tue, Jan 27, 2026 at 8:34 PM
Subject: P24-007 - Alhambra Redevelopment Project/Mary Ann's Bakery - pedestrian/bicycle safety
To: <zdalhla@cityofsacramento.org>
Cc: <district4@cityofsacramento.org>, <mayor@cityofsacramento.org>, <district3@cityofsacramento.org>, <eguerra@cityofsacramento.org>

Hi Zach,

My name is Kimmai and I live along Alhambra Blvd (between McKinley Blvd & D Street) and have recently learned of this new project one block from my home. I think additional housing is important, as are safe streets and infrastructure.

I largely commute via bicycle and know that this area is a thoroughfare for cyclists to connect with the American River Bike Trail. I routinely experience unsafe driving secondary to congestion and traffic; I was nearly killed by a truck last month running a red light.

I'm deeply concerned that the current plan will make an already dangerous intersection/area even more dangerous and I've not seen adequate plans to address this. Would you be able to elaborate on this?

Kind regards,

--
Kimmai V. McClain
408-518-2788

Zachary Dahla

From: Ann Rothschild <rothschild.ann@gmail.com>
Sent: Friday, January 30, 2026 5:02 PM
To: Zachary Dahla
Subject: Fwd: P24-007 Alhambra Redevelopment at former Maryann's Bakery.

Our information had a spelling mistake! I hope this works. My apologies for the error, and the message is the same!

---------- Forwarded message ---------
From: **Ann Rothschild** <rothschild.ann@gmail.com>
Date: Thu, Jan 29, 2026 at 4:06 PM
Subject: P24-007 Alhambra Redevelopment at former Maryann's Bakery.
To: <zdalhla@cityofsacramento.org>

Dear Mr. Dalhla,
We support infill buildings within the city--so much better than spreading out over the fields. I support multi-use housing.
However, I object to the latest iteration of the building on the former Maryann's Bakery for the following reasons:
It's just too big in every way.
It violates the Alhambra Corridor Special Planning District objectives.
It is twice the size of the original plan and so doubles population and traffic concerns.
There are limited outlets to get to midtown or the freeway and the intersection on McKinley and Alhambra will be jammed.
Parking concerns: less than half the units provide parking, so street parking will be needed, already at capacity.
Only market value housing--the city needs mixed-cost housing, and some subsidized housing.
Huge sewage increase with no accommodation made in the plan.

Keep the original plan--do not double it!
Thank you.
Michael Rothschild
Ann Rothschild
4216 C St, Sacramento, CA 95819.

Norman Spalding, DDS and Flora Young Spalding, EdD

1571 12th Avenue

Sacramento, CA 95818

(916) 595-2019

normandflor@gmail.com

July 1, 2024

Zach Dahla, City Planner

Re: Mary Anne's Bakery Site

Dear Mr. Dahla,

We are the owners of the house located at 315 Alhambra Boulevard, directly across from the 6-story building proposed to replace the Mary Anne's Bakery. We have serious objections to this project in its current configuration and the potential changes to the neighborhood it may bring. Of concern to us is the height of the building, the increased traffic, noise and impact to parking it will bring to our quiet neighborhood. There is only one two story building in the vicinity, the apartment house across the street at Alhambra Boulevard and D Street. This proposed building is completely out of scale and will clash significantly with the peaceful visual esthetic of this part of East Sacramento. Regarding the traffic, adding this many people in this area will add significantly to the congestion and noise in our peaceful neighborhood. There will certainly be many residents who choose not to use the parking structure and with the proposed retail spaces on the ground floor, the street parking may be significantly impacted. For these reasons, we oppose this project in its current configuration.

Please add our names to the list of those to be notified about the project. Thank you.

Sincerely,

Norman Spalding, DDS

Flora Young Spalding, EdD

Casa Loma Terrace – East Sacramento Neighborhood Association
June 5, 2025

No Impact?

POPULATION DENSITY

- East Sacramento: 11.2 people per acre
- San Francisco: 29.1 per acre
- New York City: 45.8 per acre (Manhattan 67)
- Alhambra "Redevelopment" Project:
  - 384.9 people per acre at City's figure (870 residents)
  - 221.24 people per acre at 500 residents

Project at City's estimate is:

- 34 times denser than East Sacramento
- 8.5 times denser than NY City

If East Sacramento was populated at project's rate, pop would be 810,701 instead of 23,528.

PERCENTAGE INCREASE

Adds 3.7% to East Sacramento population in just one block

Compare to:

- Adding Sacramento's population to the State's: 1.35%
- Adding San Francisco to the State: 2.2%
- Adding San Jose to the State: 2.39%

VEHICLE TRIPS PER WEEK

Car-centric, because not near light rail or viable bus line.
Greenhouse gas/carbon footprint intense.

Adds 19,043 vehicle trips per week, as:

2,637 daily vehicle trips Monday – Friday

3,300 vehicle trips on Saturdays

2,558 vehicle trips on Sundays

WHERE WILL THIS TRAFFIC GO?

Freeway on- and off-ramps at E and H – arguably the most congested in the City, very high pollution burden

Intersections of E and H with 29th and 30th. 29th and H is the second most dangerous in the entire City.

C Street, D Street, Alhambra Blvd, McKinley Blvd/E, H – already unsafe for children, pedestrians, and bicyclists, and frequently backed up

Per Deakin-Harvey, City's traffic consultant, streets cease to be residentially viable at 9,000 cars per day

OTHER IMPACTS

Sewage and stormwater: direct feed into antiquated combined sewer system, not mitigated, pay impact fee

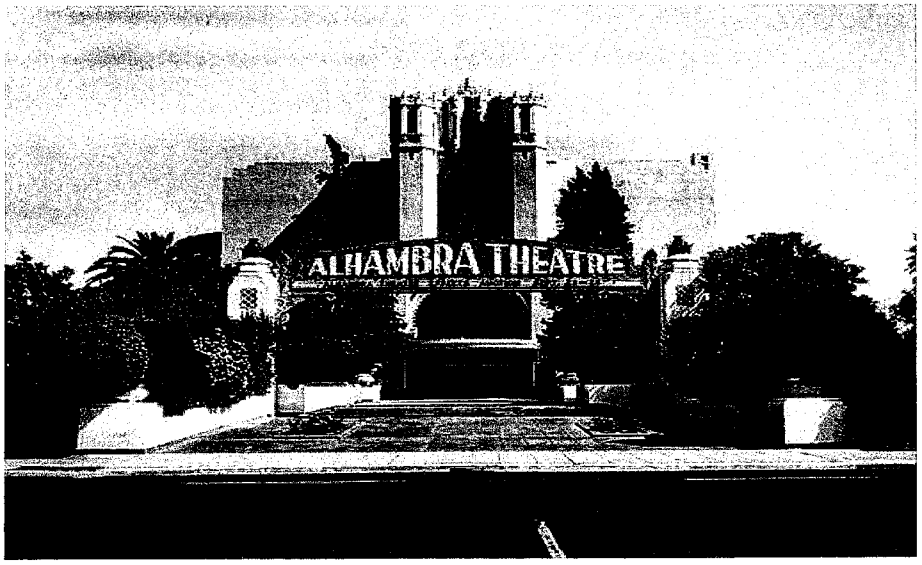
Parks: City would require 7.9 acres of parkland, but is waived with impact fee

Parking:

- insufficient for number of residents, neighborhood already crowded
- residential permit fees likely coming but not this year

HISTORICAL AREA

- IS/MND looked only at Mary Ann's Bakery/Pureta Sausage factory buildings, not surrounding neighborhood as required
- Casa Loma Terrace eligible for listing in Sacramento, California, and National historical Registers based on type of homes, age of homes, and association with lives of persons important in our past
- Predominantly characterized by one- and two- story Bungalow and Craftsman, some Victorians, some apts and small businesses



Built 1927, Demolished 1973

ALHAMBRA CORRIDOR SPECIAL PLANNING DISTRICT (ACSPD) REQUIREMENTS

- Limits height to 35 feet (3 stories) – which all others have complied with
- Requires "step back" in height
- "Design should be similar in

  scale... to adjacent single family residential structures"

  architectural character to adjacent single family residential structures.
- "Prevalent styles include: Craftsman, California Bungalow, Mediterranean, Mission, Spanish, Period Revival, Colonial

ACSPD, continued

- Maintain the diverse character and housing opportunities provided in these neighborhoods
- Ensure the preservation of neighborhood scale and character
- Maintain and improve the character, quality, and vitality of individual neighborhoods

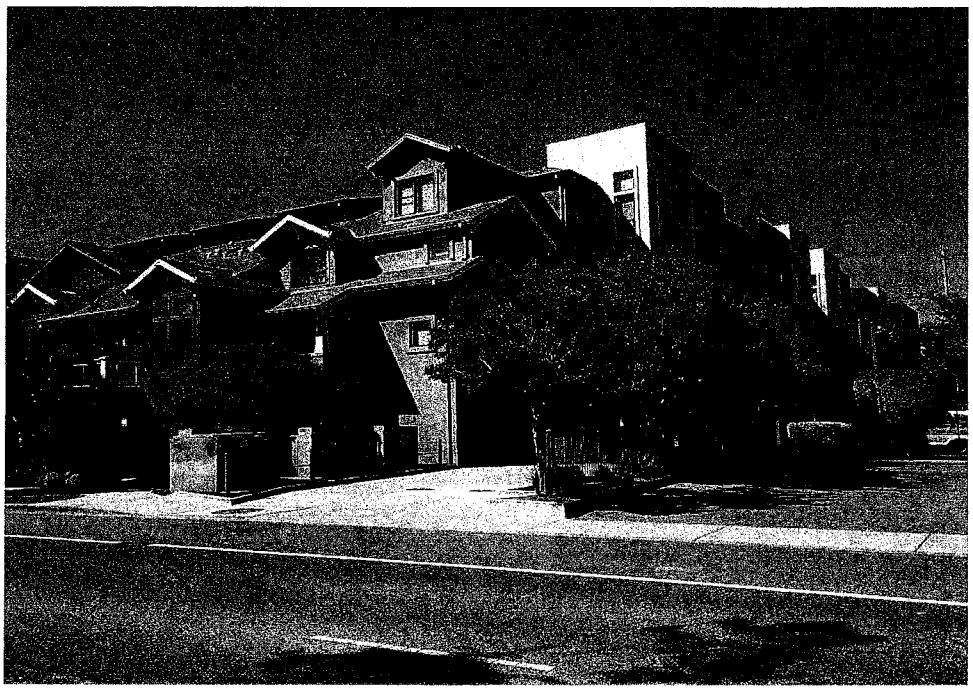
WHAT DO WE HAVE TO COMPARE ALHMABRA "REDEVELEOPMENT" PROJECT TO?

3 EXISTING NEWER 6 STORY IN EAST SAC:

Two are on light rail, one across the street from Sac State – NOT car centric

No height limitation in zoning for location

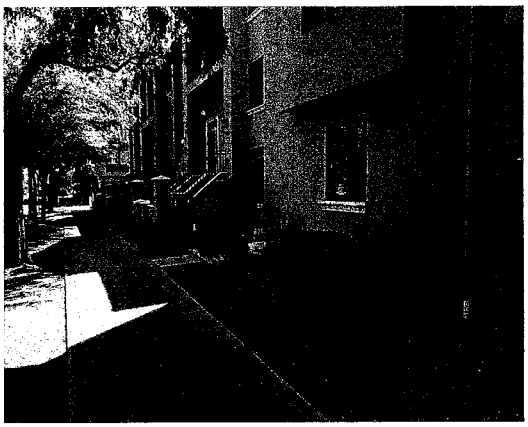
Commercially developed neighborhoods adjacent to substantial office, retail and related

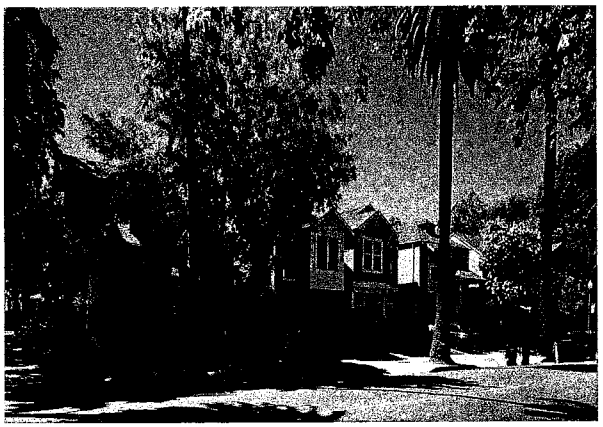


2211 F; and Washington Square

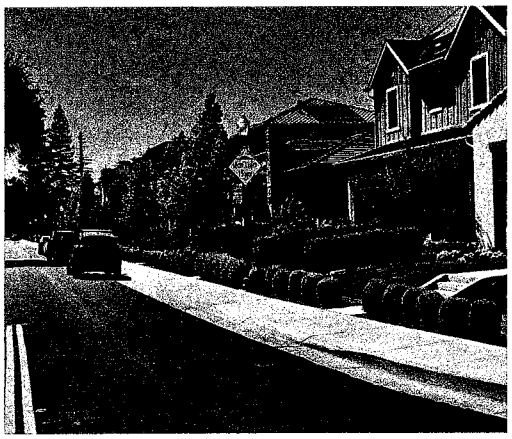
2211 F Street, former Rite Aid site, Project DR24-052

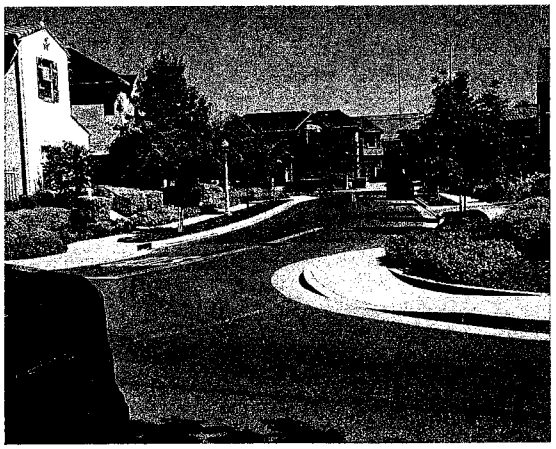
900 Alhambra; and Metro Square





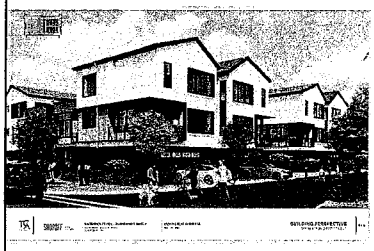
Sutter Park; and McKinley Village





NEED FOR HOUSING

- Yes, more housing is needed, we support that.
- 56% of new 1 and 2 BR apartments are still unrented 3 months after opening, five quarter trend (Newsweek, May 31, 2025)
- Vacancy rates (Q4 '24 and Q1 '25) highest since 2021
- Theory – more apartment supply will bring down rents – is not working. Instead, builders stop building.
- U.S. Housing market currently has 500,000 more sellers than buyers
- EXAMPLES OF PROJECTS PROPOSED OR UNDERWAY FOLLOW:

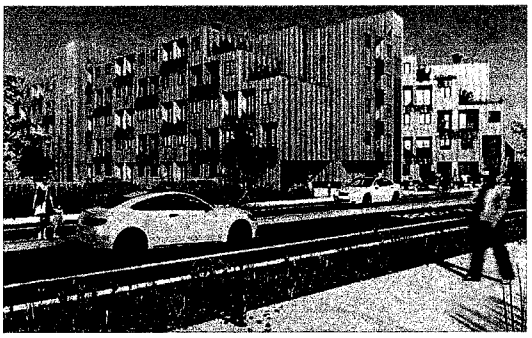


2100 Q, formerly Sacramento Bee, **reduced from 6 stories**

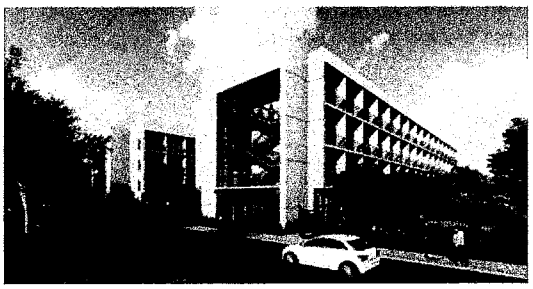
3625 Fong Ranch Rd, South Natomas, Sacramento. 119 affordable apartments and around 100 single-family townhomes

2130 J Street, adding 100 units

2000 16th Street, 134 units

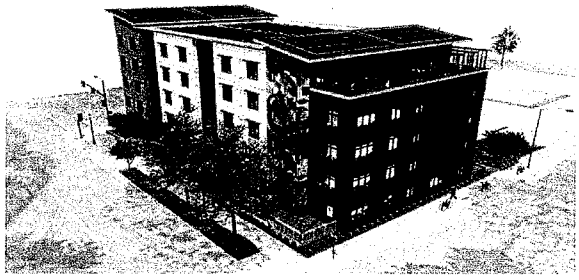


2910 Ramona Avenue, 200 units, 5 stories



7141 Woodbine Avenue. Over 200 affordable apartments

1900 Capitol Ave, midtown, 252 units, 8 stories

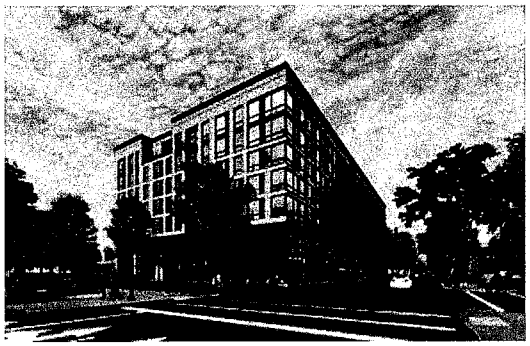


815 11th Street

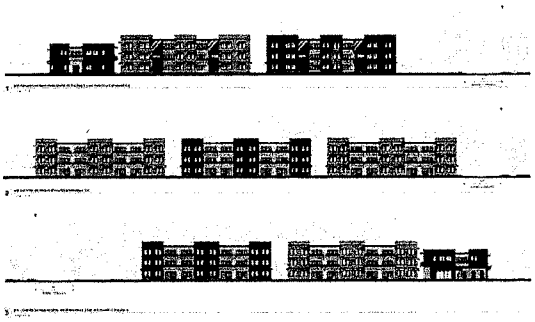
1300 C Street, 3 stories

620 15th Street, 3 stories

2399 American River Drive, Campus Commons,
3 stories, condominiums



1617 J Street, mixed residential and commercial, 7
stories

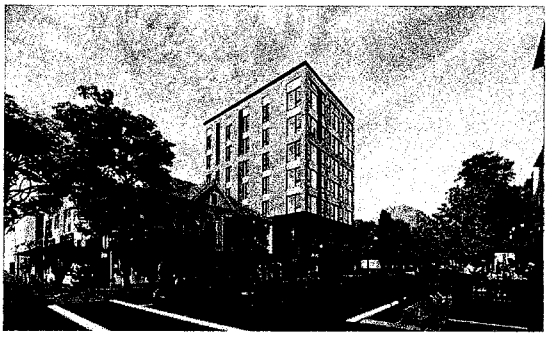


8740 Bruceville Rd, 125 apartments,
5 buildings, 3 stories

1801 21st Street, "Sac Bee South", 3 stories

2020 U Street, 2 buildings, 40 units

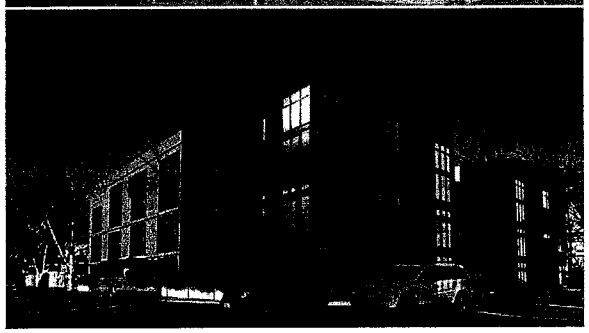
Delta Shores, 167 one-bedrooms, 145 two-bedrooms, and 32 three-bedrooms. Coupled with another 232 units at 8105 Delta Shores, total 576 units across both applications. Density of 27 units per acre.



116 18th Street, mixed use

805 R Street, 200 units, 5 stories

631 F Street, 150-units, senior housing



424 12th Street, 3 stories, 132 units

VOICE YOUR OPPOSITION!

The red shaded area shows the proposed construction above the 35-foot height limit in the Alhambra Corridor and the "Residential Preservation Transition Buffer Zone." Renamed Alhambra Redevelopment Project P24(007), it is located at the site of the historic Pureta Sausage Company and Mary Ann's Bakery in East Sacramento.

TELL THE CITY TO ENFORCE THE 35-FOOT MAXIMUM HEIGHT LIMIT.

The Alhambra Corridor Special Planning District (Alhambra SPD) places a 35-foot height restriction on development located within 300 feet of a residential zone from the centerline of the street. "This restriction is intended to establish a buffer zone to protect residential neighborhoods from visual intrusion by new development that is out of scale with the adjacent residential neighborhood." (Section 17.420.020, Sacramento City Code)

The Alhambra Redevelopment Project ("Project") would gut the protections provided by the 35-foot height limit and will generate massive negative impacts throughout East Sacramento, including architectural incompatibility, increased hazardous traffic conditions, and more raw, untreated sewage that will overwhelm (and overflow) East Sacramento's already beleaguered Combined Sewer System (CSS).

Traffic is already a nightmare, and this project would make it worse.

Morning traffic backed up on McKinley Blvd. at Alhambra Blvd.

With 332 units, this Project is projected to generate more than half a million additional vehicle trips annually through already congested, hazardous conditions. The congestion is made worse by the concentration of hospitals south of the Project, including Sutter Medical Center, Anderson Lucchetti Women's and Children's Center, Mercy General Hospital, Alex G. Spanos Heart & Vascular Center, and U.C. Davis Medical Center. These facilities all generate substantial emergency vehicle traffic. These emergency vehicles have difficulty navigating the congestion either to reach the hospitals, or to reach their patients to take them to the hospitals for emergency medical care.

Data from "Streets for People: Sacramento Active Transportation Plan (2025)" documents that:

- East Sacramento and the Alhambra Corridor already experience the highest levels of traffic congestion and pedestrian transportation stress—collision points—in Sacramento.
- H Street consistently experiences the highest traffic levels, surpassing those in downtown, midtown, and other areas of East Sacramento.
- H Street and 29th Street are the second most hazardous locations for collision points involving cars, cyclists, and pedestrians.
- Folsom Boulevard at 40th Street is the tenth most dangerous collision point.
- J Street and Folsom Boulevard are designated arterials. However, they do not connect directly to downtown. Instead, H Street and McKinley Boulevard have become major arterial routes to downtown.
- Traffic congestion on H Street is severe, with backups sometimes stretching six and eight blocks.
- The transition of McKinley Boulevard into E Street generates constant traffic from vehicles entering and exiting the Business 80 Freeway.
- Motorists frequently run red lights, further endangering pedestrians and cyclists.
- Midtown has the advantages of traffic-calming measures. However, their measures have effectively diverted the bulk of the traffic onto East Sacramento streets, making daily life increasingly difficult for East Sacramento residents.

There are 322 parking spaces for 332 apartments. Parking is already insufficient in East Sacramento. Residents often have their driveways blocked by illegally parked cars.

Concerned residents in East Sacramento want to work collaboratively with the City to install traffic-calming measures, such as speed bumps, already installed in other residential neighborhoods, to slow speeding traffic and enable safe access to residents' driveways.

In December 2024, Raftelis performed an audit of the DOU water and wastewater fund. Findings from the Raftelis audit include:

- The current risks of catastrophic wastewater system assets failure appear to be high
- The deferred capital investment is increasing the risk of assets failing catastrophically, increasing the consequences of failure,
- The need for higher levels of asset Renewal and Replacement funding in the next 5 to 10 years to catch up on the deferments.
- By not renewing and replacing the existing assets, they become harder to keep operational and properly maintained. As a result, the capacity of the infrastructure decreases and becomes significantly less reliable and resilient, and the value of the assets decreases.
- About 74% of the wastewater assets have 20 years or less of remaining useful life.
- About 53% have 10 years or less of remaining useful life.
- About 30% of the wastewater assets appear to have no useful life remaining and should be assessed for immediate replacement.

Raw sewage remaining on streets and yards the day after flooding overwhelmed the McKinley Park Sewage Vault—October 25, 2021.

- Catastrophic failure of the wastewater system could include a major trunk sewer line breaking or one of the treatment facilities or pump stations failing, spilling hundreds of thousands or millions of gallons of sewage into the streets and waterways within the City.
- These types of failures are very expensive and can take considerable time to fix, resulting in a significant risk to public health.

The sewage crisis in Sacramento has existed for decades. The sewage vaults have not solved the problem. Allowing developers merely to pay fees to allow sewage to flood the pipes beyond capacity of the existing Combined Sewer System is a disaster.

Developers must provide storage for sewage generated on their property. Approval of this monstrous Project ensures catastrophic failure of the wastewater system. The City cannot approve the Project without accepting responsibility for catastrophic failure of the Combined Sewer System in East Sacramento.

The health and safety of the residents must become the City's highest priority.

Zachary Dahla

From: Doug Timpe <douglasjtimpe@gmail.com>
Sent: Monday, February 3, 2025 9:45 AM
To: Zachary Dahla
Subject: Concerns about Project No. P24-007

Follow Up Flag: Follow up
Flag Status: Flagged

Hello,
I live in the East Sacramento neighborhood close to where the proposed Project No. P24-007 is located, and I have some concerns. The main concern is the proposed height of the new building, which will dwarf the other neighborhood structures and change the landscape of the community.

Can you please keep me informed about any information or progress on this project?

Thank you,
Doug

--

DOUG TIMPE

REALTOR©

LIC# 02206532

WINDERMERE SIGNATURE PROPERTIES

916-282-8252

dtimpe@windermereca.com

dtimpe.windermereca.com

2580 Fair Oaks Blvd, Suite 20 / Sacramento, CA 95825

Zachary Dahla

From: Kate Samsa <kate.samsa@gmail.com>
Sent: Wednesday, January 29, 2025 3:02 PM
To: Zachary Dahla
Subject: Project No. P24-007

Follow Up Flag: Follow up
Flag Status: Flagged

As a resident and home owner living near the project at 324 Alhambra, I am very concerned about the overbuilding of our area and what it does to our quality of life. We are a neighborhood of nurtured homes, landscapes and trees.
Our area already suffers from heavy traffic congestion along H St and Alhambra and McKinley with the freeway on ramp. McKinley Park is a heavily and daily used park - and we welcome that usage, but weekends we can barely pull in and out of our driveway due to maxed out street parking.
The prospective residential building in project P24-007 has a height that far exceeds any residence anywhere near it and the 35 feet allowed by city zoning code.
The number of apartments strains the already burdened sewer system. There is a lack of public transportation in the area that necessitates car travel - and there isn't street availability for more and constant street parking.

Hold this project to the current height allowed by city zoning code.

Kate Samsa and Mike Feroah
443 33rd St.
Sacramento

Zachary Dahla

From: Neal Pfeiffer <nppfeiffer@sbcglobal.net>
Sent: Tuesday, June 25, 2024 9:10 PM
To: Zachary Dahla
Subject: AgencyCounter: P24-007 inquiry

Follow Up Flag: Follow up
Flag Status: Completed

Mr. Dahla

I own a home and live at 3224 D Street. Can you please let me know what is the current status of this development request and where it sits in the review process? It appears to me that the proposed 6 story building is a very large structure that would introduce a lot of traffic into the neighborhood on multiple single lane streets, and I have concerns about whether it would be an appropriate use of the property on which it is being built.

Thanks, and I look forward to hearing from you.

Neal Pfeiffer
3224 D Street
Sacramento, CA 95816

Zachary Dahla

From: Patricia Turse <pturse@gmail.com>
Sent: Monday, July 15, 2024 7:49 PM
To: Zachary Dahla
Subject: MaryAnne's Bakery site developer proposal

Follow Up Flag: Follow up
Flag Status: Completed

Dear Mr.Dahla,
I am a resident of D Street, just off Alhambra, and I am writing to express my deep concern over the proposed 6-story, 302-apartment structure the developer has graced us with. He's even tossed in a four-lane version of 30th Street, and various "upscaled" versions of C and D Streets.

Has this developer even been to Sacramento? He seems to have just plugged in a graphic showing a huge structure he envisions that is out of scale and character with the actual neighborhood.This is such a high density project that-IF it is built as currently proposed, traffic, parking, and the character of this neighborhood will be forever impacted. I urge you not to let that happen.

Please keep me informed about this project.

Patricia A Turse
3109 D St.
Sacramento, CA 95816-3334

Zachary Dahla

From: Rian Troth <rynsac@sbcglobal.net>
Sent: Thursday, January 30, 2025 10:15 AM
To: Zachary Dahla
Subject: Project No. P24-007

Follow Up Flag: Follow up
Flag Status: Flagged

Hello-

As a nearby resident of the proposed redevelopment at 324 Alhambra Blvd, Project No. P24-007 I have several concerns about the development.

1) overall building height should be limited to four floors not six as proposed to blend into existing neighborhood.
2) every unit should have at least 1 parking space assigned. Have additional spots built for larger unit needs.
3) scale down project size and number of units. Surrounding neighborhood streets cannot handle the additional traffic that will be generated.

Thank you,
Rian Troth
3111 I Street
Sacramento, CA 95816
916-813-8547

Zachary Dahla

From: Theodore Marentis <marentis@gmail.com>
Sent: Thursday, June 5, 2025 8:59 PM
To: Zachary Dahla
Cc: Paige Greaves Marentis
Subject: Feedback re: Alhambra Project/ Maryann's bakery

Follow Up Flag: Follow up
Flag Status: Completed

Dear Zach,

Thanks for being part of the city team for the project and help present and answer questions!

Just echoing everyone's concern at the meeting that 820 residents with 320 parking spots in a landlocked by highway and levy part of town just won't work. As proposed this is a meatpacker project that will greatly detract from the neighborhood.

The lot would be much better developed as condos like 19L, brownstones or townhouses like McKinley Village. The developer can still get top dollar if they optimize differently.

Please do not grant the height exemption and send them back to the drawing board.

Best,

Theo & Paige Marentis
3301 McKinley Blvd

Zachary Dahla

From: Ani Baghdassarian <ab@4pbw.com>
Sent: Thursday, February 12, 2026 3:03 PM
To: District 4; Mayor; Zachary Dahla; rkutect@gmail.com
Subject: Opposition to Project Number P24-007

Follow Up Flag: Follow up
Flag Status: Flagged

Good Afternoon,

I am a property owner & resident of East Sacramento.

As currently proposed, I am against the Alhambra Redevelopment Project (P24-007). I am asking you to please oppose this project because it significantly violates the city's 35-foot height limitation. This project will harm & destroy the character of East Sacramento and open the door to future large multi-story buildings. This project will increase the stress & strain on our neighborhood's traffic, sewer system, noise and public safety.

I have no objection to a residential/rental/apartment building at this location as long as it stays within the current 35-foot height limit. For example, The Angeleno apartment building on J Street & 48th Street, is a great example of a rental building that fits nicely in our neighborhood. Please do not approve the Alhambra Redevelopment Project beyond the 35-foot height limit. Thank you for considering my opposition.

Ani Baghdassarian.

Zachary Dahla

From: Antonia Chapralis <paraskaki@sbcglobal.net>
Sent: Wednesday, March 11, 2026 9:49 PM
To: Mayor; rkutect@gmail.com; Zachary Dahla; District 4
Subject: Redevelopment Project P24-007

Hello, all.
I'm writing to tell you that we strongly oppose the massive 6-story Alhambra Blvd. apartment house because of the traffic situation!

That whole area (H St., Alhambra, McKinley Blvd., E St., and 30th St.) becomes congested each day starting around 4:00. I often find H Street backed up from the lights on Alhambra all the way to 34th St. Going north on Alhambra you'll find cars racing towards E Street to get on the freeway. On two occassions I even saw cars passing others in front of McKinley Park. The onslaught of cars on Alhambra and McKinley can be backed up almost to the tennis courts. Those cars coming off of Elvas Ave. race around to get into the queue
for the freeway. Add to that the many who run red lights along with a lack of traffic code enforcement, and it is already hazardous! This proposed development with all those added autos will make that area even a worse safety zone!

Look, we understand the need for infill but we don't understand destroying the quality of life of our neighborhoods that are already in need of dire attention, e.g. traffic enforcement, majorly pot-holed streets and an aging wastewater system.

Such a dense complex does NOT belong in an established, historic neighborhood. It seems that the City is concerned only about financial gain. By not following long-standing neighborhood height standards and by adding to the already dangerous traffic congestion, the City will be doing a disservice to the homeowners and taxpayers who call East Sac home.

Residents deserve a well-planned, scaled back structure which will benefit the residents and enhance the community. Please re-consider. This is the City's chance to do it right!

Sincerely,
Tim and Antonia Chapralis

Zachary Dahla

From: Izzy Furl <izzyfurl@gmail.com>
Sent: Sunday, February 15, 2026 6:53 PM
To: Zachary Dahla; Mayor; District 4
Subject: Opposing the 6-Story Alhambra Corridor Redevelopment Project, P24-007

Follow Up Flag: Follow up
Flag Status: Flagged

Please—as one of your constituents, enforce the 35-foot height limit, prevent ever further traffic hazards, preserve historic properties, and stop overloading the failing sewer system.

I travel on skates nearing everyday to work, and it is a blessing. I am very fortunate that as of now I can plan my journey weaving around traffic. However, I am certain that my route to work would become increasingly unsafe if this development proceeds as is.

Zachary Dahla

From: Joanna B <joannabo32@gmail.com>
Sent: Thursday, February 12, 2026 4:32 PM
To: Zachary Dahla
Subject: Fwd: I oppose the proposed redevelopment project, P24-007

Follow Up Flag: Follow up
Flag Status: Completed

---------- Forwarded message ---------
From: **Joanna B** <joannabo32@gmail.com>
Date: Thu, Feb 12, 2026 at 4:30 PM
Subject: I oppose the proposed redevelopment project, P24-007
To: <district4@cityofsacramento.org>

Councilmember Pluckebaum
I am pro smart development in all areas of Sacramento.
This plan does not fit the site or the available infrastructure of the neighborhood.
I live in district 4 and I live one block away from the proposed building site for this monstrous building. Our streets, sewers, and neighborhood cannot support this size of development. I am not opposed to the building of more affordable housing in my neighborhood or in East Sacramento in general.
I want development in proportionate size and scope of the surrounding area. And it must come with improved infrastructure and services. We have limited street space for parking. The intersections for freeway access and neighborhood access at E Street, H Street and J Street are already too narrow, congested and unsafe. There's already too much cut-through traffic from Elvas speeding through and congesting the streets and intersections. This development would create more safety risks for pedestrian and bicycle traffic.
Joanna Boettcher
3201 C Street
Sacramento, 95816

Zachary Dahla

From: Jill Rivera <jrrtrek@gmail.com>
Sent: Thursday, February 12, 2026 4:23 PM
To: Zachary Dahla
Subject: Project number P24-007

Hello,
Approved. I oppose this project for many reasons.
Jill Rivera

Zachary Dahla

From: Leslie Hagins <lesolita@gmail.com>
Sent: Thursday, February 12, 2026 3:18 PM
To: Mayor; District 4; rkutect@gmail.com; Zachary Dahla
Subject: Alhambra Corridor Redevelopment Project. PLEASE oppose!

Follow Up Flag: Follow up
Flag Status: Flagged

Hello,

I am writing as a very concerned East Sacramento resident today. As an apartment dweller, paying $1700 on rent alone, in a 42-unit complex that has had at least THREE vacant units open here for weeks and weeks, I want my voting voice to be heard stating I am in total opposition of the proposed 6-Story Alhambra Corridor Redevelopment Project, P24-007. We do NOT need a gigantic, overpriced housing monstrosity in this area. What will happen is MULTIPLE people will move into each unit here to manage the overpriced rent, not just the amount they are intended for!!! THAT is what happens! So, you might think you're voting on 332 "units" which is already totally inappropriate for this neighborhood and the streets - but in truth you might actually be adding 664 people (if not more!!!), and 664 CARS (if not more!!!). It is unbelievable this is even being considered for this already highly congested area. The highway already regularly gets backed up into the intersections over here! This type of ridiculously MASSIVE project should NOT be anywhere near an area that is already having traffic concerns on a daily basis. Have you ever tried to do the morning commute on Highway 80 from the area this is being proposed?!?! It is dead-stop traffic!

The mass influx of residents is a serious concern, but beyond that, East Sacramento has a very well known OVERLOADED sewer system!!!! Approving this ridiculously tall LOOMING 6-story monstrosity among the regular sized surrounding, quaint homes would be irresponsible at best. Why so huge?!?! This seems like a greed motivated project that has very little care or RESPECT for the older, low-key neighborhood it will be invading and totally changing. Have we all not seen what GREED has done to our nation in the wrong hands?!? The love of money will also destroy this neighborhood, its sewer system, and any charm it has. This isn't a NIMBY attitude. It's a hope of proper planning attitude. This is NOT the place for a 6-story monster of a building! Please respect and enforce the 35-foot height limit in the Alhambra boulevard and the Residential Transition Buffer Zone.

We regularly witness traffic accidents, and risk our lives daily just trying to walk IN THE INTERSECTIONS over here, so we are begging for traffic *calming* efforts, not a massive influx of hundreds upon hundreds of more cars and people in this small area that is not designed for such a thing.

Thank you for your consideration,
Leslie Hagins
H Street Resident

Zachary Dahla

From: mark o'connor <canoer58@gmail.com>
Sent: Sunday, March 1, 2026 3:34 PM
To: Mayor
Cc: Zachary Dahla
Subject: P24-007

Hello,

I am a longtime resident of East Sacramento. Living here has felt like living in a small town within a big city, but that is rapidly changing. Our once quiet, bike-friendly, child safe neighborhood is evolving into a high-traffic, congested frenzy like the rest of the City and its neighboring communities.

I am vehemently opposed to the construction of a high-rise building in the Alhambra Corridor. We need to protect our quality of life, not risk traffic safety by exponentially increasing vehicle use in family neighborhoods.

Please enforce the 35 foot height limit and prevent traffic hazards and collisions.
Residents deserve a responsible, scaled back structure which benefits the community.

Regards,
Mark O'Connor
Sent from my iPad

Zachary Dahla

From: Ron Maertz <ronmaertz@surewest.net>
Sent: Thursday, February 12, 2026 3:25 PM
To: Zachary Dahla; rkutect@gmail.com; District 4; Mayor
Subject: zdahla@cityofsacramento.org>, <rkutect@gmail.com>, <district4@cityofsacramento.org>, <mayor@cityofsacramento.org>

Follow Up Flag: Follow up
Flag Status: Flagged

I have lived in East Sacramento for 30 years and know the neighborhood well. I know traffic patterns, highly used streets for traffic, places to safely walk, congested streets etc. I live near this proposed site at Mary Ann's Bakery.

I am a Planner by profession, and this is not good planning. It is an attempt to get the City out of a budget deficit in years to come..

This is not transit-oriented development since there is basically no transit in the vicinity. This is just basically over-building the site and the h__ with the neighbors and the residents of East Sac.

Please deny this use permit request and send the developer back to the drawing board for a project that can meet height restrictions and is respectful of the neighbors and the entirety of East Sac.

Ron Maertz

Zachary Dahla

From: Susan Heaton <Susan.Heaton@doj.ca.gov>
Sent: Thursday, February 12, 2026 3:04 PM
To: Zachary Dahla; rkutect@gmail.com; District 4; Mayor
Subject: Potential Development at Mary Ann's Bakery (30/Alhambra and C/D)

Follow Up Flag: Follow up
Flag Status: Flagged

Good afternoon,

I was just looking at the development proposal for the old Mary Ann's Bakery location. I have lived in East Sacramento for almost 30 years now. It is a wonderful pocket area. I live near 52nd and Folsom. There has been a significant amount of development over the years, most recently near 65th Street and UC Davis Medical Center which has GREATLY affected my ability to drive around my neighborhood. Sometimes I can barely merge onto Folsom Blvd. due to the amount of traffic. J Street is not much better. If building continues in this pocket area it will be undesirable to live here.

PLEASE DO NOT ALLOW A 6 STORY BUILDING in our pocket area. It is not appropriate here.

Thank you,

Susan and Ron Heaton
1463 52nd Street
Sacramento, CA 95819
Kittycaretaker1@gmail.com
916-893-1852

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Zachary Dahla

From: Theresa Bracco <t.bracco@gmail.com>
Sent: Thursday, February 12, 2026 5:45 PM
To: Mayor; rkutect@gmail.com; District 4; Zachary Dahla
Subject: Oppose the MASSIVE 6-story Alhambra Corridor Redevelopment Project, P24-007

Dear Sirs,

As a long time resident and homeowner in East Sacramento, I strongly urge you to oppose this horrible project.

I implore you to responsibly represent your constituents well-being and demand that they enforce the 35 ft height limit, prevent traffic hazards, preserve historic properties, and stop overloading the failing sewer system. Residents deserve a responsible, scaled back structure which benefits the community.

Theresa Bracco
(916) 261-9993

"A pessimist is one who makes difficulties of his opportunities; an optimist is one who makes opportunities of his difficulties." - Reginald B Mansell

Zachary Dahla

From: terri franklin <terrifranklin4@gmail.com>
Sent: Thursday, February 12, 2026 4:14 PM
To: Zachary Dahla; rkutect@gmail.com; District 4; Mayor
Subject: In opposition of Alhambra Corridor Redevelopment Project

Please let this email serve as my voice in opposition of the Alhambra Corridor Redevelopment Project, P24-007.

Thank you
Terri Franklin
East Sac resident

Zachary Dahla

From: WRL <whitney.r.leeman@gmail.com>
Sent: Sunday, February 15, 2026 7:21 PM
To: Zachary Dahla
Subject: Fwd: we oppose Mary Ann's Bakery project

Follow Up Flag: Follow up
Flag Status: Flagged

---------- Forwarded message ---------
From: **WRL** <whitney.r.leeman@gmail.com>
Date: Sun, Feb 15, 2026, 6:18 PM
Subject: we oppose Mary Ann's Bakery project
To: <district4@cityofsacramento.org>, <mayor@cityofsacramento.org>, <zdahla@cityofsacramento.oeg>, rkutect@gmail.com <rkutect@gmail.com>

We oppose this development as proposed, but would support a three-story building rathet than a six-story building.

Developers and would-be tenants do not have the right to cause harm to residents of east sac and City taxpayers in general.

We have paid, and will continue to pay enormous property taxes, in part, to keep water and sewer infrastructure functional in east sac. The benefits of the McKinley holding tank will be lost if we let developers densify without regard to the externalities created by their project.

In addition to water and sewer demands, this proposal will also strain traffic, pedestrian/bicycle safety, and air quality.

Sincerely,

Whitney Leeman & Mark Gauger
1040 45th St, Sacramento, CA 95819

Zachary Dahla

From: mike reget <muttsdoc@yahoo.com>
Sent: Sunday, February 15, 2026 6:30 PM
To: Zachary Dahla
Subject: Alhambra Redevelopment P24-007

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Zach Dahla

I would like to voice my strong apposition to the proposed structure at Alhambra and C/D Streets. Our family has lived in East Sac for 30 years now and we have seen many changes in this neighborhood including the loss of our 2 hardware stores. We have 3 large apartment complexes near 65th and Folsom, the McKinley Village development and the Sutter Park development. Traffic in our neighborhood has increased significantly in recent years without any city planning for this increase in traffic. Additionally, when the McKinley Village project was approved a walking path/tunnel was planned at the end of Alhambra Boulevard at the train tracks to help decrease traffic along C St. This tunnel has of course never been constructed so this must happen prior to this development. I will highlight reasons this project needs to be shut down PRIOR to any further approval.

1. This project will further tax our sewer infrastructure which is in desperate need of updating.
2. This project is far to large and tall for the location. This project will product heavy shade on the houses on the east side of Alhambra and also the buildings on the north side of C St.
3. The height is twice the current allowed limit by the Alhambra Corridor Special Planning District limits for buidlings.
4. Traffic along the C St/Elvas Corridor has increase significantly in the past several years and this project with cause a massive amount of increased traffic at McKinley and Alhambra. At 30th St and McKinley and 30th and D St intersections people struggle with these roads and these intersections need to be completely renovated prior to putting increase traffic along these roads.
5. This building will not allow planting of trees along the streets which is a hallmark of our neighborhood. In fact in this area most of the trees are Sycamores which need a large space for their canopies. We are of course the "City of Trees" and we must increase planting of large trees rather than medium sized as is being done increasingly in our neighborhood.
6. My commute takes me past this block daily and increased traffic is just not acceptable here.

This building should never be allowed to be constructed in it's current redering. This location cannot handle 320 units without major city infrastructure upgrades to the water/sewer system and roads. If you were to stand under the Bus 80 E St bridge at 5pm you will smell the sewer system emitting a putrid odor due to our overtaxed sewer system. When McKinley Village was planned our stressed sewer system was brought up and never addressed. It is time for you, our city leaders, to do something before we have a disaster!

Concerned City Resident,

Mike Reget

Zachary Dahla

From: kerry.kelly443@gmail.com
Sent: Thursday, February 12, 2026 11:37 AM
To: Zachary Dahla
Subject: Redevelopment Project, P24-007

Follow Up Flag: Follow up
Flag Status: Flagged

I oppose this project planned for East Sacramento. We need to follow the District rule which limits buildings to a height of 35 feet.
We need to preserve beautiful East Sacramento and not overload our sewer system and create more traffic at the intersection of Alhambra & McKinley!!
Overall, this would be a disaster for our community!! I have lived in McKinley Park neighborhood for 40 years and believe we need to preserve this beautiful area of the city!!

Sent from my iPhone

Zachary Dahla

From: Enoch Yeung <pdc.eyeung@gmail.com>
Sent: Wednesday, February 11, 2026 6:36 PM
To: Stacia Cosgrove
Subject: Fwd: P24-007 Alhambra (Re)Development Project
Attachments: 331 Alhambra Blvd.HEIC; Aesthetic Design 2.HEIC; Businesses on Alhambra.HEIC; C Street.HEIC; D Street Neighbors.HEIC

Sent from my iPhone

Begin forwarded message:

> **From:** Mary Coronado <merryhln@aol.com>
> **Date:** February 10, 2026 at 3:29:51 PM PST
> **To:** pdc.eyeung@gmail.com
> **Subject: P24-007 Alhambra (Re)Development Project**
>
> Hello Chair Yeung,
>
> As a Sacramento County resident since 1993, I have seen the City of Sacramento grow! In the old days we only had Centro's and the Spaghetti Factory. Originally from Tulelake, California and the Los Angeles area, we are proud to call Sacramento our home. We love Sacramento and are not against growth. Our only concern is the size of this proposed building complex formerly called Mary Ann's Bakery.
>
> I have included pictures so you can get a sense of what the neighborhood feel is like directly across from this building. We ask that you please keep this building within the 35 foot height limit and not to approve the Conditional Use Permit on P24-007.
>
> Continue being the advocate that you are for our Sacramento neighborhoods.
>
> "Growth is inevitable and desirable, but destruction of community character is not." -Edward T. MacMahon
>
> Thank you.
>
> Mary Coronado and Alex Calvario
> 3137 C Street
> Sacramento, CA 95816

Zachary Dahla

From: Stacia Cosgrove
Sent: Thursday, February 12, 2026 2:07 PM
To: Zachary Dahla; Karlo Felix
Subject: FW: Project P24-007

fyi

Stacia Cosgrove
Principal Planner
300 Richards Blvd. Sacramento, 95811
Phone: 916-808-7110
Email: scosgrove@cityofsacramento.org
CDD Website

From: Enoch Yeung <pdc.eyeung@gmail.com>
Sent: Wednesday, February 11, 2026 6:37 PM
To: Stacia Cosgrove <scosgrove@cityofsacramento.org>
Subject: Fwd: Project P24-007

Sent from my iPhone

Begin forwarded message:

> **From:** "matt pacificlibations.com" <matt@pacificlibations.com>
> **Date:** February 11, 2026 at 8:24:12 AM PST
> **To:** pdc.eyeung@gmail.com
> **Subject: Project P24-007**
>
> Commissioner,
>
> I am strongly against the approval of Development Project P24-007.
> As commissioner of the Planning and Design Commission, I think you should be against it as well.
> My primary concern is the height. I am all for development of this neighborhood eyesore, I just want it to be developed within the existing restrictions of the Alhambra Corridor of 35 feet.
>
> The family that owns the land and owned Mary Ann's has said they need the height variance because of clean up cost from a gas tank on the property. The neighborhood should not have to suffer a greatly outsized and un characteristic eyesore that will

adversely effect the quality of life in the neighborhood because the family that owns it and benefited from the property does not want to pay to clean up the environmental problem they created.

Stick with in the 35 feet and all for it!

Regards,
Matt Salie
3240 D St.

Zachary Dahla

From: Anna Seymour <annaseymour007@yahoo.com>
Sent: Thursday, February 12, 2026 7:57 AM
To: Zachary Dahla
Subject: No on P24-007

Follow Up Flag: Follow up
Flag Status: Flagged

I oppose P24-007
Please honor the 35 foot Alhambra corridor code, this is a historic neighborhood and its not set up to handle that many people in one square block. Allowing this project to go through sets everyone up to fail, this area already has major congestion.
Thank you,
Anna Seymour

Yahoo Mail: Search, Organize, Conquer

Zachary Dahla

From: Enoch Yeung <pdc.eyeung@gmail.com>
Sent: Wednesday, February 11, 2026 6:35 PM
To: Stacia Cosgrove
Subject: Fwd: P24-007 'Alhambra Redevelopment'

Sent from my iPhone

Begin forwarded message:

From: cbdesign@surewest.net
Date: February 10, 2026 at 11:42:56 AM PST
To: cbdesign@surewest.net
Subject: P24-007 'Alhambra Redevelopment'

To those making decisions:

I am a resident of McKinley Park.

1. The proposed project referenced above is requires an amendment to the city's general plan and specifically the Alhambra special planning district.

Please don't give a special/conditional use permit for this project. Some kind of housing can be built to fit within these parameters.

2. This proposed project is *vastly out of scale* to surrounding homes which are single story and approx. 1000 sq. ft. or less in size.

It is also *vastly out of character* to surrounding turn of the century, vintage bungalows in Casa Loma Terrace.
Please be sensitive to the surrounding neighbor's homes.

3. While we need housing, many more options could satisfy that need with a two-story structure or building of individual town homes much like the ones found two blocks away on Alhambra Blvd. Please build something that has integrity and adds to rather than detracts to our neighborhood.

4. See pictures attached: Adding hundreds of toilets to this area's frail sewer system will impact everyone around this area.

Adding the "vault" under McKinley Park – while it helped – it did not solve the flooding issue upon heavy or sustained rains. The antiquated, combined sewer system found in this area impacts surrounding property and homes when it overflows with raw sewage onto our streets, yards and park. While flooding occurred shortly after the vault was completed, flooding occurred. When asking a maintenance worker - who was nearby adding caution blocks to the flooded street - to "*open the new vault"* when the rain water rose, he exclaimed "*the vault is already open"*.
This is and continues to be a problem in our area of McKinley Park as the city does not have the resources to split the sewer system.
Please don't add to that impact.

Zachary Dahla

From: Claudia Kirkpatrick <kirkmusic@hotmail.com>
Sent: Thursday, February 12, 2026 10:21 AM
To: Zachary Dahla; District 4; rkutect@gmail.com; Mayor
Subject: Opposition to Alhambra Corridor Redevelopment Project, P24-007

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Friends,

I am writing in opposition to the Alhambra Corridor Redevelopment Project, P24-007.

The Alhambra Corridor Special Planning District limits building height to a height of 35 feet within 300 feet of homes. This is to protect our historic neighborhood. This planned project is much taller than that.

I support a responsible, scaled down version of the project, which works for the community.

Thank you,

Claudia Kirkpatrick

Zachary Dahla

From: Cierra Ramirez <cilramir@gmail.com>
Sent: Thursday, February 12, 2026 10:17 AM
To: Zachary Dahla; District 4; rkutect@gmail.com; Mayor
Subject: OPPOSE P24-007 Alhambra corridor redevelopment project

Follow Up Flag: Follow up
Flag Status: Flagged

Dear officials,

Please oppose this project and think creatively and constructively and sustainably abiut what this city and area actually needs.

The Alhambra corridor redevelopment project is too high and too big, based on the Alhambra corridor special planning district limits.

This project increases public safety risks by encouraging hundreds of thousands more cars in the area. These streets lack safety as ot is. Adding more safety risks makes no sense and is not worth the money you and the developers are making with whatever sweetheart deal you have. How much are people's lives worth to you? I would like you to please respond with a dollar amount.

Lastly, this project will result in an increase over 100,000 gallons of sewage, everyday. Our city's sewer system is already overloaded, impacted, and full of sewage, much like this project.

Fix the problems facing our city, do not add more.

Thanks!

Zachary Dahla

From: dgalbrai@surewest.net
Sent: Thursday, February 12, 2026 9:48 AM
To: rkutect@gmail.com
Cc: District 4; Zachary Dahla; Mayor
Subject: We STRONGLY oppose the Alhambra Corridor Redevelopment Project P24-007

Follow Up Flag: Follow up
Flag Status: Flagged

We live on 40th Street near Folsom Blvd and email all 4 of you -- Chase, McCarty, Pluckebaum, Dahla-- to register our NO vote on a proposed plan to build the Alhambra Corridor Redevelopment project P24-007. We understand there will be a meeting tonight (2/12/26) at City Hall. We hope to attend tonight's meeting.

Thank you.

Zachary Dahla

From: J <chandler.c.justin@gmail.com>
Sent: Thursday, February 12, 2026 11:54 AM
To: Zachary Dahla
Subject: Opposition - P24-007 Alhambra Redevelopment Project

Follow Up Flag: Follow up
Flag Status: Flagged

Greetings Zach,

I am writing to express my opposition to the Alhambra Redevelopment Project (otherwise known as P24-007). Please note my opposition to the project. I am unable to attend the Sacramento Planning and Design Commission meeting this evening, February 12, 2026.

Could you please confirm with me when this opposition notice was recognized on the project's record?

Thank you for your help in this matter,

Local Midtown citizen

Zachary Dahla

From: Janie Payne <janie.payne@sbcglobal.net>
Sent: Thursday, February 12, 2026 2:34 PM
To: Zachary Dahla
Subject: Alhambra Corridor Redevelopment Project

Zach Dahla,

Please do not support this project from moving forward. I have lived in East Sac for 45 years. I drive McKinley Blvd and cross the Alhambra intersection frequently to access Business 80. It is a pleasant stretch of road down a peaceful tree lined street. This complex will add cars, people and alter the texture of our beloved neighborhood.

Janie Payne
601 48th Street

Zachary Dahla

From: Nancy Cornelius <nanjean23@gmail.com>
Sent: Thursday, February 12, 2026 12:14 PM
To: Zachary Dahla; rkutect@gmail.com; District 4; Mayor
Subject: Redevelopment Project P24-007

Follow Up Flag: Follow up
Flag Status: Flagged

Zach Dahla, Robert Chase, Phil Pluckebaum, Mayor McCarty:

I have lived in East Sacramento since 1975 and I know this neighborhood like the back of my hand. I have lived in five locations within East Sacramento so I know traffic patterns, highly used streets for traffic, places to safely walk, congested streets etc. I live near this proposed site at Mary Ann's Bakery. I am a business owner in East Sac and have been since the 1980's.
This massive building is way too high for the site and will affect homeowners who deserve better.
The sewer system is already over taxed and we all know this and have known it for years.
I believe this property should be developed but with a reasonable project with reasonable height limits. Please do not approve this project. We do not have the transit infrastructure to support transit demands.

Nancy Cornelius
Sacramento, CA

Zachary Dahla

From: Rob Sawyer <sawyer.rob@icloud.com>
Sent: Thursday, February 12, 2026 11:46 AM
To: Zachary Dahla; District 4; rkutect@gmail.com; Mayor
Cc: info@saveeastsac.org
Subject: Redevelopment Project P24-007, tonight's Planning & Design Commission Hearing

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Mayor McCarthy, Councilmember Pluckenbaum, Commission Chair Chase and Planner Dahla,

I will be unable to attend tonight's Commission hearing concerning the above-referenced project, i.e., the proposed apartments at the former "Mary Ann's Bakery" block. In lieu of public oral comments, please consider the following.

This project should not be approved in its present form, and the developer should be asked to submit a different proposal for a project that will make more sense for the neighborhood, the city, and current and future residents. Reasons include:

1. There are good practical and policy reasons for the current limitations of the Alhambra Corridor Special Planning District, from which a variance of the type requested is not appropriate, necessary, or a good idea.

2. The density and mass of the proposal are completely inappropriate for the location.

3. The density will create massive traffic and safety problems. E.g. the intersection of 30th and E/McKinley, with its northbound Business 80 on-ramp, and configuration with narrow one-way 30th Street to the north of E/McKinley, is already a mess, especially when regulation of the onramp causes gridlock to not only that intersection, but also intersections on 30th south of E Street. And unless the City is planning to demolish homes in order to 4-lane area streets such as C and D Streets, the various streets surrounding the proposed project will never be able to safely accommodate the level of additional traffic the proposed development will bring.

For perspective, for the past 11 years we have owned our home at Metro Square (bounded by H, I, 26th and 27th Streets). A similar full-block development at the proposed site would be far more appropriate (and in keeping with current zoning). I.e., up to 50 close-setback SFRs with individual garage parking. A more appropriate development of this site should still be profitable for the developer. (Or, in the alternative, something more akin to what has been approved for the Marshall School site.) A massive 6-story apartment complex is far more appropriate for the City Center area.

Thank you,

Rob Sawyer
2623 I Street, Sacramento.

brownrudnick

STEPHEN R. COOK
949.752.7100
scook@brownrudnick.com

February 12, 2026

City of Sacramento
Planning and Design Commission
300 Richards Boulevard, 3rd Floor
Sacramento, CA 95811

RE: Alhambra Redevelopment Project (P24-007)

Dear Members of the Planning and Design Commission:

We submit this letter on behalf of Citizens for Positive Growth & Preservation ("CPGP"), an unincorporated association whose members reside in or around the City of Sacramento. CPGP was created to advocate for positive growth in the City, and the preservation of safe, healthy, and livable residential neighborhoods—including older and historic park-centered neighborhoods—throughout the City.

CPGP objects to the Alhambra Redevelopment Project (the "Project"). As explained below, the Project is not exempt from CEQA under Public Resources Code section 21080.66, which applies only to projects that are "consistent with the applicable general plan and zoning ordinance." Pub. Res. Code § 21080.66(a)(4). Because the Project is *inconsistent* with applicable zoning laws and the City of Sacramento's General Plan, Section 21080.66 does not apply. In addition, the Planning & Design Commission (the "Commission") cannot lawfully issue a conditional use permit for the Project pursuant to section 17.420.020 of the Sacramento City Code because: (i) the Project exceeds applicable base zoning height limits; and (ii) the Project is plainly out of scale with adjacent residential development. Therefore, the Project cannot be lawfully approved as proposed.

Section 17.420.020 of the Sacramento City Code, which governs development in the Alhambra Corridor Special Planning District ("Alhambra SPD") in which the Project is located, provides, in relevant part, as follows:

> General rule. Except as provided below, development located within 300 feet of a residential zone (measured from the street centerline) shall not exceed 35 feet in height. This restriction is intended to establish a buffer zone to protect residential neighborhoods from visual intrusion by new development that is out of scale with the adjacent residential neighborhood.
>
> Exception. The planning and design commission may approve a conditional use permit allowing additional height, provided that the height may not exceed the limits established by the applicable base zoning chapter. To approve the conditional use permit, the planning

> and design commission must find that the development will not be out of scale with the adjacent residential neighborhood. An example where the intent of the buffer zone is maintained while allowing additional height is a development incorporating design features or step-backs that reduce the walled effect on adjacent smaller-scaled residential development.

The Project is inconsistent with applicable zoning ordinances because it does not comply with the height restrictions governing development in the Alhambra SPD. Indeed, the Project—which is 68.17 feet tall—is nearly double the Alhambra SPD's 35-foot height limit. Nor does the Project qualify for a conditional use permit. As a preliminary matter, any such permit may not authorize height exceeding "the limits established by the applicable base zoning chapter." Sacramento City Code section 17.420.020. The maximum height allowed in the C-2 zone for buildings located next to R-1 and R-2 zones is 45 feet at a distance of 39 feet or less; 55 feet at a distance of 40-79 feet; and 65 feet at a distance of more than 80 feet. Even if the Project was located more than 80 feet from the nearest R-1 zone, at 68.17 feet tall, it exceeds the maximum base zoning height limit of 65 feet. Contrary to the staff report, the parapet may not be excluded from the building's total height when assessing its compliance with zoning laws. Because the parapet is part of the planned building, it must be considered when measuring the building's height. Therefore, the Project, as designed, exceeds even the base zone height limit and is inconsistent with applicable zoning laws.

In addition, even if the Project did not exceed base zone height limits, the Project's height exceeding 60 feet cannot be authorized by a conditional use permit because the Project is plainly out of scale with adjacent residential development. The planned step-backs cannot cure this scale incompatibility when introducing a six-story, 68-foot building that occupies nearly an entire city block into a residential area. The staff report fails to present substantial evidence that a project of this height and mass would not be out of scale with adjacent residential development even with the planned step-backs. Therefore, the Commission cannot lawfully make the finding required to issue a conditional use permit to allow the Project to exceed the Alhambra SPD's 35-foot height limit.

The Project is also not exempt from CEQA under Section 21080.66 because it is inconsistent with the City of Sacramento's General Plan in multiple respects. For example, the Project is inconsistent with Land Use Policy 6.4, which provides that "[t]he City shall recognize the patterns in existing neighborhoods by developing defined transitions between these neighborhoods and adjoining areas, and by requiring that new development, both private and public, consider the existing physical characteristics of buildings, streetscapes, open spaces, and urban form of the neighborhood in its design. Designs may be traditional or contemporary but should contribute to the livability of the neighborhood." The Project, which is nearly twice as tall as the 35-foot height limit governing construction in the Alhambra SPD, does not properly consider the existing physical characteristics of buildings in that residential preservation transition buffer zone.

In addition, the Project is inconsistent with General Plan Public Facilities Element 3.6, which provides, *inter alia*, that the City shall ensure that development in the Combined Sewer System ("CSS") area does not result in increased flooding or CSS outflows. Because the Project's impacts on the CSS—which is already over capacity—have not yet been adequately assessed, and the ability to mitigate those impacts has not been determined, it would be impossible for the Commission to conclude that the Project is consistent with the General Plan.

The Project is also inconsistent with the General Plan's Housing Element. As the staff report admits, the Project is located on two sites listed in the 2021-2029 RHNA Housing Element Sites Inventory, which anticipate 33 total units of lower income housing. Because the Project does not include any lower income housing units, it is inconsistent with the Housing Element.

The Project is also inconsistent with the General Plan for the reasons set forth in the May 22, 2025 letter from Nicole Sauviat Criste, which is attached hereto and incorporated by reference. For example, the Project is inconsistent with General Plan Land Use Policies 3.11, 4.1, and 4.6. In addition, it is impossible to determine, based on the information presented, whether the Project is compatible with General Plan Mobility elements 3.1, 3.2, 3.3, 4.1, 4.2, 4.3, and 4.4, or Public Facilities and Safety element 3.3. Therefore, the Project is not exempt from CEQA under Public Resources Code section 21080.66.

The Project is also ineligible for the exemption created by Public Resources Code section 21080.66 because of the presence of hazardous materials at the site. Public Resources Code section 21080.66 provides that "[t]he local government shall, as a condition of approval for the development, require the development proponent to complete a phase I environmental assessment, as defined in Section 78090 of the Health and Safety Code." Pub. Res. Code 21080.66(c)(1)(A). CPGP understands that a phase 1 environmental assessment was prepared by Geocon Consultants, Inc., which identified recognized environmental conditions. Where, as here, recognized environmental conditions are found, Section 21080.66 provides that "the development proponent shall complete a preliminary endangerment assessment, as defined in Section 78095 of the Health and Safety Code, prepared by an environmental assessor to determine the existence of any release of a hazardous substance on the site and to determine the potential for exposure of future occupants to significant health hazards from any nearby property or activity." Although the City has purportedly "conditioned the project to require the preparation of a Preliminary Endangerment Assessment as a condition of approval for the development," it does not appear that such an assessment has been prepared. The Project cannot be exempted from CEQA before an environmental assessor determines "the existence of any release of a hazardous substance on the site" and "the potential for exposure of future occupants to significant health hazards[,]" and a determination is made that such hazards can be mitigated to a level at which it would be safe for people to occupy the building.

Because the Project is not eligible for the exemption created by Section 21080.66, the Project must be subjected to full CEQA review. For the reasons set forth in the attached letter from Nicole Sauviat Criste, the Initial Study/Mitigated Negative Declaration released in or about April 2025 suffers from numerous fatal defects. Those defects include an insufficient project description and inadequate analyses of the Project's impacts on aesthetics, air quality, cultural resources, greenhouse gases, hydrology and water quality, land use and planning, transportation, and utilities and service systems.

As a result of these defects, the City of Sacramento's conclusion that "there is no substantial evidence that the project…will have a significant effect on the environment" is unsupported. In fact, as detailed in the attached letter, there is substantial evidence that the Project may have multiple significant effects on the environment. As one example, the Project would cause significant aesthetic impacts by exceeding the default height limitations governing construction in the Alhambra Corridor Special Planning District, which is intended to serve as a "buffer zone to protect residential neighborhoods from visual intrusion by new development that is out of scale with the adjacent residential neighborhood." As a second example, there is substantial evidence that the Project would cause significant impacts to cultural resources, including the Casa Loma

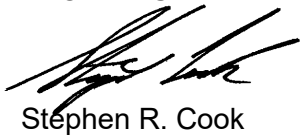
Terrace neighborhood, which qualifies for listing in the Sacramento Register of Historic & Cultural Resources, the California Register of Historical Resources, and the National Register of Historic Places.

CEQA provides that an EIR must be prepared for any project that "may have a significant effect on the environment." Public Resources Code § 21151(a). "[I]f a lead agency is presented with a fair argument that a project may have a significant effect on the environment, the lead agency shall prepare an EIR even though it may also be presented with other substantial evidence that the project will not have a significant effect." CEQA Guidelines § 15064(f)(1). Accordingly, at minimum, an EIR for the Project must be prepared and circulated for public review and comment.

Finally, to the extent that the Commission intends to rely on CEQA Guidelines section 15183—which is cited in the Notice of Public Hearing for the Project but not discussed in the staff report—that section has no application to this Project. As discussed above and in the attached letter, there are project-specific significant effects that are peculiar to this Project and that have not been analyzed in any prior EIR or general plan with which the Project is consistent. Those effects must be studied and disclosed to the public through an adequate EIR.

Very truly yours,

BROWN RUDNICK LLP



Stephen R. Cook

TERRA NOVA PLANNING & RESEARCH, INC.

May 22, 2025

Mr. Ron Bess
Associate Planner
City of Sacramento
Community Development Department
300 Richards Boulevard, 3rd Floor
Sacramento, CA 95811

RE: Initial Study Comments: Alhambra Redevelopment Project (P24-007)

Dear Mr. Bess:

We have been retained by Citizens for Positive Growth & Preservation (Citizens), an unincorporated association dedicated to the preservation of safe, healthy, and livable residential neighborhoods in the City to undertake a comprehensive review of the Initial Study (IS) prepared for the Alhambra Redevelopment Project (Project or Proposed Project). Citizens is concerned that the Proposed Project will substantially impact the existing surrounding neighborhood and East Sacramento. As part of our effort, we have reviewed the Initial Study and its Appendices, as well as plans and documents provided by the City on its website. The results of our comprehensive review and analysis of the Project document are provided below.

1. The Project Description is Incomplete and Inaccurate

It is critical to the CEQA process that any environmental document accurately and completely describe the project it analyzes, so that the public and decision-makers can understand the scope and intensity of development proposed. In this case, the Initial Study fails to provide sufficient information to allow a comprehensive understanding of the Project.

a) The description of the portions of the existing historic building, and what portions of it will be preserved, is overbroad and unquantified. Page 2 of the IS (and again at page 10) states that Project components "include retention of the overall building form and all four facades of 320 Alhambra Boulevard, as well as the contributing north, east, and south facades of 324 through 350 Alhambra Boulevard." First, to state that a six-story building is retaining the building form of a one-story building is ludicrous. Second, the Project Description fails to state that less than 25% of the facades of the building at 324 through 350 Alhambra Boulevard are being retained, and that the building at 320 Alhambra is the smallest, and least imposing structure on the site. Further, it is impossible, either in the IS or the Project plan set, to measure and ascertain the exact dimensions and percentage of loss, since no dimensions are provided in either document, and the applicant's architect has failed to provide a graphic scale, preventing anyone from being able to accurately measure the plans (May 13 Plan Set, Sheets 3 and 3.1). Given the historic significance of the building, an accurate representation of its planned destruction is critical to the analysis in the IS.
b) The building height is misrepresented and incorrect. The IS repeatedly states that the building has a "maximum height" of 62.75 feet. That figure understates the actual building height of 68'2", which includes the parapet. Further, the project description fails to disclose that the maximum height for "portions of buildings," regardless of whether they are above or below the roof, allowed in the C-2 zone for buildings located next to R-1 and R-2 zones is 45

feet at a distance of 39 feet or less; 55 feet at a distance of 40-79 feet; and 65 feet at a distance of more than 80 feet[1]. Again, because of the lack of dimensions on project plans, we estimate that Alhambra Boulevard is a 60 foot right of way. The nearest R-1 zone, therefore, is less than 79 feet from the proposed building, and the maximum building height of 55 feet should be disclosed. Finally, the description under "Conditional Use Permit" on page 21 is false: the maximum height adjacent to R-1 zones in the C-2 zone is measured from any "portion of a building," and must be characterized as 68'2" in order to accurately describe that the Project exceeds the height requirement of 65 feet. Therefore, the project description misleads the reader, and prevents an understanding of the actual provisions of the Municipal Code relating to building heights. Also see the discussion of the Alhambra Special Planning District (SPD) below.

c) Without providing substantial evidence, the project description asserts the Project's inclusion of replacement windows and doors, and the use of bricks would "maintain the historical character" of the existing buildings. Other than the writer's opinion, there is no support for such a conclusionary statement, and it does not belong in a project description.
d) The project description makes repeated directional errors. For example, "pedestrian gates west of the main outdoor courtyard" are actually east (page 13); the "southeastern section of the residential building" should be southwestern (page 14); and the small bike storage room is not east, but rather north of the interior courtyard.
e) The project description omits components of the Project. For example, private patios are described on the south side of the building, but the private patios on the north side and northwest corner are omitted; a single access point for the lounge on the east side of the building is described, but the access from the lobby and interior residences is omitted; as is the second access point for the fitness room. Access to the street is also only partially described. These are only some of the omissions which lead to an incomplete description of how the building will function and interact with the community.
f) The project description states that the Project meets the C-2-SPD requirement for open space by providing 40,852 square feet of open space, but there is no open space requirement in Municipal Code Section 17.216. What assumption was made to determine that the Project complies with open space standards in the zone?
g) Finally, and as further described under the discussion of the Air Quality section below, there is absolutely no discussion of the construction of the building, including in particular the removal of over 10,000 cubic yards of soil to create the subterranean garage and foundations that will support a 6-story, 68 foot tall building; the duration of construction; the equipment to be used and the staging areas and encroachments into neighboring streets that will be required to erect the building.

For all these reasons, the project description is inadequate, incomplete and insufficient, and must be rewritten to truly describe the Project in sufficient detail to allow an comprehensive understanding of the project.

2. <u>The Initial Study's Analysis of Impacts is Inadequate, Incorrect and Incomplete</u>

The following analysis is described based on the Initial Study impact analysis categories. First and foremost, we must note that the IS assumes that the approval of a Conditional Use Permit (CUP) for this Project's height exceedance is the mitigation for multiple impacts. That is an incorrect assumption. In this case, the CUP is an environmental impact, and its level of impact must be analyzed in the Initial Study.

[1] Section 17.216.720.B., Sacramento Municipal Code.

Aesthetics

The IS states that the Project is consistent with the General Plan because it is consistent with the RMU land use designation (page 24). That statement is misleading and inaccurate. The Land Use Element is much more complex than a land use designation. For example, General Plan LUP-3.11 states: "**Zoning Inconsistency**. Zoning is consistent with the General Plan if it is compatible with the objectives, policies, general land uses, and programs specified in the plan. (Cal. Gov't Code, § 65860(a)(2).) Zoning is compatible with the objectives, policies, general land uses, and programs specified in the plan if, considering all its aspects, it will further the objectives and policies of the general plan and not obstruct their attainment. (See also Sacramento City Code, § 17.104.100.C, as may be amended.)" In this case, the Project is not consistent with the Alhambra SPD, and therefore cannot be consistent with the General Plan. Also, General Plan LUP-4.1 states, in support of infill development such as that proposed by the Project: "**Transit-Supportive Development**. The City shall encourage increased residential and commercial development intensity within ½-mile of existing high-frequency bus stops and existing and planned light rail stations, bus rapid transit stations, and commuter rail stations to support more frequent, reliable transit service and vibrant, walkable neighborhoods." In this case, the Project is not within ½ mile of a high-frequency bus stop or rail station, bus rapid transit station or commuter rail station. General Plan LUP-4.6 is also clear:

"**Compatibility with Adjoining Uses**. The City shall ensure that the introduction of higher-intensity mixed-use development along major arterial corridors is compatible with adjacent land uses, particularly residential uses, by requiring features such as the following:

- Buildings set back from rear or side yard property lines adjoining single-unit dwelling residential uses;
- Building heights stepped back from sensitive adjoining uses to maintain appropriate transitions in scale and to minimize impacts to privacy and solar access;
- Landscaped off-street parking areas, loading areas, and service areas screened from adjacent residential areas to the degree feasible; or
- Lighting shielded from view and directed downward to minimize impacts on adjacent residential uses."

In this case, the proposed Project is not consistent with the General Plan, since it exceeds the requirements of the Alhambra SPD relating to height; does not provide setbacks from sensitive single unit development; and does not step back from sensitive adjacent uses. Contrary to the statement in the IS, since the Project is located in an area protected by the Alhambra SPD, the Project cannot have been "generally anticipated in the General Plan MEIR," since the Alhambra SPD existed at the time the MEIR was written, and its concepts and purpose are clearly reflected in General Plan policy. Therefore, the IS's conclusion that impacts related to scenic resources would not exceed those anticipated by the City is wrong, and impacts will be significant.

In addition, because the IS relies on the allowance that the Project is located in an urban area, the impacts associated with visual character must be analyzed on the basis that the project would or would not conflict with applicable zoning and other regulations governing scenic quality. In this case, the Project does not comply with General Plan Land Use policies relating to the preservation of existing neighborhoods when infill development is proposed, and does not comply with the 35-foot height limit imposed in the Alhambra SPD's residential buffer zone. The presence of a 68-foot building, which exceeds the 65 feet allowed (the IS continues to falsely claim that the building is 63 feet in height – see discussion of any part of a building being limited to 65 feet above), and the 35-foot height restriction in the Alhambra SPD cannot be found consistent with Zoning requirements. Furthermore, the IS relies on the granting of the CUP as a means by which the Project can be found consistent. That is also not allowable in this analysis. The CUP is a discretionary permit, which can only be granted if the findings for approval can be made by the Planning Commission. Here, the IS pre-supposes that these findings

can be made because the project will go through the Site Plan and Design Review process, without providing any substantial evidence that the CUP will have no impact on zoning requirements. Without a thorough analysis of the impacts of the CUP on the surrounding single family neighborhood and the purpose of the Alhambra SPD's residential buffer zone, the conclusion must be that the impacts associated with Zoning consistency will be significant.

Finally, as it relates to the discussion of light and glare, the IS falsely states that because the site is currently developed, it experiences light and glare from this existing development. That statement is false. The site is an abandoned complex of buildings which are not lighted, and which do not currently cast light from windows or on-site traffic. The windows are covered in plywood, which eliminates the potential for glare. The IS further states that because the Project must shield its lighting, it will not have significant lighting impacts. However, the IS provides no substantial evidence that the Project's lighting will indeed comply, and since no photometric plan is included in either the IS or the building plans, no such evidence exists. Finally, the IS cites the Citywide Single-Unit Dwelling and Duplex Dwelling Design Guidelines in support of the Project's requirement to limit lighting. What the IS fails to disclose is that the Project is not subject to the requirements of these Guidelines, because it is neither a single family home nor a duplex. The IS fails to demonstrate that the Project will have less than significant impact on lighting and glare, and must be rewritten to analyze and quantify the impacts correctly.

Air Quality

We undertook a comprehensive review of both the IS and the CalEEMod Appendix for the Project, and found serious flaws. First, the IS describes only that construction will last 2.5 years, and that there will be 68,824 square feet of building demolished. There is no description of the time or equipment assumed for site preparation and demolition, grading, building construction, paving, or architectural coating. There is no description of the location of the disposal site for demolition, to substantiate the CalEEMod default of 20 miles used in the model. And most significantly, there is no description of the amount of soil export, the number of haul trips, or the distance of the barrow site for disposal of this soil export. All of this information is needed to correctly assess the air quality impacts of the Project.

In our analysis of the CalEEMod outputs, we found that there are the correct number of haul trips assumed for the demolition of 68,824 square feet of building. However, the CalEEMod model includes absolutely no soil export. This is physically impossible for a site where a garage will be dug 10 feet underground, and superpads or piles will be required to support a 6 story building. Based on our analysis of the Project plan set (which once again is not properly dimensioned), we estimate that the Project will excavate, at a minimum, an area of 25,000 square feet to a depth of at least 10 feet. The Project proposes a finished floor at 20.6 feet, and the site's existing topography is 20 to 22 feet, so none of the excavated soil is planned for redistribution on the site. This results in 9,259 cubic yards of soil that will need to be removed from the site. The amount is likely to be higher, when foundations and/or piles are added for the building. These 9,259 cubic yards of soil will need to be hauled off-site. A dump truck holds 16 cubic yards of material. Therefore, the Project will require 579 one way trips (1,157 trips to and from the disposal site) over an unknown period of time by multi-axle, diesel fueled trucks operating immediately adjacent to sensitive receptors. However, the CalEEMod assumptions, Section 5.3.1 show 0 hauling vehicles during the Grading phase, when soil export would occur. The IS therefore, significantly underestimates the air quality impacts associated with excavation of the garage on the site, and the CalEEMod model must be rerun to assure a correct quantification of the air quality emissions that will impact this highly developed single family neighborhood.

The discussion of TACs and DPM is also incorrect. First, it does not account for the high concentration of haul trucks waiting to be filled adjacent to sensitive single family homes during the Grading phase, as described above. Second, it does not consider, or even mention, the location of the Project immediately adjacent to the freeway corridor. The residents of the Project will be exposed to high concentrations of

DPM emanating from the freeway, located less than 200 feet to the west of the Project. The professional standard by which air resources boards require operational Health Risk Assessments (HRA) is for projects located within 500 feet of a freeway. In this case, the Project residents will be located much closer, but the IS did not consider their exposure, or prepare an operational HRA to demonstrate what the long-term exposure to TACs and DPMs will do to residents' cancer risk. Such an omission is unacceptable, and does not allow decision makers to consider that they are potentially placing future City residents in a position where their risk for cancer will exponentially increase. The IS must be rewritten to include an operational HRA.

Cultural Resources

The IS limits its discussion of historic resource impacts to the structures associated with the Puerta Sausage Factory, and whether the proposed Project would impact these structures. The analysis, however, ignores the context and neighborhood in which the Project is located, and limited itself to only the Project site. This is insufficient to analyze the impacts of this Project.

In order to assess the sufficiency of the technical report contained in Appendix A of the IS, Citizens commissioned Historic Environment Consultants (HEC) to review the report and assess its findings (Attachment 1). HEC's analysis shows that the study prepared for the Project is too narrow in scope to address the impacts of the Project on historic resources.

CEQA guidelines state that the term "historical resources" applies to any such resources listed in or determined to be eligible for listing in the California Register of Historical Resources, included in a local register of historical resources, or determined to be historically significant by the lead agency (Title 14 CCR §15064.5(a)(1)-(3)). Regarding the proper criteria for the evaluation of historical significance, CEQA guidelines mandate that "generally a resource shall be considered by the lead agency to be 'historically significant' if the resource meets the criteria for listing on the California Register of Historical Resources" (Title 14 CCR §15064.5(a)(3)). A resource may be listed in the California Register if it meets any of the following criteria:

(1) Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.
(2) Is associated with the lives of persons important in our past.
(3) Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values.
(4) Has yielded, or may be likely to yield, information important in prehistory or history. (PRC §5024.1(c))

It is important to note that the requirements apply equally to areas eligible for listing as those that are listed.

In this case, as clearly demonstrated in Attachment 1, the Project is located in an area which qualifies for listing in the Sacramento Register of Historic & Cultural Resources, the California Register and the National Register of Historic Places. The analysis conducted by HEC found that the area bounded by B Street, E Street, Alhambra Boulevard and 33rd Street holds a high concentration of homes (84%) built before 1930 in the Craftsman and Period Revival styles. The area, identified as Casa Loma Terrace when it was developed, represents an historic neighborhood in Sacramento. The Casa Loma Terrace neighborhood qualifies for local listing under criterion (2), insofar as the area is clearly associated with its developer, Daniel Carmichael, who served two terms as Mayor of Sacramento; and with John Guisto, a major contributor to agricultural activities in the Sacramento region, who lived in the neighborhood from 1893 to 1962 in a 1893 Queen Ann home which still exists in the neighborhood. The neighborhood also qualifies under criterion (3), because Casa Loma Terrace's homes "embody the

distinctive characteristics of Craftsman and Period Revival homes built before 1930." Because Casa Loma Terrace is eligible for listing in the City's register, the California Register and the National Register of Historic Places, CEQA requires an analysis of the impacts of the Project on this neighborhood, and the IS cannot limit its analysis to the structures on the Project site. As described by HEC, the Project is incompatible with the neighborhood, and will introduce an urban project into an historic district of Sacramento. This represents a significant impact that has not been analyzed in the IS. As a result, the document is incomplete, and must be rewritten.

We also note that the analysis in the IS and in Appendix A relies heavily on the "character defining features" of the existing buildings to describe how the Project will be historically compatible (brick construction, multi-panel windows, for example). We find it incomprehensible that the character defining features of "one-story massing" and "one- and two-story massing" identified in the report are ignored in the IS. The IS asserts that the Project will not impact historic resources because it "would specifically retain and incorporate the character-defining features identified in the HRE…" It fails to note or analyze, however, how only some of those character-defining features have been incorporated, while others are ignored. The analysis is clearly written to accommodate the Project, not to provide an impartial study of the impacts to a historic resource.

Finally, although the IS identifies a potential impact associated with buried archaeological resources, Mitigation Measure V-1 is unenforceable and therefore infeasible. The measure calls for the immediate cessation of construction activities if cultural resources are uncovered during construction. However, without either a professional monitor on-site, or a thorough and comprehensive workers' education program, it is almost certain that the operators of the bulldozers, loaders and graders will have no knowledge or understanding of what a cultural resource could look like. As a result, cultural resources, if they occur on the site, will be obliterated by grading personnel. The same is true of Mitigation Measure VII-3, which parrots the cultural resource measure – construction personnel will not know what a paleontological resource looks like, and the measure is infeasible. Therefore, impacts to cultural and paleontological resources remain significant, and have not been mitigated to less than significant levels.

Greenhouse Gases

As described at length in the discussion of Air Quality impacts above, the Project's CalEEMod analysis fails to incorporate at least 1,157 trips two and from the disposal site by haul trucks for soil export. The GHGs created by these trucks are substantial, and given the Project's generation of 861 MTCO2e, only 239 MCTO2e below the SMAQMD threshold, may be significant if correctly analyzed. Because of this deficiency, it is not possible to determine whether the Project will have significant GHG construction impacts, and the IS must be rewritten when the CalEEMod model has been re-run.

In addition, the analysis of CAAP compliance in the IS is wholly insufficient. The IS refers to "various measures related to new development" that would apply to the Project, but addresses none of them. Instead, the IS admits that its analysis is for "general consistency" (page 68) and not for Project specific analysis. A proper analysis of CAAP measures is required to provide substantial evidence that the Project will not impact GHG reduction efforts in the City, and the Project's need to be all-electric, which is the only measure mentioned in the IS, is insufficient to support such a conclusion. Finally, the IS again relies on the Project having been considered in the General Plan MEIR for its significance determination. As described above, if the General Plan MEIR considered the Project at all, it considered a three-story structure on this site, and the Project proposes twice that size. By extension, the Project, therefore, will generate twice the operational long term GHGs as were considered in the General Plan MEIR, and there is no evidence that those emissions would be less than significant.

Hydrology & Water Quality

The discussion of stormwater management in the IS is wholly inadequate. The Project occurs within the City's Combined Sewer System (CSS), where both stormwater and sanitary sewage is discharged into the same pipe. The CSS is over-capacity, and as a result the City has partially implemented facilities to offset its deficiencies, including a sewer vault beneath McKinley Park. The discussion contained in the IS does not quantify the stormwater flows associated with the Project, which will necessarily increase with the addition of large expanses of roof and the complete covering of the site with impervious surfaces, nor does it consider whether the CSS has current capacity to accommodate these flows. This is critical in this case because if there is not sufficient capacity, which is known to be the case, the Project will impact waste discharge requirements, by increasing the potential for contaminated overflow in City streets during storm events. The Project's compliance with City requirements, used in the IS to solve all problems, does not demonstrate whether the Project will have an impact, or whether that impact can be mitigated. The standard quoted specifically states "drainage impacts resulting from the improvement or development shall be fully mitigated." There is no analysis or mitigation provided in the IS. It simply defers analysis and mitigation. This is not allowed under CEQA, and must be addressed. Please also see discussion under Utilities, below.

As it relates to water demand and supply, the IS once again does not quantify the Project's water demand, or provide substantial evidence that the City has sufficient water supply under normal, single dry or multiple dry years. Instead, the IS once again asserts that the Project's consistency with the General Plan assures that no impact will occur. As described above, the General Plan MEIR would have considered a project half the size of the proposed Project, since the Alhambra SPD would apply to this site. The assumption made by the IS, without supporting facts, cannot be used to declare the impacts less than significant. A proper, quantified analysis of Project impacts to water resources must be prepared.

Land Use & Planning

The analysis contained in the IS relating to the Alhambra SPD is flawed and incorrect. The analysis concludes that the Project qualifies for an exclusion to the height limitation of 35 feet by using incorrect information. As described above, the height limits associated with the C-2 zone apply to any "portion of a building." In this case, the building is 68'2', and exceeds the maximum allowed height of 55 feet within 40-79 feet of a R-1 zone. Even if the City were to argue that the building is 80 feet or more from the R-1 zone, the limitation would still be 65 feet for any "portion of the building," not for the roof and excluding the parapet. The parapet is a "portion of the building." The Project therefore exceeds the City's own Zoning standards. The IS does not address specific text in 17.420.020 that has direct applicability to the Project, including:

17.420.020.B.1.: General rule. Except as provided below, development located within 300 feet of a residential zone (measured from the street centerline) shall not exceed 35 feet in height. This restriction is intended to establish a buffer zone to protect residential neighborhoods from visual intrusion by new development that is out of scale with the adjacent residential neighborhood. (emphasis added)

17.420.020.B.2.: Exception. The planning and design commission may approve a conditional use permit allowing additional height, provided that the height may not exceed the limits established by the applicable base zoning chapter. To approve the conditional use permit, the planning and design commission must find that the development will not be out of scale with the adjacent residential neighborhood. An example where the intent of the buffer zone is maintained while allowing additional height is a development incorporating design features or step-backs that reduce the walled effect on adjacent smaller-scaled residential development. (emphasis added)

In this case, the building exceeds the height allowed in the base zone, because the building exceeds 65 feet (where the roof is located is irrelevant, per 17.216.720). It therefore does not even qualify for an exception. Further, the building rises straight up from the east property line on Alhambra Boulevard, with only a 10 foot step-back at the 3rd level, which will be imperceptible at the street level. That extends through the 4th level, to a height of 43'4", where a further unquantified step-back occurs for the 5th level. Given that this step-back occurs 45 feet off the ground, it will also not be perceptible from the residences to the east, in the residential buffer zone. None of this analysis is included in the IS. It simply concludes that the Project qualifies for the CUP, and that there is no conflict with Zoning. Further, as described above, the Project is inconsistent with General Plan Land Use Policy 3.11 and 4.6, and thus inconsistent with the General Plan. Clearly, as described here, the impacts of the Project on General Plan Policy and Zoning requirements are significant and unmitigated.

Transportation

Again, as stated above, the IS relies on the unfounded assumption that the Project would have been analyzed in the General Plan MEIR because it is consistent with the land use designation. Again, as repeatedly described above, we challenge that assumption. The Project would have been limited to 35 feet, or half its current size, and would have contained half the units currently proposed. Therefore, the trip generation for the Project would have been half of the 2,637 weekday trips, 3,300 Saturday trips, and 2,558 Sunday trips identified for the Project, and only mentioned in Appendix B, the CalEEMod model runs. Although it is clear that CEQA no longer requires trip generation as a metric, the City is still obligated to consider whether the Project is consistent with General Plan policy. In this regard, at a minimum, the IS must analyze whether the Project will impact any of the General Plan's policies relating to street design and safety, including M-3.1 through M-3.3, and M-4.1 through M-4.4. In this case, the Project will impact local streets, decrease traffic safety, and not mitigate its impacts through traffic calming, as is required in the General Plan. Therefore, the analysis in the IS is insufficient and must be revised.

Finally, the IS does not address the fact that the Project is described as an infill mixed use project throughout the document, but that in fact it is not located within ½ mile of either a rapid transit stop or a rail station. This inconsistency with General Plan policy is not addressed in the IS, making the discussion of alternative transportation insufficient.

Utilities & Service Systems

The discussion of water supply is inadequate, as discussed under the Hydrology & Water Quality section above. The Project is not consistent with the General Plan, would generate twice the development allowed on the site under the Alhambra SPD, and water demand and supply must be quantified.

The discussion of wastewater and sanitary sewer is also insufficient, based on the Project's location within the CSS. According to the City's own estimates, residential units generate 310 gallons of sewage per unit per day. On this basis, the Project will generate 102,920 gallons of sewage per day, to be discharged into an existing 8" CSS pipe which is already over capacity (see Hydrology & Water Resources discussion above). The IS, however, does not consider any of these facts in determining the Project's impacts on the CSS. In this case, the over-capacity conditions require, at a minimum, that the Project construct an on-site sewer vault, in order to be able to control its outflow, particularly during storm events. This option is included in the City's own plans for CSS management, but never discussed in the IS. Further, there is no evidence provided to quantify the size of that facility: that the Project has been designed to include an on-site sewer vault; that the site and Project can accommodate such a facility; or that such a facility would be sufficient to reduce the impacts of the Project on the CSS. The only statement made in the IS is that the Project was considered in the General Plan MEIR, and that its

impacts must have been covered in that document. The IS does not address, however, two critical General Plan policies as they apply to the Project (emphasis added):

Policy PFS-3.3: Development Impacts. Through the development review process, including through development impact fees and offsite improvements constructed by new development, the City shall ensure that adequate public utilities and services are available to serve new development.

Policy PFS-3.6: Combined Sewer System Rehabilitation and Improvements. In keeping with its Combined Sewer System (CSS) Long Term Control Plan (LTCP), the City shall continue to rehabilitate and improve the CSS to decrease flooding, CSS outflows, and Combined System Overflows (CSOs). Through these improvements and requirements for new development, the City shall also ensure that development in the CSS area does not result in increased flooding, CSS outflows or CSOs or reduce the overall percentage of flow routed to the Sacramento River Water Treatment Plant (SRWTP).

There is no substantial evidence provided in the IS that the Project has been designed to comply with these policies, and no evidence that it will not increase flooding or CSS outflows. The IS must be rewritten to address these impacts.

3. There is Substantial Evidence that the Impacts of the Project are Significant and Unmitigated

As described above, there is substantial evidence that the City has not mitigated the impacts of the proposed Project, and that significant impacts will occur. When presented with substantial evidence, the City is obligated to prepare an Environmental Impact Report (EIR). At a minimum, the City must require that the deficiencies in the analysis be cured, that an EIR be prepared, and that the EIR be circulated for public review. In addition, unless the City can provide adequate mitigation, including a reduction in the height and intensity of the proposed building, the City may need to consider and prepare findings and a statement of overriding considerations for significant and unmitigable impacts of the Project.

Sincerely,

Nicole Sauviat Criste
Principal

Attachment 1

Historic Environment Consultants

Preliminary evaluation of the historic significance of the Casa Loma Terrace neighborhood

Historic Environment Consultants May 20, 2025

This report is partly in response to the report produced by Groundwork Preservation LLC for Demas Enterprises on September 27, 2024. The project proposes to put a 6-story apartment complex, covering nearly an entire city block, and having 332 rental units. However, this report also seeks to take a much deeper look at the historic significance of the surrounding neighborhood, primarily Casa Loma Terrace and a few other properties.

This preliminary survey identified an Area of Potential Effect (APE) that needs to be studied to determine what effect this project will have on adjacent historic resources.

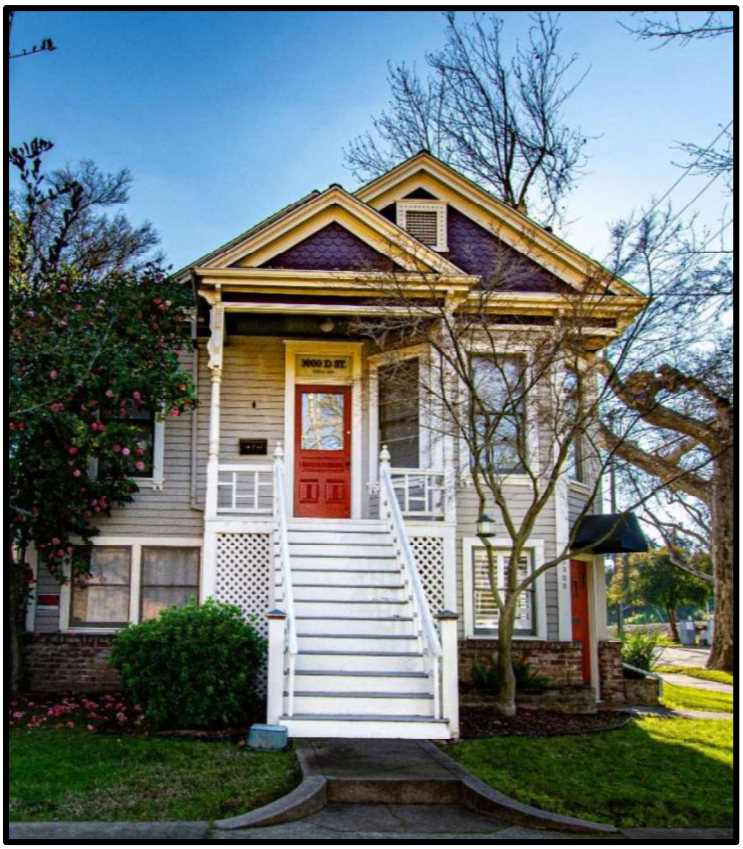


Figure 1 – 403 30th Street. Photo by Don Cox (HEC).

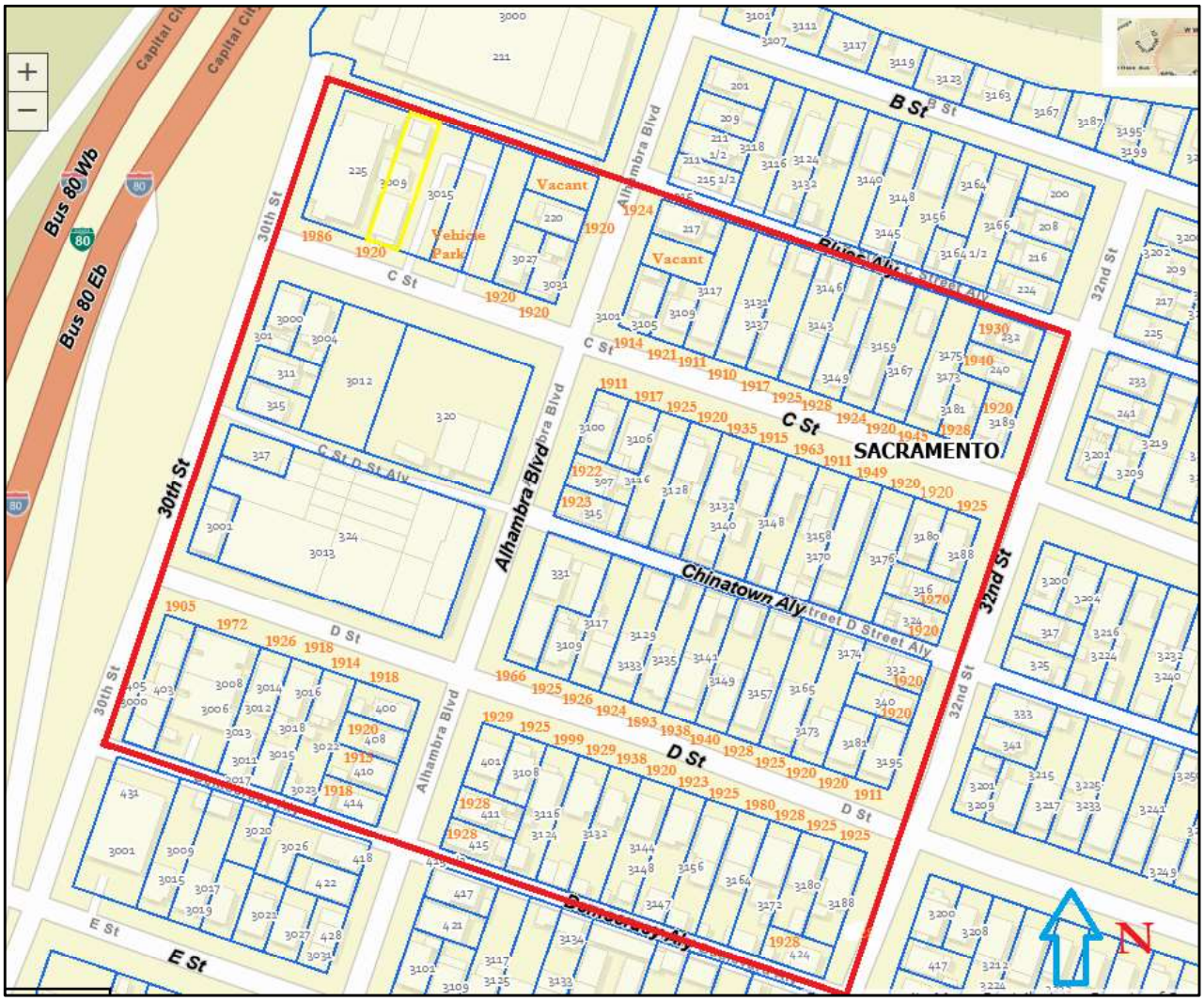


Figure 2 - Area of Potential Effect - Assessor's Map, data provided by HEC

What this preliminary survey intends to show is that this area (the APE) and perhaps all of Casa Loma Terrace is an historic resource.

This report also suggests what is being proposed as "mitigation" for loss of the Pureta Sausage Factory and Mary Ann's Bakery is inadequate.

Casa Loma Terrace

Figure - A handful on Queen Anne houses are mixed in with the later craftsman and period revival cottages. Photo by Don Cox (HEC).

The Casa Loma Terrace development encompasses all the properties from B to E Street and from Alhambra to 33rd Street. In addition, there is a strip of houses on the North side of B Street between Alhambra and 33rd Street. What strikes one during a site visit to the APE is the heavy concentration of one and two-story houses that are Craftsman or Period Revival. Using dates collected from County Assessor's Parcel Viewer reveals that of the 73 housing structures inside the APE, 61 were built before 1930 (84%). Within those 61 housing structures are three Queen Anne houses, two of which predate the development, 403 30th Street (1905) and John Guisto's 1893 house.

Figure 3 – There is a heavy concentration of Craftsman and Period Revival houses throughout the APE, which represents 84% of the housing. Photo by Don Cox (HEC).

The development began after local farmer and rancher John A. Guisto sold his property to the Carmichael Company sometime around 1910. An article appeared in

the Sacramento Bee, on October 15, 1910, p. 12 announcing the opening of the new subdivision. The lots could be reserved, but Carmichael promised he would turn them over to new owners when streets were paved, and curbs and sidewalks were in place. Later that month, Carmichael announced that sales of lots would begin [Bee Oct. 24, 1910, p. 10]. In that ad he mentions, "…some very choice ones have been resold." He concludes the ad with, *"Don't miss this opportunity. You can double your money in two years and perhaps before."* Encouraging this kind of speculative buying was not a good idea. It had been experienced in other developments and proved to slow down the building process. Oak Park was one example [Survey of Oak Park, Historic Environment Consultants, 2007]. Some developers later employed the tactic of placing a minimum cost for houses that could be built, as well as the expectation that building would commence within an established time frame. If building had not begun, the developer retained the right to reclaim the property [HEC National Register Nomination, Montgomery Way]. This may explain why so many homes in Casa Loma Terrace were built in the 1920s rather than in the teens.

Figure 3 - Daniel Carmichael. Photo from Willis, p. 444..

At about the same time Casa Loma Terrace was developing, Carmichael was selling 10-acre home-and-farm parcels in his signature development, Carmichael Colony. It was composed of 4,000 acres of the former Rancho San Juan Land Grant [Reed, p. 813]. The large, suburban district in eastern Sacramento County that bears his name now has an estimated 80,000 residents in a 15.5 square mile section of the Sacramento suburbs Bee, 1/24/2025 in p. 1, 2 in Real Estate Classified].

In 1907, the Sacramento Union newspaper commented on the Carmichael Company and stated that, *"This firm probably handles more property, both city and country, than any other realty concern…The firm enjoys the business of many large commercial and industrial interests."* [Union, 2/3/1907, p. 12].

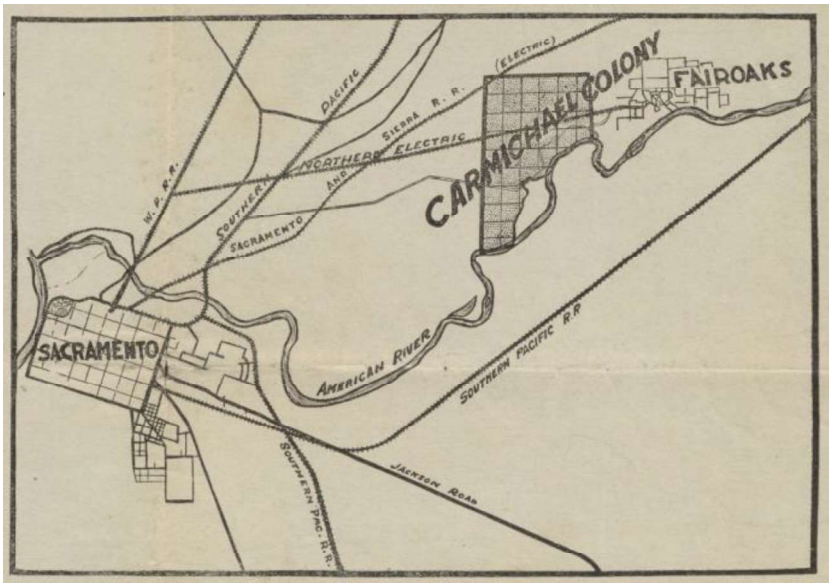


Figure 4 - A 1909 map showing the location of Carmichael Colony No. 1 (Willis, p. 447).

In his obituary, the Bee stated that, *"Carmichael was a pioneer among Sacramento real estate men and active in civic affairs during his long residence in the Capital City. He served as county treasurer and as president of the Sacramento Chamber of Commerce, as well as filling the office of mayor."* [11/2/1936, p. 2]

He also served as City Treasurer and had two terms as Mayor [Bee 11/2/1936, p.2]. He was twice elected as a delegate to the Democratic National Convention. Carmichel was also one of the pioneer developers of the Kern County oil fields. He also founded an oil and gas company.

Figure 5 - The home of Daniel Carmichael at 1903 21st Street. Photo by Don Cox (HEC).

John Guisto

Published in the Bee [4/24/1950, p. 4], the newspaper headlined John Guisto's obituary with *"Services Are Set For Asparagus Pioneer."* The Bee went on to state, *"He operated a farm in the vicinity of D and Thirty First Streets, and it was there he introduced to the Sacramento area the growing of asparagus in 1890."*

As one peruses the fruit label collection of James Henley at the Center for Sacramento History, one realizes that asparagus growing and packing was a lively part of the agribusiness economy. There were several well-known growers and packers involved in its production.

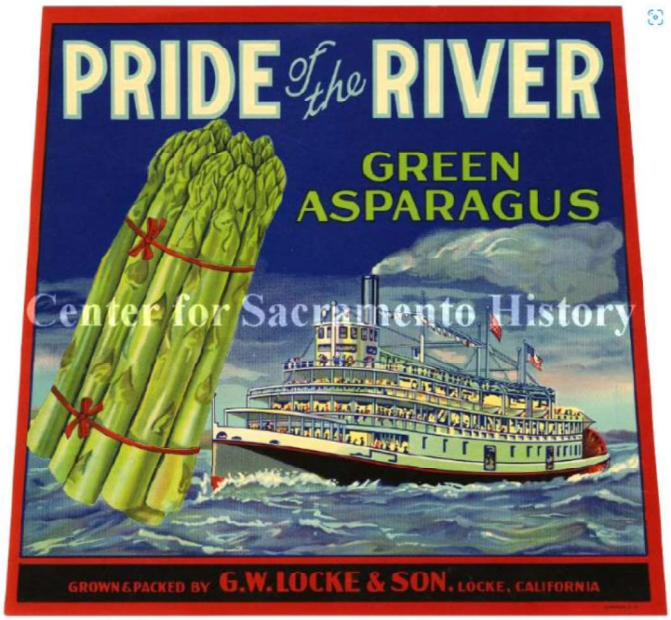


Figure 6 - Asparagus labels courtesy of the Center for Sacramento History.

Guisto's parents arrived in the Sacramento area in the early 1860s from Genoa, Italy. John Guisto was born in Sacramento in 1863.

Guisto sold his property near D and 31st Street (now Alhambra Boulevard) in about 1909. However, he had other plots of land and continued to farm until 1930.

John Guisto and his wife, Mary, built a house on the property at 3135 D Street in 1893. John lived there and died there in 1950. Mary lived there until she died in 1962. Her obituary credits John as, *"…one of the first asparagus growers in the Sacramento Valley."* [Bee 9/14/1962, p. 29]

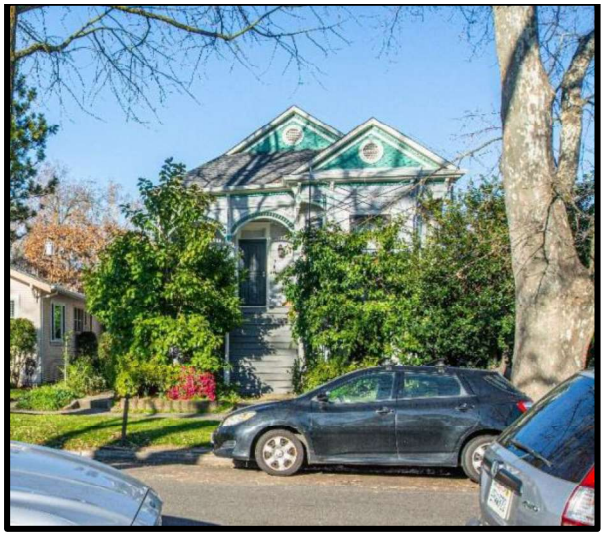


Figure 7 - The 1893 Queen Anne house built by John and Mary Guisto still graces the neighborhood of Casa Loma Terrace.

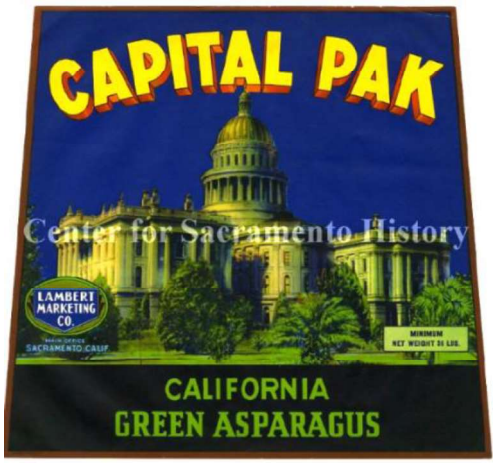


Figure 8 - Asparagus labels courtesy of the Center for Sacramento History.

Conclusions

The residential housing in the APE meets two of the criteria for listing in the Sacramento Register of Historic & Cultural Resources.

It meets Criteria ii – they are associated with the lives of persons significant in the city's past; and iii – they embody the distinctive characteristics of a type, period, or method of construction.

Criteria ii

The Casa Loma Terrace development is associated with its developer, Daniel W. Carmichael, and his company, the Carmichael Company. He served two terms as Mayor of Sacramento, two terms as County Treasurer, a term as City Treasurer, and was a president of the Sacramento Chamber of Commerce. He and his firm were recognized by the Sacramento Union by stating, *"This firm probably handles more property, both city and country, than any other realty concern."* He also has the major suburb of Carmichael named after him.

Figure 9 – Mural in Carmichael Park, photo by Don Cox (HEC).

Casa Loma Terrace is also associated with John Guisto who was responsible for introducing the growing of asparagus to the Sacramento Region. Many growers and packers joined the movement. Asparagus growing became a vibrant component of the Sacramento Valley agribusiness sector. John and Mary Guisto continued to live in the neighborhood from 1893 to 1962, almost seventy years. Their 1893 Queen Anne home still graces the neighborhood.

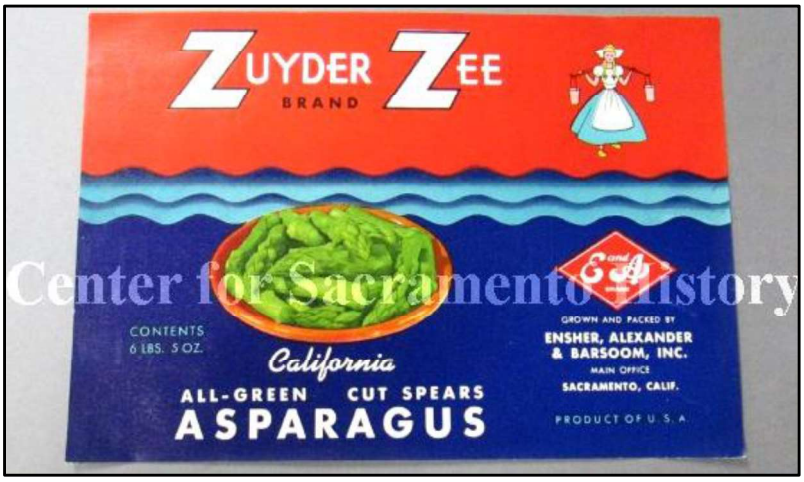


Figure 9 - Asparagus labels courtesy of the Center for Sacramento History.

Criteria iii

The homes in the APE and throughout Casa Loma Terrace embody the distinctive characteristics of Craftsman and Period Revival homes built before 1930. The neighborhood has a heavy concentration of these homes and there have been relatively few changes and alterations. In the APE, 84% of the houses fit this definition. The same percentage prevails throughout Casa Loma Terrace. All these properties could become contributing resources to a potentially larger historic district.

This APE meets the criteria to be eligible for designation as an historic district in the Sacramento Register, California Register, and the National Register of Historic Places.

The proposed 6-story project is inappropriate and incompatible in this historic residential neighborhood. The homes in the district are one and two-story. The massive development project will tower four to five stories above that. Designed to be some 68 feet high in a district with a zoning code limit of 35 feet, this new project will tower over the tree-tops and will be seen for some distance. Introducing an urban-style project into a residential historic neighborhood at C Street east of Alhambra Boulevard is problematic. C Street is a major access road for neighborhoods north of E Street, including the commercial office buildings at the historic former American Can Company complex and McKinley Village.

The proposed 6-story project is 68 feet tall

Traffic and Parking

There is a steady volume of traffic in the APE along 30th Street, Alhambra Boulevard, and C Street which is highly evident during a site visit. It is particularly constricted, gridlocked, and untenable as the Elvas Expressway pours into this narrow residential historic neighborhood at C Street east of Alhambra Boulevard. For what should be a quiet residential neighborhood, the traffic is already extremely excessive. Parents with small children should not let them play in the front yard unless closely supervised. Add to that chaos, a 332-unit apartment complex. Using metrics provided by Preservation Sacramento, 332 dwelling units will add about 450-500 daily vehicles to local traffic. What may well happen is that when traffic on C Street gets heavier, some vehicles will begin using D Street. Half a million vehicle trips yearly added to an already overcrowded street system with little street parking available, is unacceptable. H Street already carries freeway volumes as the report in Appendix 1 shows, and it is gridlocked during daily commute hours. Bringing in more cars completely overwhelms the already unsafe volumes in East Sacramento.

Even with 322 parking spaces in the garage, the spillage will fill the local neighborhoods. This is not a transit-oriented housing project. There is no RT train station nearby and the closest bus line is a 6-block walk to J Street. Using C Street, Alhambra Boulevard, and the Camelia City Freeway for high volumes of traffic make this heavily congested vehicle area even worse within this older, historic, park-centered neighborhood.

Figure 10 - On a random site visit, the photograph above shows three cars heading east on C Street at Alhambra Boulevard as well as on coming south on Alhambra.

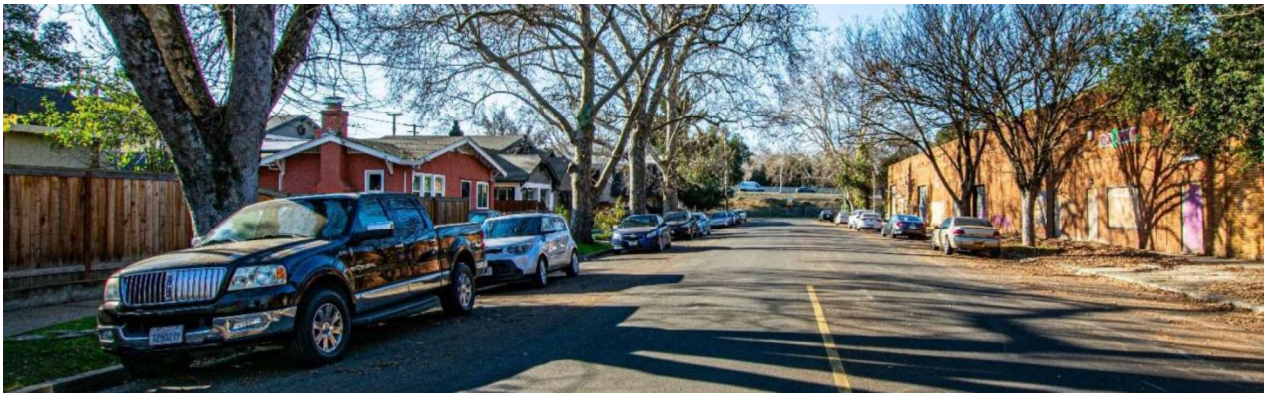


Figure 11 - In this photo, even though parking is available in the rear, there are seventeen cars parked on the stree. Photo by Don Cox (HEC).

Conclusions

Traffic in this potential historic district is already excessive on C Street and Alhambra Boulevard. It is projected that this oversized, out of scale, 6-story development with some 332 apartments producing as many as 450-500 vehicles making several trips a day, will generate an additional half-million vehicle trips a year through these neighborhoods.

Parking is inadequate and the overflow will spill into the APE. There is no mass transit option readily available. The location of this project along existing east-west streets makes it a car-centric project. Parking and traffic problems will make the historic APE a less desirable place in which to live, and it is likely that property values will fall. So far, this commentary has only focused on the traffic and parking problems that will be created by the residents. There will be additional traffic and parking problems. Service and supply trucks will need to have a place to park. So will all the friends and family who show up to visit the residents of 332 apartments. The problems of parking, traffic, and sewage will also have a negative effect on McKinley Park, which is listed in the National Register of Historic Places.

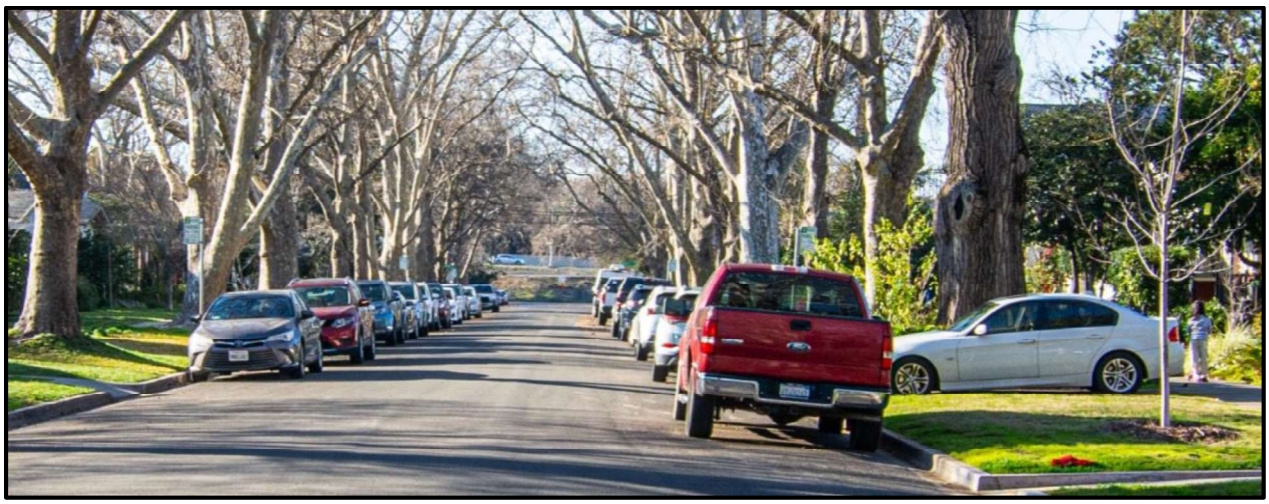


Figure 12 - Streets in Casa Loma Terrace already have traffic and parking problems, photo by Don Cox (HEC).

Sewage

Before recent work on the underground sewage storage vault at McKinley Park, heavy storms forced the combined sewage and storm water system to overflow and would send raw sewage floating down the low-lying streets, yards, and basements. Adding the proposed large-scale development project will contribute to the ongoing sewage issues, already difficult and dangerous, as experienced by residents in nearby McKinley Park neighborhoods.

Mitigation

The mitigation measures called for by Groundwork are incomplete. Just retaining some existing brick walls and incorporating them into a new structure is insufficient. Without accompanying plaques, photos, and displays the entire significance of the old building is completely lost. Otherwise, the presence of the brick walls merely looks like

decoration on a new building. Also, if you look closely at the plan elevations, the historic brick façade will be punctured by several new doorways and windows.

Figure 13 - A 1948 obituary for part-owner George Wurster named Pureta Sausage Co. as "…one of the largest firms of its kind on the Pacific Coast." [Bee, August 28, 1948]. By 1957 Pureta had expanded its truck fleet to 50, and was employing up to 200 people. Photo courtesy of the Center for Sacramento History.

*Figure 14 - Notice that they weren't packaged as Ball Park Franks, but **Pureta** Ball Park Franks! (Photo courtesy of the Sacramento Center for History.)*

Conclusions

The proposed mitigation for this 6-story development is inadequate. As proposed, it is nothing but facadism. Unless an effort is made to display the history and importance of the Pureta Sausage Company, its significance will be lost forever.

Casa Loma Terrace

Casa Loma Terrace meets two of the most important criteria for listing in the Sacramento Register of Historic and Cultural Resources. It has a significant concentration of craftsman and period revival homes built before 1930 (84%). It is also associated with people who were significant in Sacramento's history (Daniel Carmichael and John Guisto). The proposed project negatively impacts the health and safety of residents, and will destroy the character of this neighborhood and make it a less livable area.

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May 22, 2025

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RE: *Initial Study/Mitigated Negative Declaration* report for the Alhambra Blvd. Redevelopment Project (P24-007)

Mr. Ron Bess,

I am submitting comments in response to the recently published *Initial Study/Mitigated Negative Declaration* report for the Alhambra Blvd. Redevelopment Project (P24-0070). This project, if developed as proposed, will have numerous significant negative environmental impacts on the surrounding neighborhood. Below, I outline the primary concerns associated with the project:

1) Size and Density

The proposed 332-unit apartment complex would be one of the largest of its kind in this Sacramento area. Its scale is incompatible with the historical residential character of East Sacramento, where 100-year-old Tudor, Craftsman, and Bungalow-style single-family homes define the neighborhood.

This massive six-story, 440,390-square-foot development would occupy over 2.5 acres—an entire city block—in a predominantly single-story, family-oriented community. The project's building intensity and population density would far exceed existing conditions in the area. At full occupancy, the complex is expected to house approximately 870 residents. Notably, nearly 80% of the units would be one bedroom or smaller, making it unlikely that many families would live there.

The proposed apartment complex features minimal setbacks, instead incorporating private balconies and large outdoor rooftop lounges that overlook neighboring homes and a small two-story apartment complex. These design elements could create privacy concerns and disrupt the residential atmosphere of the area.

2) <u>Height and Neighborhood Character</u>

The project is seeking a conditional use permit to exceed the 35-foot maximum height limit established under the *Residential Preservation Transition Buffer Zone* in the Alhambra Corridor Special Planning District (SPD). When the SPD was established in 1992, its purpose was to maintain and enhance the character, quality, and vitality of the neighborhoods, yet this proposed development disregards those principles. Under SPD regulations, buildings are not allowed to exceed 35 feet in height and should maintain a minimum distance of 300 feet from a residential zone. This project does not adhere to either of these standards, reaching a height of 68 feet 2 inches, with the nearest residential zone situated just across the street.

In 2016, modifications were made to the SPD with the goal of promoting public health, safety, convenience, and welfare by facilitating infill housing that enhances community character, supports transit use, and fosters pedestrian-friendly neighborhoods. However, this proposed project accomplishes none of those objectives. Furthermore, the design is largely generic, virtually indistinguishable from other developments by HRGA Architects, making it a poor fit for the area's unique and historic character.

The site plan and design review checklist for the Alhambra Corridor neighborhood, which was prepared by HRGA Architects, contains numerous inaccuracies. Critical factors such as excessive massing, lack of appropriate scale, and a failure to respect the architectural character and rhythm of adjacent single-family homes should have warranted a halt to this project during the initial review phase. Instead, the city has opted to disregard these concerns.

3) <u>Air Quality, Traffic, and Transportation</u>

The proposed development includes a 322-space parking garage. It fails to promote public transit use because there is a lack of viable public transportation options in this part of Sacramento. The nearest light rail station is more than a mile away, and the closest bus route operates just once daily in each direction between downtown and Sacramento State. Another bus line, farther out, primarily serves Arden Fair and Consumnes River College, while yet another is over half a mile away, adding to the challenge of accessing reliable transportation. Given these transit limitations, this development fails to align with the principles of transit-oriented infill development outlined in the 2040 General Plan.

This project is situated adjacent to one of the most congested segments of Business 80 Highway, within an area suffering from the worst pollution burden in Sacramento. The off-ramps and on-ramps at McKinley Blvd (E Street), H Street, and J Street are notorious for heavy traffic, often requiring drivers to wait through three to four light cycles before accessing the freeway or going downtown. This congestion has led to frequent red-light running, creating hazardous

conditions for both drivers and pedestrians. Over the years, traffic in East Sacramento has become increasingly dense, dangerous, and unsafe for residents of all ages. Future development in the River District and Railyards—expected to double the size of downtown—will only exacerbate East Sacramento's traffic congestion.

The proposed project's parking garage entrance and exit are located on 30th Street between C and D Streets. Since 30th Street is a one-way road running north from T Street to D Street, all 870 residents with vehicles would be funneled through C or D Street to go anywhere in the neighborhood. C Street, the only roadway that crosses 33rd Street for eastbound travel, is extremely narrow and frequently congested due to its proximity to major arterial roads leading East as well as to downtown or the freeway via McKinley Boulevard (E Street). Additionally, the lack of adequate space for bike lanes poses significant risks for cyclists.

Emergency responders have previously struggled with accessibility issues; ambulances, fire trucks, and police vehicles have been delayed on 33rd Street because its narrow width prevents two cars from passing if vehicles are parked on both sides. Similar impediments are found on C Street between 30th Street and 33rd Street.

A recent transportation study conducted for the *Streets for People Plan* concluded that East Sacramento experiences a high level of pedestrian traffic stress. Additionally, H Street and 29th Street have been identified as the second most hazardous location in Sacramento for collisions involving vehicles, cyclists, and pedestrians. Despite this, the proposed project intends to introduce another 870 residents into this already overwhelmed corridor. A comprehensive traffic study should be conducted for the East Sacramento area, spanning J Street to B Street and 29th to 39th Street.

4) Rainwater & Sewage

This project is located within Sacramento's aging 100+ year old combined sewer system (CSS), where stormwater runoff and wastewater share the same pipeline. A recent water and wastewater fund audit highlighted serious concerns, revealing that the system is deteriorating faster than it is being repaired or replaced—significantly increasing the risk of major failures. The study found that approximately 30% of wastewater assets have reached the end of their useful life and should be prioritized for immediate replacement.

Due to the extreme age of many of the wastewater assets, sourcing spare parts has become increasingly difficult, often necessitating expensive custom fabrication. Additionally, the city has experienced substantial staff losses among those with the expertise to maintain the CSS, making it increasingly challenging to find qualified replacements. For decades, Sacramento has relied on a reactive approach to infrastructure maintenance, rather than proactively

addressing issues. Despite recommendations from outside consultants since the 1970's advising that the CSS should be separated, the city has continued to defer action. Furthermore, essential sewage and storm drain asset data—including material composition, size, installation dates, costs, and capacity—are still missing from the city's database, making it impossible to accurately assess the system's condition.

The proposed project would channel sewage and wastewater from 870 residents through an inadequate 8-inch-wide CSS pipeline on the west side of the complex, ultimately linking to a 100-year-old, 10-inch-wide CSS pipe running along 30th Street. Additionally, new 10-inch and 12-inch-wide storm drain lines would merge into an undersized 8-inch-wide CSS pipeline on the east side of the complex along Alhambra Blvd.

In essence, the wastewater generated by this project—comparable to that of the entire population of McKinley Village, which spans 49 acres—would be channeled through century-old infrastructure that is already strained and struggling to meet existing demands.

Global warming is exacerbating these concerns, posing risks to both human health and property through rising average temperatures, increased rainfall, and more extreme weather events. The McKinley Park Sewer Vault was completed in 2021, but during the first rainstorm in October of that year, it quickly reached capacity, causing flooding in nearby streets. Given these conditions, the developer should be required to build an off-line sewer holding tank for wastewater, allowing it to be pumped into the Combined Sewer System (CSS) after storms—just as was mandated for the McKinley Village development. Simply allowing the developer to pay the city a combined sewer impact fee does not adequately mitigate the serious risk of catastrophic sewer overflows and outflows.

The CSS is regulated by the Regional Water Quality Control Board (RWQCB), and the City of Sacramento is required to comply with NPDES Permit CA0079111, which governs wastewater collection and treatment. However, with each permit renewal, RWQCB has gradually relaxed its regulatory requirements, based on assurances from the city that the system is under control—when, in reality, the CSS is barely functioning and is held together with temporary fixes, as the audit report makes clear. This issue persists because the City Department of Utilities continues to regulate and monitor itself, operating without independent oversight. This lack of accountability only exacerbates the ongoing deterioration of the combined sewer system

5) Parks, Recreation & Public Services

This project site is located just one block from McKinley Park, one of Sacramento's premier parks. Although officially designated as a community neighborhood park, the city effectively treats it as a regional park, drawing visitors from across the entire Sacramento region. As a

result, traffic congestion around the park is a recurring issue, with backups occurring almost every weekend. Permits are required to reserve prime spaces in the park because of the excessive demand.

The study asserts that numerous parks are located within a half-mile radius of the site; however, this portrayal is misleading and does not accurately reflect the reality. Sutter's Landing Park is slightly over 0.5 miles away, yet accessing it requires crossing a busy freeway entrance and exit, making pedestrian access difficult and unsafe. The McKinley Village parks are located more than a mile away, beyond the convenient walking distance implied in the study.

According to the 2040 General Plan, Sacramento requires 8.5 acres of parkland per 1,000 residents. Based on this guideline, the proposed project should include 7.395 acres of parkland to accommodate its anticipated population. Instead of meeting this requirement, the study suggests that the developer could simply pay the city a park use impact fee rather than providing actual green space.

This proposal is entirely inadequate. Not only does the developer fail to include dedicated green space, but it assumes that McKinley Park—already overcrowded and overutilized—can absorb an influx of new residents. Ask anyone who lives in the neighborhood, and they will confirm that McKinley Park is frequently overcrowded, poorly maintained, and lacks proper enforcement of park codes. A city park impact fee should not be allowed as a substitute for providing adequate recreational space. The developer could reduce the project's size and incorporate appropriate green space rather than burdening already strained public resources.

6) Hazardous Waste

The site at 324 Alhambra Blvd. has a long history of industrial use, dating back to 1927, when it housed the Puenta Sausage Company until 1969. In 1970, Andrew Demas took over the location and founded Mary Ann's Baking Company, later passing ownership to his three sons—John, George, and Peter—in the 1970s. Around 2006, the bakery was relocated elsewhere in Sacramento, leaving behind potential environmental hazards from decades of industrial activity. The GeoTracker website has a wealth of information about this site.

During Mary Ann's Bakery's operations, delivery trucks were fueled on-site from two underground storage tanks (USTs): an 8,000-gallon diesel tank and a 1,500-gallon gasoline tank in the shipping yard at 324 Alhambra Blvd. Additionally, a 550-gallon underground gasoline storage tank was located at 320 Alhambra Blvd., between the curb and sidewalk by the alley. In 1991, due to its proximity to a large heritage tree, the county allowed Mary Ann's Bakery to abandon the 550-gallon tank in place rather than remove it.

By 1998, all underground storage tanks were legally required to be upgraded or removed. An April 4,1999 letter from the county to Mary Ann's Baking co. revealed that a 1997 tank test showed the diesel tank had failed, it was not retested, the county was not notified, nor was it emptied of its contents as of 2-10-1998. In 1999, the fueling facility was removed, and the two larger USTs (8,000 gallon & 1,500 gallon), dispensers, and associated piping were transported off-site for recycling. Soil samples collected from around the tanks indicated petroleum hydrocarbon contamination.

a) Environmental Cleanup Efforts

In 2000, an initial site assessment detected Methyl tert-butyl ether (MTBE)a gasoline additive known to pose environmental and human health risks, including respiratory, neurological, and gastrointestinal issues, as well as potential liver and kidney damage. MTBE leakage spread beyond the site, extending under Business 80 Highway, with concerns about its impact on groundwater and drinking water supplies.

From 2004 to 2015, remediation efforts included: Soil removal, Installation of an ozone air-sparging curtain and deployment of a soil vapor extraction (SVE) system.

In 2014, the 550-gallon unleaded gasoline tank was filled with a slurry concrete mix and left in place.

b) UST Closure Disputes

In 2015, Mary Ann's Bakery requested UST closure from the County of Sacramento. After meeting with SCEMD & CVRWQCB to consider the closure of the UTS site, based on the new 2012 Low-Threat Underground Tank Closure Policy, the County SCEMD denied the UST closure letter. The bakery hired representation to appeal the decision by the county. Meetings were held in **2016** with SCEMD, SWRCB, CVRWQCB and RP to discuss the Site Conceptual Model (SCM). In **Aug. 2016** the CA State Water Resource Control Board denied the petition by Mary Ann's Baking Co to have the CA State Water Board review the decision by Sacramento County. The State Water Board refused to review the request because it failed to raise substantial issues that are appropriate for a review. In **Sept. 2016** Wallace Kuhl was hired to convince the CA Water Board that it was aggrieved by the cost of conducting work that was unnecessary given the 15 years of investigation and remediation for the plume of MTBE.

In 2017, groundwater testing revealed the MTBE plume had reached the freeway overpass at E Street, raising concerns about contamination of a Caltrans irrigation well. In early **2018,** the CA Water Board signed a UST closure letter, though this closure only addressed petroleum contamination, leaving potential non-petroleum contaminants unaddressed.
Between 2000 and 2019, the owner asked the Water Board for $8 million in reimbursements for UST related cleanup efforts, but the Water Board only authorized approximately $1.5 million.

c) New Findings & Risks

In 2022, GeoCon performed a Phase I Environmental Site Assessment (ESA) for Gateway Development Company, a potential developer of the site. Their penetrating radar and electromagnetic surveys revealed buried debris in the northeastern portion of the site and identified an unregistered underground storage tank (UST) beneath Chinatown Alley, south of 320 Alhambra Blvd. This UST—estimated to be 1,500 to 2,000 gallons—contained six inches of No. 3 or No. 4 fuel oil. Given the long history of commercial and industrial activity, GeoCon reported that spills of petroleum products and hazardous substances may have occurred and recommended a full geotechnical investigation before any site development.

d) Critical Oversight & Needed Action

GeoCon said a developer should recognize that a Phase I ESA is not a comprehensive site characterization and should not be construed as such. A developer should understand that they did not assess the Site for wetlands, asbestos-containing building materials, lead-containing paint, lead in drinking water, radon, mercury related to mining activities, methane, mold, per- and polyfluoroalkyl substances, or potential naturally occurring hazards such as asbestos and arsenic as part of this Phase I ESA.

Also, GeoCon was unable to access the residences on the western portion of the Site, a gated area in the northwestern portion of the 324 Alhambra Boulevard building, or a second-floor room in the central portion of the building, thus data gaps exist for this Phase I ESA. They did not access these areas due to safety concerns. They also found an inactive hydraulic elevator in the northern portion of the basement. Older hydraulic fluids may contain PCBs, which are linked to serious health effects. The Gateway Development Company opted not to pursue the possibility of developing a project at this site.

According to the proposed site plans, new stormwater runoff drains will be routed through Chinatown Alley and connected to the existing 8-inch combined sewer line on Alhambra Blvd. Given that the two underground storage tanks (2000 gallon and 550 gallon) appear to be located along that path, wouldn't their removal be necessary? The map on page 36 of Appendix D identifies the locations of both USTs in the Chinatown Alley—one abandoned (550 gallon) and one unregistered (2,000 gallon).

In California, all single-walled underground storage tanks (USTs) and piping must be removed by December 31, 2025. It would seem that the current property owner would need to obtain the necessary permits to ensure compliance with this deadline. Given the suspected contamination of the unregistered UST, wouldn't its removal and the associated contamination assessment need to be completed before the project is presented to the Planning Commission for approval?

Before the project advances to the Sacramento Planning Commission, further study should be conducted to fully assess the remaining environmental hazards. It should be determined that the site is safe for development before any construction begins. The residents of Casa Loma Terrace deserve transparency, and they should receive a complete report detailing any hazardous conditions in their neighborhood before any development is approved.

7) Summary

The proposed project's initial study report contains numerous issues that would cause this project to have a significant negative environmental impact on the neighborhood – excessive size and density, design character flaws, traffic and transportation issues, inadequate conveyance of sewage, lack of greenspace, and existing hazardous waste concerns.

The owner of this property has spent many years attempting to remediate hazardous contamination from the proposed development site. The entire city block has remained an eyesore for over 15 years, a blighted space that had inadvertently become a gathering site for unhoused individuals. And yet in 2022, when an unregistered potentially leaking underground storage tank (UST) was discovered, nothing was done.

Health, safety, and overall quality of life in this neighborhood will be severely impacted by this oversized development. Residents deserve a thoughtful, sustainable approach to urban planning, not a rushed project that prioritizes developers over the well-being of the community.

While the need for affordable housing is undeniable, soaring home prices have driven developers to rapidly construct high-density apartment complexes, charging rents equivalent to a mortgage payment, a model driven by greed and the city's fiscal instability, rather than genuine housing solutions.

For these reasons, I urge the City of Sacramento to reconsider the current proposal and prioritize a development that better aligns with the community's needs and established codes and regulations.

Sincerely,

Ann Broderick
ann.broderick@gmail.com
East Sacramento Resident

Zachary Dahla

From: Andrew Gates <amcalgates@gmail.com>
Sent: Wednesday, February 11, 2026 11:25 AM
To: Planning; Ron Bess; Zachary Dahla
Subject: P24-007 - IS/MND - Comments

Follow Up Flag: Follow up
Flag Status: Flagged

Dear City of Sacramento, Mr. Bess, and Mr. Dahla,

It's been brought to my attention that the Planning Department has opted to not include in their final report comments and letters received in response to the Initial Study/Mitigated Negative Declaration in May 2025 for P24-007 the "Alhambra Redevelopment Project". As such I am submitting to you below a slightly altered version of the comments I submitted to Mr. Bess on May 7, 2025. Please include these in the final report:

I live four houses east of the proposed development specified in P24-007, and I am submitting below my comments and concerns regarding the IS/MND document that was dispersed last year:

McKinley Park

Page 99 XVI. Recreation states:

> The proposed project is located within 0.5-mile of Leland Stanford Park, Sutter's Landing Regional Park, Michael Himovitz Park, Russ Solomon Park, R. Burnett Miller Park, and McKinley Park.
>
> Based on the above, the proposed project would not result in an increased use of existing recreational facilities, nor would the proposed project include or require construction or expansion of recreational facilities which might have an adverse physical effect on the environment. Thus, a less-than-significant impact would occur.

This needs to be re-evaluated. I fear that the author of this snippet is either not aware of the discrepancies between the parks listed, or is simply arguing in bad faith.

McKinley Park should be the main focus when we discuss the impact of this project for multiple reasons:

Michael Himovitz Park, Russ Solomon Park, and R. Burnett Miller Park are all tiny parks tucked away in McKinley Village, which is not readily accessible by foot from the proposed development. They do little to nothing to dampen the impact on our local parks.

Sutter's Landing and Leland Stanford Park are both fine parks, but they do not hold a candle to McKinley Park - and this is reflected in their popularity.

Most importantly, this new development is a block from McKinley Park. No one living in this new

development is going to the other parks listed at even a fraction of the regularity. McKinley Park is not currently equipped to deal with this influx of population.

As a resident who visits McKinley Park multiple times a week, here is the current state of the park:

• The only way to get a lane at Clunie pool in the summer after working hours is to make sure you're there at or before 4:30pm, at which point you are often getting the last free lane. Any time after that, all the lanes are full.

• Same applies to the tennis courts, weather permitting.

• The playground is almost always at capacity during peak hours.

• McKinley Park has a single basketball court, which is almost always in use.

• On weekends the newly built barbecue area is almost always at capacity.

This project is adding 870 people a block away from a park that is already bordering on under-provisioned.

This is a massive negative externality for residents of this and surrounding neighborhoods which needs to be accounted for. The document says:

> Thus, the proposed project would be subject to compliance with SCC section 18.56.220, which requires the applicant to pay a park impact fee. The park impact fee is imposed on the development of new dwelling units, non-residential development including additions to a building or structure, and the change in use of a building or structure on any parcel, and thus, would apply to the proposed project. In addition, the proposed project would include payment of fees consistent with SCC section 17.512.040 in lieu of dedicating parkland as part of the proposed development. Payment of all applicable fees would be considered sufficient to ensure that that adequate parkland be provided within the City, and a less-than-significant impact would occur.

Having this developer pay an unspecified sum to the city does not come close to addressing the negative impact this will have on the neighborhood.

I'd advocate strongly for specific, concrete plans from the developer and the city as to how they will address these impacts.

I would also advocate that improvements to the park be required to be completed as part of the development's milestones. The developer of this project doesn't live on this block and needs to have skin in the game. They cannot be allowed to introduce negative externalities without recompense. They will be making large amounts of money off this project, and some of that money needs to flow back into the community to mitigate the impacts they're having on the lives of the people in the neighborhood.

Cancer Risks:

Table 6, titled "Maximum Unmitigated Cancer Risk and Hazard Index" on page 41 (page 44 of the PDF)

states that the cancer risk exceeds thresholds of significance. On the next page mitigation is discussed. Will these risks be mitigated, as discussed? My concern is that in the pursuit of new housing the city and state are being too lax regarding public health and safety.

My wife and I just welcomed our first child into the world 14 months ago - and are hoping another is on the way. We would request that the city protect our children in any way they can.

Thank you for your time and service to the city I love.

Andrew Gates
3135 D St
Sacramento, CA 95816

Zachary Dahla

From: Beverly Tobey <bevannt3@gmail.com>
Sent: Wednesday, February 11, 2026 12:30 PM
To: Zachary Dahla
Cc: Karlo Felix
Subject: Project 2025-01286. P24-007

Follow Up Flag: Follow up
Flag Status: Flagged

I have owned my home in East Sac for 55 years. As a homeowner I am appalled by this oversized project in close proximity to housing and McKinley Park.
Yes, there is high demand to live in East Sac. In part, this is because it is NOT composed of this type of oversized building and housing.
This six story project is utterly at odds with the character of our neighborhood. Among other things, It requires waiving CEQA restrictions, current height restrictions, Alhambra District requirements, as well as removal of seven trees.
Surely there is a use for this infill area which is more compatible with East Sacramento's character.

Sent from my iPad

Zachary Dahla

From: cbdesign@surewest.net
Sent: Tuesday, February 10, 2026 12:31 PM
To: Zachary Dahla
Subject: P24-007 'Alhambra Redevelopment'
Attachments: Flood - sewer Santa Ynez - 4.jpg; Flood - 35th Street -1.jpg; Flood - Santa Ynez -5.jpg; Flood - sewer Santa Ynez - 3.jpg; Flood - sewer Santa Ynez -2.jpg; Flood - sewer Santa Ynez.jpg

Follow Up Flag: Follow up
Flag Status: Flagged

To: Zach Dahla
RE: P24-007

I am a resident of McKinley Park.

1) The proposed project referenced above is requires an amendment to the city's general plan and specifically the Alhambra special planning district.

Please don't give a special/conditional use permit for this project. Some kind of housing can be built to fit within these parameters.

2) This proposed project is *vastly out of scale* to surrounding homes which are single story and approx. 1000 sq. ft. or less in size.

It is also *vastly out of character* to surrounding turn of the century, vintage bungalows in Casa Loma Terrace. Please be sensitive to the surrounding neighbor's homes.

3) While we need housing, many more options could satisfy that need with a two-story structure or building of individual town homes much like the ones found two blocks away

on Alhambra Blvd. Please build something that has integrity and adds to rather than detracts to our neighborhood.

4) See pictures attached: Adding hundreds of toilets to this area's frail sewer system will impact everyone around this area.

Adding the "vault" under McKinley Park – while it helped – it did not solve the flooding issue upon heavy or sustained rains. The antiquated, combined sewer system found in this area impacts surrounding property and homes when it overflows with raw sewage onto our streets, yards and park. While flooding occurred shortly after the vault was completed, flooding occurred. When asking a maintenance worker - who was nearby adding caution blocks to the flooded street - to "*open the new vault"* when the rain water rose, he exclaimed "*the vault is already open"*.
This is and continues to be a problem in our area of McKinley Park as the city does not have the resources to split the sewer system.
Please don't add to that impact.

Claudia Campbell

Zachary Dahla

From: corahowe@comcast.net
Sent: Wednesday, February 11, 2026 1:08 PM
To: Zachary Dahla; rkutect@gmail.com; District 4; Mayor
Subject: Concerns about Redevelopment Project P24-007

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Gentlemen,

I am writing to let you know that I have concerns about the development of the project at 30th and Alhambra.
I am not apposed to development at that corner. In fact, it needs to be developed as we need more housing but please cut the proposal to a size that blends with the rest of our East Sac community.
By doing this you lessen the impact on the roads, traffic, and all infrastructure.
You should also be asking the developer to contribute to the upgrading to the infrastructure that any improvements would have to the area.
At the current proposed height it would be an eyesore to the area.
Action request: I would ask that you tell the developer to rethink the size of this particular building and present a new proposal that the whole community can get behind.

Thanks for listening to the community that put you in office.
Cora Howe
98 46th St.

Zachary Dahla

From: ellen jean powell <ellenjpowell2@gmail.com>
Sent: Wednesday, February 11, 2026 1:13 PM
To: rkutect@gmail.com
Cc: Zachary Dahla; District 4; Mayor
Subject: Mary Anns Bakery project

Follow Up Flag: Follow up
Flag Status: Flagged

I write to urge you to scale back the proposed project at the old Mary Anns Bakery site in East Sacramento. I believe the height and size of this project are inconsistent with the surrounding residential neighborhood. It would be detrimental to neighborhood traffic, public safety and infrastructure capacity. Also, as the units are entirely market rate the project does nothing to alleviate the city need for affordable housing.

I would support a scaled back housing project more in keeping with the surrounding neighborhood but believe as proposed this project exacerbates existing traffic and infrastructure problems and provides no benefit to the public. Approval in its current form would set a dangerous precedent for overruling protections of residential neighborhoods in the interests of developers eager to wring the maximum profit from their property.

In short, its just too big!

Zachary Dahla

From: martin bailey <mbailey144383@gmail.com>
Sent: Wednesday, February 11, 2026 2:06 PM
To: District 4; Mayor; rkutect@gmail.com; Zachary Dahla
Subject: 6 Story Alhambra Corridor Development

Follow Up Flag: Follow up
Flag Status: Flagged

I oppose the planned construction of the 6 story mixed use project. Our neighborhood is already suffering from traffic congestion and aging infrastructure. Enforce the 35ft height limit, preserve our neighborhood. Listen to the people who live here. Do not use State housing directives as an excuse.

Martin Bailey
580 38th st
Sacramento

Zachary Dahla

From: Maggie Stewart <maggiestewart888@gmail.com>
Sent: Tuesday, February 10, 2026 12:33 PM
To: Zachary Dahla
Subject: P24-007

Follow Up Flag: Follow up
Flag Status: Flagged

The proposed development for my neighborhood at the Maryanne Bakery site is much too large. Please do not approve until the Alhambra buffer zone limit of 35 feet is restored. Why hasn't any low income housing been included? We are close to CSU and many medical offices with low wage workers. Please explain.

Maggie Stewart
239 San Miguel Way

Zachary Dahla

From: PJ <pj.balsley@gmail.com>
Sent: Wednesday, February 11, 2026 12:45 PM
To: Zachary Dahla; District 4; Mayor; rkutect@gmail.com
Subject: 6-Story Alhambra Corridor Proposal P24-007

Follow Up Flag: Follow up
Flag Status: Flagged

I've been hearing about and reading up on this project P24-007, which is placing a huge housing development along Alhambra St in East Sacramento.

I'm not happy with how large this project is within such a small space. I'm all for housing. I'm not for cramming more in a neighborhood that has sewer issues. The city has already installed the poop Vault in Mckinley park to 'help', but doesn't fix the actual problem.

This building is way to tall. Add hundreds more people, cars, and traffic wedged in a corner of the neighborhood. It looks more like a prison then anything else.

Can we cut off the top 3-4 stories?

Please don't allow this in just to 'get more taxes', which I swear is all the city cares about.

I'm not a NIMBY. I'm more about not forcing a square peg in a round hole. This development needs to be far more realistic to the location and load on the services.

pj balsley

Zachary Dahla

From: Randy Arai <randyarai@gmail.com>
Sent: Wednesday, February 11, 2026 11:53 AM
To: Zachary Dahla
Subject: Alhambra Corridor Redevelopment Prject, P24-007

Follow Up Flag: Follow up
Flag Status: Flagged

I am a resident of East Sacramento and my wife and I have been informed of the above project planned in our neighborhood. I am writing to inform you of our strongest objection to the building of this property in our area. Besides breaking the legal code for heights of newly constructed buildings in our area, the added traffic and congestion will only complicate an already taxed infrastructure in our neighborhood. Again, we and many others in our area are greatly opposed to this plan and would ask that you listen to us who live in this beautiful area. Thank you for your kind consideration of this matter.

Respectfully yours:

Randy C. Arai M.D.

Zachary Dahla

From: R hatton <r.hatton@live.com>
Sent: Wednesday, February 11, 2026 12:33 PM
To: Zachary Dahla
Subject: P24-007---ALHAMBRA REDEVELOPEMENT PROJECT

Follow Up Flag: Follow up
Flag Status: Flagged

P24-007 ALHAMBRA REDEVELOPEMENT PROJECT:

Adding a 6 story, 332+ unit to our Alhambra/East Sac neighborhood is ludicrous!

Despite all of the logistic that would be the result of such construction, having lived in the area for over 40 years I've enjoyed the family friendly atmosphere that our closeness that our homes provide and KNOW that the characteristics of 'apartment' living is totally different, less connected, less interactive.

"Alhambra Corridor Special Planning District was designed to protect East Sacramento's historic neighborhoods by **limiting development near homes to a 35-foot height maximum**. This long-standing buffer zone preserves neighborhood character and prevents large, incompatible structures from overwhelming one- and two-story family homes."

Please consider the human side of your proposal instead of the $$$$ bottom line so evident in your plans. There surely is a way to grow/progress without harming our city, our air, our trees, our family neighbors.

Pleading, nay demanding that you vote against this project.

Rosel Hatton

Zachary Dahla

From: Richard Kitowski <rkitowski@surewest.net>
Sent: Wednesday, February 11, 2026 4:39 PM
To: Zachary Dahla
Cc: rkutect@gmail.com; Mayor
Subject: apartment project proposed at Alhambra and D St.

Hello,

My wife and I are residents of East Sacramento and live at 593 36th St. We are strongly opposed to the massive 6 story project planned for the block at Alhambra Blvd and D and C St.s. The project is way out of scale and proportion to the adjacent neighborhood which is primarily single level residential homes.

I am requesting that you vote NO on this project as it has been submitted. When you look at the rendering there is approx. a 63 foot shear wall along D st. and Alhambra Blvd. This project needs to be downsized and the architecture should have steps back from the sidewalks on the streets that surround it. The design can only be described at a massive block of masonry material.

Please be a responsible planner and vote NO on this project in its current form

Thank You,
Richard Kitowski
593 36th St. Sacramento

Zachary Dahla

From: Rose Luther <ra.luther@yahoo.com>
Sent: Sunday, February 8, 2026 7:03 PM
To: Mayor; District 1; District 2; District 3; District 4; District 5; Eric Guerra; Rick Jennings; District 8; pdc.eyeung@gmail.com; Zachary Dahla
Subject: Redevelopment Project, P24-007

Subject: Redevelopment Project, P24-007

Please scale this project down to a manageable **3-stories** for the north end of Alhambra Boulevard. The proposed 6-story, 332 units, is **not on a public transit corridor** or on a major open street. There is **sparse bus service** to the area. Use a commonsense view that Sacramento is designed as car-centric; routine trips for work and daily necessities in most directions are reliant on a personal vehicle. There is already frequent substantial traffic backup in the area, with no foreseeable mitigation for increased commuting. **Three stories of apartment units will increase housing**, with less intense impact on traffic and parking overload.

A 6-story structure is also not compatible with respect to homes on C, D streets and Alhambra Blvd. This residential area has been prized as part of a historically desirable Sacramento neighborhood. Please value neighborhood character and **approve building 3-stories of apartment units** rather than a colossal 6 stories in an area with restricted access to public transportation.

Thank you,
Rose Luther,
East Sacramento resident

Zachary Dahla

From: Bruce Graves <brucefgraves@gmail.com>
Sent: Wednesday, February 11, 2026 3:48 PM
To: District 4
Cc: Zachary Dahla
Subject: Alhambra Corridor Project, P24-007

Several months ago my wife and I attended an information meeting sponsored by the neighborhood preservation group. It was well attended. It was pretty clear from the architect's presentation that this proposal is massive, one that will dump more traffic on busy streets and freeway access to business 80 east. Several of those present expressed the sentiment that, while they favored some housing infill, the project is way too large for the neighborhood. And this is a project that blows by the 35 foot limit as noted in the Special Planning District limits. And if I heard correctly, the units are market rate, so no concession to the need for affordable housing. Should this monstrosity get past the planners and actually get built, I pity the neighbors.

I have expressed this opinion to your office, Councilman Pluckebaum. Many others have as well. The response I got after I wrote a second time was to wait for the planning commission meeting. Okay, so we'll wait to see what occurs. If this project passes muster as is, I expect you'll a see quite a backlash. I was struck by comments I heard at a recent meeting about the SCUSD property on upper Jay Street, whose fate will undoubtedly animate people who live in that neighborhood. Those comments were posed as a question. "Where is our city country person? Why doesn't he show up at these meetings?" Perhaps you see this differently, but we are hearing this a lot.

Sincerely,

Bruce Graves
834 36th Street Sac CA 95816

Zachary Dahla

From: Laura Barnes <jeannelaur@gmail.com>
Sent: Wednesday, February 11, 2026 3:35 PM
To: Zachary Dahla
Subject: I Oppose the 6-Story Alhambra Corridor Project

This is a terrible project. I am a long-term resident of East Sacramento and formerly lived on C and 31st Street. I have directly experienced the terrible traffic in this area. This project will turn every visit in and around McKinley Park into a worse nightmare. It is very dangerous and irresponsible.

Laura Barnes
(916) 616-8943

Zachary Dahla

From: Ronnie Ormsby <sonic71789@gmail.com>
Sent: Wednesday, February 11, 2026 1:26 PM
To: Mayor; District 4; rkutect@gmail.com; Zachary Dahla
Subject: In Support of the Alhambra Corridor Redevelopment Project

Follow Up Flag: Follow up
Flag Status: Flagged

To those representing the people:

The quieter majority knows growth is necessary for a city and state to thrive. I received a letter from "Save East Sac!" opposing new housing in my neighborhood, a message diametrically opposed to what I believe our state and city needs.

Please remember that **the vast majority of people believe increasing California's housing stock is the state's and local communities' highest priority.**

Sincerely,
Ronald Ormsby
River Park Homeowner

Zachary Dahla

From: jo conger <joconger@gmail.com>
Sent: Wednesday, February 11, 2026 2:29 PM
To: Mayor; District 4; rkutect@gmail.com; Zachary Dahla
Subject: Alhambra Corridor Redevelopment

Follow Up Flag: Follow up
Flag Status: Flagged

I will be unable to attend the Planning Commission meeting on February 12th. But as a resident of East Sacramento I wanted to express my **approval** of the multi unit building proposed between 30th street and Alhambra Blvd, and C and D streets. There is a dire need for more housing in this area as well as options for people who would like to enjoy the attributes of living in East Sacramento but can not afford a $700,000 + home, like my adult children, for example. This type of housing is also attractive for those of us who at some point may no longer be able to maintain a single family home, but would like to remain in the area .

Do not let the negative Nancys sway the decision, just because one is a resident does not mean they own the surrounding area, or the future of who may have the opportunity to live within its bounds.

Thank you,

Jo Conger
916-296-5165

Subject: Public Comment – Alhambra Boulevard Redevelopment Project
Submitted by Residents' Rights and Responsibilities

Re: Environmental, Biological, and Public Health Assessments Related to EMF, Electrical Exposure, and Wireless Infrastructure

Thank you for the opportunity of Residents Rights and Responsibilities to comment on the Alhambra Boulevard Redevelopment Project (P24-007). This submission raises critical questions and requests clarification on the environmental and public health effects of the proposed development—specifically related to non-ionizing electromagnetic field (EMF) exposures from both wireless (radiofrequency/ microwave) and electrical (power frequency) sources, as well as this radiations effects on children, pollinators and wildlife.

I. Wireless Radiation / Radiofrequency (RF) EMF Exposure

Cell towers, including 4g and 5G cellular antennas emit radio frequency (RF) radiation, a type of non-ionizing electromagnetic radiation. Although this type of radiation is non-ionizing, this does not ensure safety as biological effects are reported in numerous peer-reviewed studies, including oxidative stress, DNA damage, cancer as well as reproductive and neurological effects.[1,2,3,4,5,6,7] As an example, a 2022 review examined existing research on people living near mobile phone

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[1] Lin, J. C. (2023). Incongruities in recently revised radiofrequency exposure guidelines and standards. *Environmental Research*, *222*, 115369.

Scarato, T. (2025). *U.S. policy on wireless technologies and public health protection: Regulatory gaps and proposed reforms*. Frontiers in Public Health, 13, Article 1677583. https://doi.org/10.3389/fpubh.2025.1677583

[2] Lopez I, Rivera M, Feliz N, Maestu C. (2022) It is mandatory to review environmental radiofrequency electromagnetic field measurement protocols and exposure regulations: An opinion article. Front. Public Health, 24 October

[3] Hardell, L., & Sage, C. (2008). Biological effects from electromagnetic field exposure and public exposure standards. *Biomedicine & Pharmacotherapy = Biomedecine & Pharmacotherapie*, *62*(2), 104–109.

[4] Lai, H., & Levitt, B. B. (2022). The roles of intensity, exposure duration, and modulation on the biological effects of radiofrequency radiation and exposure guidelines. *Electromagnetic Biology and Medicine*, *41*(2), 230–255.

[5] Panagopoulos DJ. Mobile telephony radiation exerts genotoxic action and significantly enhances the effects of gamma radiation in human cells. Gen Physiol Biophys. 2024 Mar;43(2):103-120. doi: 10.4149/gpb_2023036. Epub 2023 Dec 8. PMID: 38099580.

[6] Assefa EM and Abdu SM (2025) Histopathologic effects of mobile phone radiation exposure on the testes and sperm parameters: a systematic literature review of animal studies. Front. Reprod. Health 6:1515166. doi: 10.3389/frph.2024.1515166

[7] Hu, C., Zuo, H., & Li, Y. (2021). Effects of Radiofrequency Electromagnetic Radiation on Neurotransmitters in the Brain. *Frontiers in Public Health*, *9*.

base stations and found the majority of studies reported impacts, primarily radiofrequency sickness, cancer, and altered biochemical markers.

In July 2021, the European Parliament released a commissioned report titled "Health Impact of 5G," which concluded that widely used RF radiation frequencies (450–6000 MHz) are likely carcinogenic to humans and may harm male fertility and early development stages such as embryos and newborns.[8]

In 2011, RF radiation was classified as a Group 2B "possible carcinogen" by the World Health Organization's International Agency for Research on Cancer (WHO/IARC).. Since then, peer-reviewed studies on both people and animals have reported increased cancer risks. The 2018 large scale animal study published in *Environmental Research* by Falcioni et al. found elevated cancer rates in rats exposed to RF radiation at levels *permitted for cell tower emissions.*[9] Scientists involved in the original IARC evaluation have since stated that, based on current evidence, RF radiation would likely be reclassified as a probable or even proven human carcinogen if reassessed today.[10, 11,12,13,14,15]

1. There needs to be an analysis of radiofrequency (RF) EMF exposure from anticipated wireless infrastructure (e.g., cell towers, rooftop antennas, in-unit Wi-Fi systems) to accommodate the new residents.

---

[8] Directorate-General for Parliamentary Research Services (European Parliament), & Belpoggi, F. (2021). Health impact of 5G: Current state of knowledge of 5G related carcinogenic and reproductive/developmental hazards as they emerge from epidemiological studies and in vivo experimental studies. Publications Office of the European Union.

[9] Falcioni, L., Bua, L., Tibaldi, E., Lauriola, M., De Angelis, L., Gnudi, F., Mandrioli, D., Manservigi, M., Manservisi, F., Manzoli, I., Menghetti, I., Montella, R., Panzacchi, S., Sgargi, D., Strollo, V., Vornoli, A., & Belpoggi, F. (2018). Report of final results regarding brain and heart tumors in Sprague-Dawley rats exposed from prenatal life until natural death to mobile phone radiofrequency field representative of a 1.8 GHz GSM base station environmental emission. *Environmental Research*, *165*, 496–503.

[10] Carlberg, M., & Hardell, L. (2017). Evaluation of Mobile Phone and Cordless Phone Use and Glioma Risk Using the Bradford Hill Viewpoints from 1965 on Association or Causation. *BioMed Research International*, *2017*, 9218486.

[11] Miller, A. B., Sears, M. E., Morgan, L. L., Davis, D. L., Hardell, L., Oremus, M., & Soskolne, C. L. (2019). Risks to Health and Well-Being From Radio-Frequency Radiation Emitted by Cell Phones and Other Wireless Devices. *Frontiers in Public Health*, *7*.

[12] James C. Lin. (2022) Carcinogenesis from chronic exposure to radio-frequency radiation. Front. Public Health, Sec. Radiation and Health. 31 October

[13] Miller, A. B., Morgan, L. L., Udasin, I., & Davis, D. L. (2018). Cancer epidemiology update, following the 2011 IARC evaluation of radiofrequency electromagnetic fields (Monograph 102). *Environmental Research*, *167*, 673–683.

[14] Peleg M, Berry EM, Deitch M, Nativ O, Richter E.(2022) On radar and radio exposure and cancer in the military setting. Environ Res. 2022 Oct 21:114610

[15] Hardell, L., & Carlberg, M. (2019). Comments on the US National Toxicology Program technical reports on toxicology and carcinogenesis study in rats exposed to whole-body radiofrequency radiation at 900 MHz and in mice exposed to whole-body radiofrequency radiation at 1,900 MHz. *International Journal of Oncology*, *54*(1), 111–127.

2. Will the development include the installation of a new cell tower or cell antennas mounted on the rooftops, nearby rooftops or utility poles? If so, what modulations and frequencies will be used (e.g., 5G at 24–39 GHz or higher)?
3. Can the current networks accommodate the new residents? Was this evaluation performed to understand if new base station antennas will need to be added?
4. Has cumulative RF exposure modeling been done to account for the increase in indoor and outdoor levels of RF from the additional infrastructure needed to accommodate the residents?
5. How will residents be connected to the internet? Will it be fiberoptic or will residents be connecting with Wi-Fi routers. Will fixed wireless be an option? Have any mitigation strategies been proposed for the wireless radiation exposure, such as wired internet infrastructure throughout the building, RF shielding, or router cutoff timers?
6. Are there plans to notify residents about proximity to antennas, wireless emissions, or any FCC-licensed equipment installed on-site?
7. Will any parts of the project be designated as low-EMF or RF- reduced spaces for sensitive individuals, especially children or people with electro hypersensitivity?
8. Has the City consulted independent research showing biological harm to humans from chronic RF exposure at legally permissible levels?
9. Can the roof be leased for RF-transmitting antennas? If so, what will the review process be for that? Or can deployments go through without public review?Will residents and community members be informed?
10. Will smart meters be on or in the building? Will it be one for the entire building or will each residence have a smart meter? Will they be in a bank along a wall and will residents have bedrooms backing up the bank of meters? If so, will they be informed about the health issues linked to smart meters as they emit RF?
11. Will residents be allowed to opt out or use shielded analog alternatives?
12. What accommodations are in place for people with electromagnetic hypersensitivity who will be harmed by increased exposures or for people who develop illness from the exposures?[16]

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[16] Hardell, L., & Nilsson, M. (2023). Case Report: The Microwave Syndrome after Installation of 5G Emphasizes the Need for Protection from Radiofrequency Radiation. *Annals of Case Reports*.
Hardell, L., & Koppel, T. (2022). Electromagnetic hypersensitivity close to mobile phone base stations – a case study in Stockholm, Sweden. *Reviews on Environmental Health*.
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Note: Compliance with FCC limits does not ensure safety and cannot be relied on. The FCC has not complied with a 2021 federal court order[17] requiring it to justify how its outdated 1996 wireless radiation limits remain protective. The court found the FCC's decision not to update the limits "arbitrary and capricious," lacking scientific evidence, and ignoring key issues like children's health, long-term exposure, and environmental impacts. The FCC's failure to respond means its limits remain unsupported by current science. Thus, these limits cannot be relied on to ensure safety to residents and the surrounding community.

II. Electrical EMF Exposure (Low-Frequency / Power Lines, Wiring)

Repeated studies over decades have shown an association between residential exposure to extremely low frequency electromagnetic fields (ELF-EMFs), such as those from power lines, internal wiring, and electrical appliances, and an increased risk of childhood leukemia[18,19,20,21] and other health impacts, including synergistic impacts when combined with other toxins.[22,23,24, 25, 26] The International Agency for Research on Cancer classified ELF-EMFs as a "possible" human carcinogen in 2001 based on studies showing a two-fold increased risk of leukemia at exposures

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[17] Environmental Health Trust v. FCC, 9 F.4th 893, 898–99 (D.C. Cir. 2021).https://www.fcc.gov/document/dc-circuit-decision-environmental-health-trust-v-fcc

[18] Sun, J. W., Li, X. R., Gao, H. Y., Yin, J. Y., Qin, Q., Nie, S. F., & Wei, S. (2013). Electromagnetic field exposure and male breast cancer risk: a meta-analysis of 18 studies. *Asian Pacific journal of cancer prevention : APJCP*, *14*(1), 523–528.

[19] Brabant, C., Geerinck, A., Beaudart, C., Tirelli, E., Geuzaine, C., & Bruyère, O. (2022). Exposure to magnetic fields and childhood leukemia: A systematic review and meta-analysis of case-control and cohort studies. *Reviews on Environmental Health*.

[20] Brabant C, Honvo G, Demonceau C, Tirelli E, Léonard F, Bruyère O. Effects of extremely low frequency magnetic fields on animal cancer and DNA damage: a systematic review and meta-analysis. Prog Biophys Mol Biol. 2024 Dec 31:S0079-6107(24)00116-0. doi: 10.1016/j.pbiomolbio.2024.12.005.

[21] Seomun, G., Lee, J., & Park, J. (2021). Exposure to extremely low-frequency magnetic fields and childhood cancer: A systematic review and meta-analysis. *PLOS ONE*, *16*(5), e0251628.

[22] Khan, M. W., Juutilainen, J., Naarala, J., & Roivainen, P. (2022). Residential extremely low frequency magnetic fields and skin cancer. Occupational and Environmental Medicine, 79(1), 49–54.

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over 3–4 milligauss.[27] Many countries—including France, Germany, and Switzerland—enforce strict limits in sensitive areas.

1. Has an evaluation been conducted on residential EMF exposure expected from electrical wiring, power lines and the electrical lines providing power to the building?
2. Will shielded or twisted-pair wiring be used in the construction to reduce 50/60 Hz electric and magnetic fields in living spaces?
3. Are large utility transformers, service panels, or charging stations located adjacent to residential walls or bedrooms?
4. Will high-EMF equipment be placed in utility closets shared between multiple residential units?
5. Has the design addressed nighttime EMF exposure, particularly in bedrooms?
6. Will systems be engineered to minimize stray current and magnetic fields across the building footprint?

III. Impacts on Children and Vulnerable Populations

The American Academy of Pediatrics states that children are uniquely sensitive to EMFs due to their still developing brains, thinner skulls, and higher tissue conductivity.[28] Scientific modeling has shown that wireless radiation penetrates deeper and more intensely into children's brains compared to adults.[29,30] Their rapidly developing brains are more sensitive and numerous medical associations recommend reducing exposure.[31,32]

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[27] IARC. (n.d.). *Non-ionizing Radiation, Part 1: Static and Extremely Low-frequency (ELF) Electric and Magnetic Fields*. Retrieved September 21, 2022, from https://publications.iarc.fr/Book-And-Report-Series/Iarc-Monographs-On-The-Identification-Of-Carcinogenic-Hazards-To-Humans/Non-ionizing-Radiation-Part-1-Static-And-Extremely-Low-frequency-ELF-Electric-And-Magnetic-Fields-2002

[28] Davis, D., Birnbaum, L., Ben-Ishai, P., Taylor, H., Sears, M., Butler, T., & Scarato, T. (2023). Wireless technologies, non-ionizing electromagnetic fields and children: Identifying and reducing health risks. *Current Problems in Pediatric and Adolescent Health Care*, *53*(2), 101374.

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[30] Gandhi, O. P., Morgan, L. L., de Salles, A. A., Han, Y.-Y., Herberman, R. B., & Davis, D. L. (2012). Exposure Limits: The underestimation of absorbed cell phone radiation, especially in children. *Electromagnetic Biology and Medicine*, *31*(1), 34–51.

[31] https://ehsciences.org/doctors-and-scientists-on-cell-phone-radiation-health-effects/

[32] Belpomme, D., Hardell, L., Belyaev, I., Burgio, E., & Carpenter, D. O. (2018). Thermal and non-thermal health effects of low intensity non-ionizing radiation: An international perspective. *Environmental Pollution*, *242*, 643–658.

Pregnancy is a time of vulnerability as well and EMF levels, both radiofrequency and ELF and magnetic fields need to be evaluated and mitigated. Studies by Kaiser Permanente linked prenatal ELF-EMF exposure to miscarriage[33], ADHD[34], obesity[35], and asthma.[36]

- What steps will be taken to reduce EMF (both RF and electrical) exposure in units occupied by children, infants, or pregnant people?
- Are any family units or play areas located near smart meters, electrical panels, or rooftop antennas?
- Will parents be given exposure levels and information on EMF safety options (e.g., disabling Wi-Fi at night, hardwiring devices) during move-in or leasing?

IV. Impacts on Pollinators, Wildlife, and Ecosystems

U.S. regulations ignore wildlife as FCCs limits were designed for humans only. Compliance tests measure ground-level RF levels where people exist, ignoring the airspace near antennas where birds fly and trees grow. Studies show RF radiation disrupts bee pollination, bird navigation and reproduction, and can impact plant and tree health.[37,38,39,40] U.S. guidelines are for humans, not wildlife and thus no regulations exist to protect flora or fauna from adverse effects.[41] Regardless, wildlife and plant/tree exposures must be addressed and mitigated to ensure safety.

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[33] Li, D.-K., Chen, H., Ferber, J. R., Odouli, R., & Quesenberry, C. (2017). Exposure to Magnetic Field Non-Ionizing Radiation and the Risk of Miscarriage: A Prospective Cohort Study. Scientific Reports, 7(1), 17541.
Li, D.-K., Odouli, R., Wi, S., Janevic, T., Golditch, I., Bracken, T. D., Senior, R., Rankin, R., & Iriye, R. (2002). A population-based prospective cohort study of personal exposure to magnetic fields during pregnancy and the risk of miscarriage. Epidemiology (Cambridge, Mass.), 13(1), 9–20.

[34] Li, D.-K., Chen, H., Ferber, J. R., Hirst, A. K., & Odouli, R. (2020). Association Between Maternal Exposure to Magnetic Field Nonionizing Radiation During Pregnancy and Risk of Attention-Deficit/Hyperactivity Disorder in Offspring in a Longitudinal Birth Cohort. JAMA Network Open, 3(3), e201417.

[35] Li, D.-K., Ferber, J. R., Odouli, R., & Quesenberry, C. P. (2012). A Prospective Study of In-utero Exposure to Magnetic Fields and the Risk of Childhood Obesity. Scientific Reports, 2(1), 540.

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nonhuman species interact with natural and man-made EMF at ecosystem levels and public policy recommendations. *Frontiers in Public Health*

[38] Levitt, B. B., Lai, H. C., & Manville, A. M. (2021b). Effects of non-ionizing electromagnetic fields on flora and fauna, Part 2 impacts: How species interact with natural and man-made EMF. Reviews on Environmental Health, 37(3), 327–406.

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[40] Panda DK, Das DP, Behera SK, Dhal NK. Review on the impact of cell phone radiation effects on green plants. Environ Monit Assess. 2024 May 21;196(6):565

[41] Levitt BB, Lai HC and Manville AM II (2022) Low-level EMF effects on wildlife and plants: What research tells us about an ecosystem approach. Front. Public Health 10:1000840. doi: 10.3389/fpubh.2022.1000840

1. Has the City considered the scientifically documented impacts of RF radiation on pollinators (e.g., bees, butterflies, birds), which may be drawn to landscaped areas but harmed by wireless exposures from base station antennas?
2. Has the City evaluated studies showing increased RF absorption in small organisms at 5G and millimeter-wave frequencies? The US did not perform premarket safety testing for new frequency bands, including millimeter-wave and sub-terahertz technologies, despite research indicating insects are uniquely vulnerable.[42,43]
3. What protections or buffer zones are being planned to preserve pollinator viability near this development if there are increased levels of wireless and other non-ionizing radiation?

V. Infrastructure Transparency and Planning

- Has the City coordinated with broadband and utility companies to ensure full transparency around new or upgraded transmission infrastructure (cell, fiber, smart grid)?
- Will residents have access to accurate data on ambient RF and EMF levels in their units or common areas?
- Will there be any post-construction EMF auditing to monitor EMF exposure?

VI. Energy Consumption

Wired technology uses less energy as compared to wireless technology and studies have shown that wireless networks can use up to 10 times more energy than wired ones at equivalent data rates, making wired connections the more sustainable and energy-efficient choice for meeting

[42] Jeladze V, Nozadze T, Partsvania B, Thielens A, Shoshiashvili L, Gogoladze T. Numerical dosimetry of specific absorption rate of insects exposed to far-field radiofrequency electromagnetic fields. Int J Radiat Biol. 2025 Jan 2:1-14. doi: 10.1080/09553002.2024.2442693.

[43] Thielens, A., Bell, D., Mortimore, D. B., Greco, M. K., Martens, L., & Joseph, W. (2018). Exposure of Insects to Radio-Frequency Electromagnetic Fields from 2 to 120 GHz. Scientific Reports, 8(1), 3924.

modern digital demands.[44,45,46,47,48,49,50, 51] Wired networks are significantly more energy-efficient than wireless systems due to their lower power requirements, more efficient infrastructure sharing, and superior scalability. As data demand increases, wired technologies—especially fiber—scale with minimal additional energy use, while wireless networks require more base stations and antennas, sharply increasing energy consumption per user.

- Has a comparative analysis been conducted on the total energy consumption of wired versus wireless technology in the building's IT and communications infrastructure?If yes, what are the results in terms of annual kilowatt-hour savings?
- Has the energy use associated with wireless infrastructure components (e.g., routers, repeaters, access points) been modeled and compared to that of a wired Ethernet system (e.g., switches, cabling)?
- Does the EIS quantify energy savings that could result from prioritizing wired connections over wireless in high-use areas like offices, classrooms, or labs?
- Has the lifecycle energy footprint (including manufacture, operation, and end-of-life disposal) of wired and wireless networking components been considered?
- Were power consumption metrics from real-world deployments or industry benchmarks used to inform technology selection?
- Is there an analysis of how prioritizing wired technology may reduce the cooling load or HVAC energy consumption, especially in equipment-dense areas?
- Has the energy consumption impact of prioritizing wired connections in the building been evaluated?

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[44] J. Baliga, R. Ayre, K. Hinton and R. S. Tucker, "Energy consumption in wired and wireless access networks," in *IEEE Communications Magazine*, vol. 49, no. 6, pp. 70-77, June 2011, doi: 10.1109/MCOM.2011.5783987

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[46] Diego Ruiz, Guillermo San Miguel, et al. –Life cycle inventory and carbon footprint assessment of wireless ICT networks for six demographic areas (2021) *Resources, Conservation & Recycling*

[47] Zhang, X., & Wei, C. The Economic and Environmental Impacts of Information and Communication Technology: A State-of-the-Art Review and Prospects (2022) Resources, Conservation and Recycling

[48] The Overlooked Environmental Footprint of Increasing Internet Use (2021) Obringer, R., Rachunok, B., Maia-Silva, D., Arbabzadeh, M., Nateghi, R., & Madani, K. – Resources, Conservation and Recycling

[49] Williams, L., Sovacool, B. K., & Foxon, T. J., The Energy Use Implications of 5G: Reviewing Whole Network Operational Energy, Embodied Energy, and Indirect Effects (2022) *Renewable and Sustainable Energy Reviews 157 (2022) 112033*

[50] Shehabi, A., Walker, B., & Masanet, E.,, The Energy and Greenhouse-Gas Implications of Internet Video Streaming in the United States (2014) *Environmental Research Letters*

[51] The Overlooked Environmental Footprint of Increasing Internet Use (2021) Obringer, R., Rachunok, B., Maia-Silva, D., Arbabzadeh, M., Nateghi, R., & Madani, K. – Resources, Conservation and Recycling

- Will the building implement energy-saving policies such as automatic shutdown of unused wireless access points during off-hours?

Attachments

- Balmori, A. (2022). Evidence for a health risk by RF on humans living around mobile phone base stations: From radiofrequency sickness to cancer. *Environmental Research*, *214*, 113851.
- Davis, D., Birnbaum, L., Ben-Ishai, P., Taylor, H., Sears, M., Butler, T., & Scarato, T. (2023). Wireless technologies, non-ionizing electromagnetic fields and children: Identifying and reducing health risks. *Current Problems in Pediatric and Adolescent Health Care*, *53*(2), 101374.
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U.S. policy on wireless technologies and public health protection: regulatory gaps and proposed reforms

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The current U.S. regulatory framework governing non-ionizing radiofrequency radiation (RFR) used in all wireless technology is outdated and lacks adequate protection, oversight, and enforcement. The U.S. Federal Communications Commission (FCC) was given regulatory jurisdiction by the U.S. Congress in 1996 over RFR exposure standards setting even though FCC has no in-house expertise regarding health or environmental effects from RFR. FCC is a licensing/engineering entity that relies on other government agencies for guidance on ambient exposures and devices. However, all relevant civilian public health and environmental agencies have been defunded from non-ionizing radiation research activities and oversight. Thus, current regulations have remained unchanged since 1996. Human exposure limits are designed to protect against short-term high-intensity effects, not today's long-term chronic low-intensity exposures. Scientific evidence indicates that children's thinner skulls, unique physiology, and more conductive tissues result in significantly higher RFR absorption rates deeper into critical brain regions, which are still in development and thus more sensitive to environmental insults. However, current policies offer no safeguards for children/pregnancy or vulnerable populations. Growing research also indicates risks to wildlife, especially pollinators. In 2021, a U.S. federal court mandated that the FCC show proper review of growing scientific evidence, after a cursory FCC re-approval of limits in 2019, but FCC has yet to respond. This paper explores regulatory infrastructure deficiencies, including the absence of monitoring/oversight, premarket safety testing, post-market surveillance, emissions compliance/enforcement, occupational safety, and wildlife protection. Compliance tests for cell phones do not reflect real-world consumer use and can therefore camouflage exposures that exceed even FCC's outdated limits. Other countries enforce stricter limits, robust monitoring, transparency measures, and compliance programs with additional policies to protect children. Also discussed is the chronic revolving door between FCC leadership and the wireless industry, resulting in a state of regulatory capture. Policy recommendations for common-sense reforms are made for reinvigorating independent research, developing science-based safety limits, ensuring pre- and post-market surveillance, and improving oversight/enforcement, as well as implementing risk mitigation to reduce exposures to children, vulnerable groups, and wildlife.

KEYWORDS

radio-frequency, electromagnetic fields, Federal Communications Commission, ICNIRP, wireless technology, non-ionizing, cell tower, cell phone

Introduction

Wireless communication is now ubiquitous in our homes, schools, workplaces, and the ambient environment, leading to increased daily exposures to non-ionizing electromagnetic fields (EMF) across all age groups, starting before birth (1–3). All wireless technologies create non-ionizing EMF exposures that are not naturally occurring on Earth (2). Unlike natural EMFs such as the sun and the Earth's geomagnetic fields, with which humans and all living things evolved, anthropogenic wireless signals are complex (4). A radiofrequency (RF) carrier wave is pulsed and modulated to transfer data (video, voice, etc.), creating polarized and highly variable, intermittent signals with lower frequency (ELF/ULF/VLF) intensity variations (3, 5, 6). Environmental levels have increased over the last century, and recent telecommunication upgrades to broadband create a wide swath of simultaneous exposures to multiple modulated frequencies (3). Recent publications emphasize how the complex signaling characteristics (e.g., modulations) of a wireless signal, alongside various environmental and biological parameters, are key to biological impacts (3, 4, 6–8). Most of these factors, however, are overlooked in existing regulations, which focus solely on the carrier wave frequency and power density (8, 9).

For decades, the prevailing assumption underpinning current human exposure guidelines is that because wireless technologies are non-ionizing and lack sufficient energy to break chemical bonds or directly damage DNA, they can only produce harmful effects through heating (thermal) mechanisms (10). This assumption is the basis for the exposure limits of the U.S. Federal Communications Commission (FCC), as well as the Institute of Electrical and Electronics Engineers (IEEE) and the International Commission on Non-Ionizing Radiation Protection (ICNIRP) (10–12). However, this assumption has been roundly challenged by scientific groups such as the International Commission on Biological Effects of Electromagnetic Fields (ICBE-EMF) and others, which argue the ionizing/non-ionizing dichotomy is outdated as adverse biological effects from low-intensity exposures are now well documented (8, 10, 13–19). They conclude that the exposure limits set by the FCC, IEEE and ICNIRP are unable to adequately protect since they are only designed to address the effects of heating from short-term high-intensity exposures, but not for the effects of long-term low-intensity cumulative exposures (8, 10, 13–19).

Numerous studies have reported increased cancer (20–23) and oxidative stress (8, 24, 25) along with genetic (26–28), epigenetic (29–31), reproductive (32–35), endocrine (36, 37), and nervous system (38–42) impacts at exposure levels below the FCC and ICNIRPs heat-based threshold of harm (43–45). Multifrequency (46, 47) and synergistic or combination effects with other environmental exposures, ionizing radiation, chemicals, drugs, and metals have also been reported (48–54). While the FCC, ICNIRP, and IEEE discount EMF non-thermal effects as not established, non-ionizing frequencies are increasingly researched/used in medical applications specifically because of their non-heating effects (55–63).

Furthermore, despite the widespread use of wireless devices by children, FCC limits and test procedures are based on a model of a 220-pound adult male (19, 64), disregarding the unique anatomical and physiological characteristics of children and the developing fetus as well as the increased sensitivity of their rapidly developing brains and bodily systems (19, 65–67). Engineering studies have demonstrated that children's thinner skulls, distinctive physiologies, and more conductive brain tissue result in significantly higher RFR absorption rates, especially in brain regions critical for memory and learning, such as the cerebellum and hippocampus (68–70).

This paper examines the current regulatory framework governing wireless and health, asking:

- What are the standards and guidelines on which FCC regulations are based?
- How did U.S. federal agencies develop the current RFR limit?
- What are the current EMF bioeffect research activities of relevant U.S. federal agencies?
- How have laws and legal decisions shaped governments' response to possible public health impacts?
- Do current practices and agency activities ensure adequate oversight and protection?
- How does the US policy approach compare to other countries?
- Is there evidence of regulatory capture?
- What reforms are needed to address regulatory gaps?

What are the standards and guidelines on which FCC regulations are based?

FCC human exposure limits for RFR are referred to as thermal limits because they are designed primarily to address the effects of heating. The origin of U.S. thermally based limits dates to Cold War era military research prompted by the development of radar and wireless technologies in WWII (71). In 1953, the Naval Research Laboratory was tasked to investigate radar health effects after the widespread circulation of a Hughes Aircraft Corporation Report by John T. McLaughlin, MD, documenting his observations of cancers, purpura, internal bleeding and other health issues in addition to a "…universal complaint of headaches by personnel working in the vicinity of microwave radiation." [(72), p. 336]. The report prompted the U.S. Air Research and Development Command and the Navy to convene a series of meetings in which a limit was ultimately adopted based on a calculation by Dr. Herman P. Schwan, a German biophysicist at the University of Pennsylvania who had long worked on the electrical properties of biological materials had come to America under Project Paperclip, a program that brought former German scientists to the U.S. after WWII (71, 73). Schwan recommended 10 mW/cm^2 (0.01 W/cm^2) as the critical exposure level based on theoretical calculations of how much heat the body could tolerate and dissipate without significantly increasing body temperature. This threshold was not informed by epidemiological or experimental data regarding health impacts or disease risk. Schwan's limit and the assumptions behind it became the foundation for most subsequent Western standards, including today's FCC limits.

From 1957 to 1960, the Tri-Service Electromagnetic Radiation Bioeffects Program, a joint initiative of the U.S. Air Force, Navy, and Army, conducted an extensive 4-year research effort aimed at

investigating microwave health effects (71, 74). Most experiments were of short duration with high intensities (not long-term, low-intensity), observing impacts above 100 mW/cm^{2,} confirming the view that non-thermal effects did not exist (72). A safety factor of 10 was incorporated, notably more lenient than the 100- and 1,000-factor safety margins proposed by General Electric and Bell Labs, respectively (75, 76), resulting in a match to Schwan's original recommendation. Although Colonel George M. Knauf, scientific coordinator at the Air Force Rome Air Development Center, stated that the limit had "been arbitrarily established," [(77), p. 36], he resisted suggestions to use a more stringent limit and concluded that the subsequent Tri-Service research did not "…shake our faith in the validity of this arbitrary level" [(71), p. 1233]. In 1962, Schwan became chair of the United States of America Standards Institute, precursor to the American National Standards Institute (ANSI), C95.1 committee, and proposed that they issue his recommended 10 mW/cm^2 limit, which they ultimately did in 1966 (71, 78).

Although the 1966 limit was not a formal federal standard, the limit and its updates were used de facto by the military and others for decades despite numerous government reports documenting accumulating scientific research on both heating and non-heating impacts. Dr. Zorach R. Glaser compiled over 2,000 studies reporting behavioral, cardiovascular, neurological, ocular, and endocrine impacts in a 1971 Naval Medical Research Institute (NMRI) Report (79), later updated to over 4,600 studies in a 1977 report which Glaser issued under the National Institute of Occupational Safety and Health (NIOSH) (79–82).

Beginning in 1976 until at least 1987, the Office of Naval Research, along with the National Telecommunications and Information Administration, produced quarterly *Biological Effects of Non-ionizing Radiation* reports, which included the ongoing research conducted in the Soviet Union (83). These publications compiled full research abstracts, including numerous reports of biological effects at non-thermal exposure levels that concluded more research was needed. Soviet literature in these reports described significant neuroendocrine and nervous system impacts as well as cardiovascular alterations, immune system changes, reproductive effects, and behavioral disturbances, many occurring at levels below Schwan's limits.

How did U.S. federal agencies develop current RFR limits?

The Environmental Protection Agency, with authority regarding ionizing and non-ionizing radiation exposures, has historically played a lead role in this subject. Although the agency was repeatedly tasked with developing federal safety standards for public exposure to RFR over several decades (84, 85), its attempts were unsuccessful, and proposed limits were never finalized (86). This section outlines how U.S. limits were not derived through a public health agency-led risk assessment process but rather by the FCC's adoption of standards developed by military and industry-affiliated groups.

In 1978, the U.S. Comptroller Report recommended that the EPA establish RFR standards highlighting several studies that found biological impacts at low non-thermal intensities, below the 10 mW/cm^2 ANSI limit, and described how the EPA already had 5 professionals using a mobile van equipped with a measurement system to monitor environmental levels (85).

While the EPA ramped up its research, ANSI and IEEE further developed their standards as detailed in Table 1. Their 1982 limit introduced the whole-body Specific Absorption Rate (SAR), a measure of the rate of absorption into tissue, as the relevant metric (87). The SAR limit of adverse effect was based on the original Tri Service era assumption that heating was the primary and only established effect. As described by the ICBE-EMF in their paper detailing the inaccuracies of the assumptions underlying FCC and ICNIRP limits, "these limits were based on results from behavioral studies conducted in the 1980s involving 40–60-min exposures in five monkeys and eight rats, and then applying arbitrary safety factors…" (10). The behavioral studies measured the internal temperature at which exposed animals stopped food-seeking behavior. Thus, the SAR limit was not based on risk modeling from long-term carcinogenicity or epidemiological health studies.

Importantly, the ANSI/IEEE 1982 standard noted non-heating related effects at SAR levels below 4W/kg but discounted their relevance. For example, page 13 states, "…modulation-specific effects, such as efflux of calcium ions from brain materials were not considered adverse because of the inability of the subcommittee members to relate them to human health" (87). ANSI/IEEE also noted (page 14), "other characteristics of an incident field such as modulation frequency and peak intensity may pose a risk" and (page 15) that "peak SARs in a biological body can range more than an order of magnitude above the average SAR over a limited mass of the exposed tissue".

Later that same year, the EPA announced its intention to establish federal RFR limits in the *Federal Register* stating, "The continuing and rapidly increasing number of radiofrequency radiation sources in communications, transportation, defense, industry, consumer products, security, and medical applications has produced a RFR environment to which the entire population is continuously exposed, has increased the magnitude of environmental levels to which members of the public are exposed, and has increased the number of persons exposed to higher environmental levels" [(88), p. 57339].

In 1984, the U.S. Science Advisory Board (SAB), an independent advisory committee to the EPA (89), reviewed the EPA's draft report on biological impacts of EMFs and stated that the report represents an adequate statement of the current scientific literature and can serve as a scientifically defensible basis for the EPA's development of radiation protection guidance (90). The SAB recommendation includes quotes from numerous agencies going back years, requesting the EPA develop human exposure limits. Internal documents indicate EPA's proposed safety limit for exposure was ten times stricter than the ANSI/IEEE 1982 guidelines, but the proposal was never issued due to conflicts within the agency (91).

In 1985, the EPA's Report *The Biological Effects of Radio Frequency Radiation* was released, which concluded a critical level of adverse effects at a SAR threshold of 1 W/kg (92). This threshold is notably lower by a factor of 4 than the 4 W/kg threshold of ANSI/IEEE C95.1-1982, which the FCC adopted as its guideline

TABLE 1 Timeline of key RFR exposure standards and reports leading to U.S. guidelines.

Date	Standard	Limit
1966	ANSI C95.1-1966	The first U.S. consensus standard adopted Schwan's recommendation of 10 mW/cm^2 to address heating impacts.
1971	ANSI C95.1-1971	ANSI retained 10 mW/cm^2 as an occupation guideline, averaged over 6 minutes. OSHA adopted the ANSI limit, ruled to be advisory only.
1978	U.S. Comptroller Report	The report *More Protection from Microwave Radiation Hazards Needed* recommended that the EPA establish an environmental exposure standard to protect the general public and that the Occupational Safety and Health Administration (OSHA) establish an occupational limit to protect workers based on a current evaluation of scientific data (85).
1982	ANSI/IEEE C95.1 1982	Introduced frequency-dependent limits for power density. The SAR threshold of adverse effects was 4 watts per kilogram (4 W/kg) SAR over the whole body based on animal behavioral disruption studies. A reduction of ten was incorporated to arrive at the limit 0.4 W/kg for whole body SAR. This limit was adopted by the FCC in 1985.
1986	NCRP Report No. 86	National Council on Radiation Protection (NCRP) report, based on literature though 1982, iterated the 4 W/kg thermal threshold but recommended public limits be one-fifth of the 0.4 W/kg worker limit resulting in a.08 W/kg whole body SAR limit. The averaging time was extended from 6 minutes (workers) to 30 minutes for the public. NCRP introduced localized SAR limits for exposure from devices close to the body of 1.6 W/kg for the public and 8 W/kg for workers.
1986	EPA Proposes 4 Options for RFR Limits	The EPA proposed 4 options for RFR limits along with associated financial costs and concluded that adverse human health effects were associated with whole-body average SARs of 1 to 4 W/kg or greater (93, 94). Options 1- 3 were 0.04, 0.08 and.4 W/kg respectively. Option 4 was to develop technical information, not a limit, to control exposure.
1991/1992	ANSI/IEEE C95.1 1992	IEEE introduced controlled (worker) vs uncontrolled (public) limits, still based on the 4 W/kg heating effect threshold. They maintained the.4 W/kg (10x reduction) whole body SAR for workers and set 0.08 W/kg (5x reduction) for public exposure, extending the averaging time from 6 minutes (workers) to 30 minutes for the public. ANSI ratified the limit in 1992 (95).
1993	FCC 93-142 Proposal to Adopt RFR Limits	FCC initiates a Notice of Proposed Rulemaking (NPRM) which recommends using the IEEE C95.1 1992 standard but requests comments on possible alternatives such as NCRPs lower limits for 1.5 to 300 GHz frequencies.
1995	EPA launches renewed research effort toward recommending human exposure guidelines.	The EPA presented a timeline to the FCC on its renewed efforts toward developing a safety limit that addressed both heating effects and modulation, convened a revived interagency workgroup (RFIAWG), and commissioned the NCRP to study the potential role of modulated RFR bioeffects (84, 86). Ultimately, the NCRP study and EPA's efforts were not completed.
1996	FCC Adopts RFR Limits	FCC adopts RFR limits based on both NCRP Report No. 86 and IEEE/ANSI C95.1 1992

for new wireless facilities that same year, stating that RFR was a proper environmental concern of the agency (96). In 1986, when the EPA finally proposed possible federal limits, they stated that adverse effects were associated with SARs starting at 1 W/kg, and their research summary highlighted non-thermal effects such as calcium efflux, the potential for cancer promotion, and frequency-specific effects such as changes in brain energy metabolism (93, 94). Ultimately, the agency never issued a decision in the proceeding.

The EPA also never completed another review of the science on the biological effects after its 1984 report. While fully reviewing the intertwined policy history of powerline frequency EMF and magnetic fields is beyond the scope of this paper, it is important to note that, like RF, federal agencies never developed a safety standard for these lower frequency non-ionizing exposures. Reports on non-ionizing EMFs were drafted and redrafted but never finalized (97, 98). In 1990, the EPA released a draft report that recommended designating powerline-frequency EMFs as "probable human carcinogens" and RFR as a "possible human carcinogen" [(97), p. 1]. This conclusion was deleted from the subsequently released draft, which stated it was inappropriate to compare EMFs to chemical carcinogens and EMFs were a possible, but not proven, cause of cancer in humans (99). The EPA Science Advisory Board (SAB) and federal agencies repeatedly reviewed the draft, but it was ultimately shelved (100).

All the while, the U.S. stayed up to date on the ongoing research, including that of the Soviet Union and Eastern Europe. The 1988 Air Force Report on the biological effects of RFR includes an overview of research that found cardiovascular, immunological, and hematological effects, stating, "…exposure to RF/MW radiation is known to have a biological effect on animals and humans. Damage to major organs, disruption of important biological processes, and the potential risk of cancer represent the dangers of RF/MW radiation to living organisms. Pulsed radiation appears to have the greatest impact on biological materials" [(101), p. 2]. Yet in 1991, when IEEE revised the ANSI limits and introduced limits for the general public (see Table 1), they argued against a larger limit reduction for the general public because "no reliable scientific data exists" showing certain population subgroups are more at risk or that duration of exposure can impact risk (95). Again, they stated that non-thermal and modulation-specific effects were not meaningfully related to human health.

Importantly, the EPA stated in 1995 that it was poised to issue RFR limits (102). As shown in the EPAs presentation (Figure 1), Phase 1 would address thermal effects (understood as not including modulation or chronic exposure), and Phase 2 would address biological impacts of modulated and non-thermal exposures. However, again, EPA's work on developing safety limits was halted. That year (1995) the Senate Committee on Appropriations cut $350,000 from the EPA EMF budget, because "the committee believes EPA should not engage in EMF activities" [(103), p. 5]. The U.S. House of Representatives also cut EMF programs. In addition to the budget cuts, several staffers reportedly blamed the dismantling of the research program on senior officials for not wanting to revisit such a controversial subject (98), some of whom then went on to work for the telecommunications industry (104).

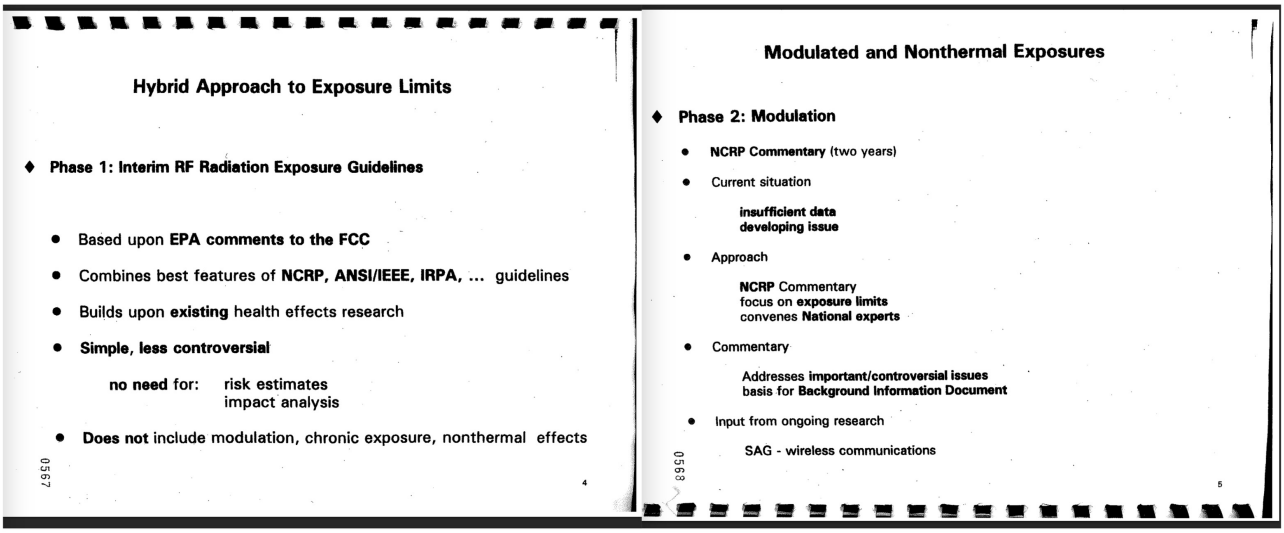

FIGURE 1
1995 briefing for the FCC by the EPA on the development of RFR exposure guidelines (102). Figure from U.S. government document in the public domain (102).

FCC promulgates human exposure limits in 1996

In 1996, with the EPA's standards development shuttered, the FCC adopted limits (Table 2) (9, 105) based on recommendations from the ANSI/IEEE C95.1-1992 standard (95) and the NCRP 1986 Report (106), which are both based on the 4W/kg SAR heating threshold of harm identified in acute animal studies conducted in the 1980s and earlier (10). Thus, FCC limits are not federally established, health-protective safety standards for long-term exposure, as they were not developed through a formal hazard/risk assessment that evaluated toxicity and dose response by health agencies (107).

The National Toxicology Program animal studies

The U.S. Food and Drug Administration (FDA), aware of the data gaps regarding long-term, chronic exposures, nominated the National Toxicology Program (NTP) under the National Institute of Environmental Health Sciences (NIEHS) to conduct large-scale animal research on carcinogenicity in 1999 because "…the existing exposure guidelines are based entirely on protection from acute injury from thermal effects of RFR exposure and may not be protective against any non-thermal effects of chronic exposures" [(108), p. 2].

The ensuing NTP research effort spanned decades. As presented in the 2008 U.S. Congressional (109) and 2009 U.S. Senate (110) subcommittee hearings on cell phone radiation health effects, the NTP built special chambers and initiated large-scale animal studies exposing rats and mice to cell phone radiation for up to 2 years. In 2018, the NTP final report concluded significantly increased gliomas of the brain and schwannomas of the heart in male rats (111). An expert peer review panel concluded the schwannoma data indicated "clear evidence" of an association between RFR and cancer. Additionally, DNA damage, reduced pup birth weights, and the induction of cardiomyopathy of the right ventricle of the heart were observed (111, 112). Notably, when New Hampshire 5G Commissioner Denise Ricciardi asked, "You found damage, so doesn't that mean that FCC's assumption that only heating can cause damage is incorrect and no longer accurate?" NTP's scientist Michael Wyde replied, "A lot of people believe unless you heat tissues, you won't see health effects with RF. This study disproves that, as we did not have overheating, but we did see damage" [(113), p. 139].

However, the FDA disagreed with the conclusions and repeatedly issued statements discounting the animal study's relevance to humans (114, 115) despite NTP's own experts maintaining that the findings were relevant to human health assessment (19, 112, 116). Further, the FDA did not release any reports providing a quantitative risk assessment on the NTP study data to inform an understanding of the implications for human health. Published analysis of the NTP data by non-government U.S. scientists concluded that FCC human exposure limits should be strengthened by at least 200-to 400 times to protect children (45).

Nonetheless, in 2019, the FCC terminated its 7-year inquiry, which had asked if the 1996 limits needed to be revised (117). Referencing the FDA's dismissal of the NTP findings, the agency announced the 1996 limits were adequately protective, stating, "We take to heart the findings of the Food & Drug Administration (FDA)... that the weight of scientific evidence has not linked cell phones with any health problems" [(172), p. 2]. The IEEE and ICNIRP subsequently issued revised RF-EMF exposure limit recommendations, discounting the NTP study findings and reiterating that acute heating effects were the only established harm (11, 12).

Although the NTP later initiated new studies to investigate the DNA damage they had observed (118), in 2024, they stated

TABLE 2 FCC general public (A) and occupational (B) limits for RFR: SAR limits and maximum permissible exposure (MPE) limits.

A. FCC limits for general public/uncontrolled exposure to RFR				
Specific absorption rate (SAR) limit				
Whole body SAR	Local SAR head and trunk	Extremity local SAR hand, wrist, feet, ankle, pinna (outer ear)		
0.08 W/kg Averaged over whole body	1.6 W/kg averaged over 1 gram cube of tissue	4.0 W/kg averaged over a 10-gram cube of tissue		
Maximum public exposure (MPE) limit				
Frequency range (MHz)	Electric field strength (V/m)	Magnetic field strength (A/m)	Power density (mW/cm^2)	Averaging time (minutes)
0.3–3.0	614	1.63	(100)	30
3.0–30	842/f	2.19/f	($180/f^2$)	30
30–300	27.5	0.073	0.2	30
300–1,500			f/1,500	30
1,500–100,000			1.0	30
General public limits apply in situations in which the general public may be exposed, or in which persons that are exposed as a consequence of their employment may not be fully aware of the potential for exposure or cannot exercise control over their exposure. Public limits are used for consumer devices such as cell phones (9, 105). f, frequency in MHz.				
B. FCC limits for occupational/controlled exposure to RFR				
Specific absorption rate (SAR) limit				
Whole body SAR	Local SAR; head and trunk	Extremity Local SAR; hand, wrist, feet, ankle, pinna (outer ear)		
0.4 W/kg; averaged over whole body	8.0 W/kg; averaged over 1 gram cube of tissue	20.0 W/kg; averaged over 10 grams of tissue		
Maximum public exposure (MPE) limit				
Frequency Range (MHz)	Electric Field Strength (V/m)	Magnetic Field Strength (A/m)	Power Density (mW/cm^2)	Averaging Time (minutes)
0.3–3.0	614	1.63	(100)	6
3.0–30	1,824/f	4.89/f	($900/f^2$)	6
30–300	61.4	0.163	1.0	6
300–1,500			f/300	6
1,500–100,000			5	6
Occupational limits apply when exposure occurs as a consequence of employment provided the individual is "fully aware" of the potential for exposure and can exercise control over the exposure. "Fully aware" means the person has received written and/or verbal information explaining the potential for RFR exposure. With the exception of transient persons, "fully aware" also means the person has received appropriate training regarding work practices relating to controlling and mitigating exposure. Occupational limits also apply where exposure is of a transient nature as a result of incidental passage through a location where levels may be above general population limits, as long as the exposed person has been made fully aware of the potential for exposure and can exercise control over his or her exposure by leaving the area or by some other means (9, 105). f, frequency in MHz.				

MPE limits are frequency-dependent and are generally used for compliance related to the ambient environmental levels created by cell towers and wireless network infrastructure. "Portable devices" are defined as devices (such as cell phones) used within 20 cm of the user's body, and they require compliance with local SAR limits for 100 kHz to 6 GHz and power density limits for frequencies above 6 GHz.

that these follow-up studies had ceased because it was "technically challenging and more resource-intensive than expected" (119). They released a 2025 report documenting a lack of effects in one completed 5-day pilot study but state that, "high-quality studies to understand the effects of RFR exposure on biological responses are needed given the widespread human exposure to RFR associated with cell phone use" (120). Despite the 5.3-million-dollar price tag, the exposure system for the follow-up research was "disassembled following completion of the studies, and the chambers are not available for other scientists" (121).

What are the current EMF bioeffect research activities of relevant U.S. federal agencies?

While the push to fast-track wireless development is framed as a geopolitical race with China and Russia (122), these nations, along with the European Union, India, and numerous other governments, at least fund research programs studying health and wildlife impacts of wireless technology (123–126). Absent from the U.S. is a parallel effort to ensure rigorous science-based

evaluation (127). As detailed in Supplementary material 1, U.S. agencies, defunded years ago, lack current research activities and administer little oversight, allowing industry to successfully use the race narrative to support deregulation efforts at the federal, state, and local levels (128).

Supplementary material 1 lists details the near absence of current EMF bioeffect research activities by key U.S. agencies and entities including the Environmental Protection Agency (EPA), National Institute for Occupational Safety and Health (NIOSH), Department of Labor Occupational Safety and Health Administration (OSHA), National Cancer Institute (NCI), Centers for Disease Control and Prevention (CDC), Food and Drug Administration (FDA) and the U.S. Fish and Wildlife Service (USFWS), the U.S. Radiofrequency Interagency Work Group (RFIAWG), FDA's Technical Electronic Product Radiation Safety Standards Committee (TEPRSSC) as well as the recent directive that Health and Human Services (HHS) report on knowledge gaps.

Notably, in 1999 and 2003, federal experts of RFIAWG issued a critique of federal limits as "outdated and insufficiently protective," highlighting 17 critical issues including the lack of biological basis, inadequate dosimetric modeling, failure to address modulated exposures, flaws in the two-tier occupational/public system, insufficient attention to long-term health effects and problems with how averaging over time and tissue volume can mask peak exposures. They called for a comprehensive scientific review with evidence-based standards to better protect public and worker health (129, 130).

While most U.S. federal agencies maintain web content with broad, often dismissive statements about health risks, none have issued formal health risk evaluations evaluating the totality of current scientific evidence. Although the FDA did release a literature review (131) dismissing the NTP findings, its conclusions of safety were roundly criticized on several counts, including a lack of adherence to quantitative risk assessment methodology (132). Further, the report was narrowly focused and confined to cell phones and cancer, omitting all consideration of non-cancer health endpoints and of effects from environmental exposures. No health agency other than the FDA has issued any type of report attempting to review the issue since the 1986 EPA Report. Mouzaffar states that "the FCC and FDA have failed in their obligation to prescribe safe RFR guidelines produced from wireless communication devices to protect the public health and safety" [(133), p. 227].

With NTP research halted, the only ongoing studies appear to be conducted within the Department of Defense. James Lin, former ICNIRP Commissioner, states that the recent research at the Air Force RF Bioeffects Branch and the Defense Advanced Research Projects Agency (DARPA) represents a "paradigm shift" into exploration of non-thermal impacts (134). Their studies utilizing FCC-compliant exposures have reported epigenetic impacts and brain pressure levels from pulsed microwaves comparable to football injuries (31, 39). In 2019, the Air Force Radio Frequency (AFRF) Bioeffects Branch awarded a $30 million contract to General Dynamics Information Corporation (135) with the initial solicitation stating that research results would be utilized for national and international health and safety standards and used for Air Force occupational safety, as well as to support the development of directed energy technologies (136, 137). In 2025, another solicitation was posted at $39.7 million (138). However, there is no evident coordination with non-civilian agencies, as the Air Force did not submit comments to the FCC in its RF-related proceedings (117).

The World Health Organization (WHO)

With federal reports lacking, the WHO is often referenced as an authority. However, the existence of two separate entities housed under the WHO umbrella, the EMF Project and the World Health Organization's International Agency for Research on Cancer (WHO/IARC) has complicated the public and policymakers' understanding of the WHO's conclusions on RFR safety.

In 2011, the WHO/IARC classified wireless RFR as "possibly carcinogenic" (Group 2B) (139). Their advisory group has, in 2019 and again in 2024, recommended wireless RFR be re-evaluated as a high priority (140, 141) due to the epidemiological and experimental animal studies published since 2011. Several analyses, disagreeing with the ICNIRP, IEEE and FDA's dismissal of the NTP, conclude that the animal experiments of the NTP, along with those of the Ramazzini Institute in Italy [which used much lower wireless exposures than the NTP to mimic cell tower environmental levels (45)] have strengthened the evidence base and could justify the WHO/IARC upgrading the classification of RFR to a "probable" or even to "known" human carcinogen (16, 20, 23, 112, 142, 143). However, as of this writing, the WHO/IARC has yet to announce a date to convene expert working groups on RFR.

In contrast to the WHO/IARC, which removed scientists from its working group in 2011 due to conflicts of interest (144), the EMF Project has been criticized for its longstanding ties with industry and ICNIRP (76, 145–147). Michael Repacholi, the first chairman of ICNIRP, suggested that the WHO start the EMF Project in 1995, and he arranged for a large part of its financing to be from the telecommunications industry (76, 145).

The FCC referenced the WHO EMF Project webpages in support of its 2019 decision that its RFR limits were adequate (148). However, at that time, the EMF Project's last completed review on RFR health risks dated to 1993 (149). More recently, the WHO EMF Project has commissioned a series of systematic reviews on several health endpoints (150). While most of the reviews concluded the evidence did not show adverse effects and that more research was needed, these reviews have been sharply criticized by independent scientists (134, 151–156) for "numerous flaws, significant methodological concerns, as well as likely biases" which "undermine the validity of the authors' conclusions and raises serious doubts about the suitability of most of these reviews for informing policy or risk management decisions (156). While one or more members of ICNIRP were involved in each systemic review (156), none of the WHO-commissioned review scientific teams included any of the over 250 scientists who signed the EMF Appeal, a petition to the United Nations by international scientists calling for stronger protections from non-ionizing EMFs (15, 157). However, safety cannot be assured from these reviews as the WHO-commissioned review on animal experimental evidence and cancer did conclude that there was "high certainty" evidence associating

RFR with two tumors, gliomas and schwannomas, also reported in human studies of long-term cell phone use (158).

Further, while the WHO commissioned reviews are referenced as "one of the most comprehensive evaluations of environmental health evidence to date" [(150), abstract], they did not include reviews focused on endpoints such as genotoxicity, synergistic effects, and impacts to the immune and endocrine systems.

How have laws and legal decisions shaped governments' response to possible public health impacts?

Section 704 of the Telecommunications Act (TCA) of 1996 prohibits state and local governments from regulating cell tower placement based on "environmental effects" of RFR emissions, as long as emissions comply with FCC limits (159). This provision has been interpreted by some courts as a federal preemption, allowing it to serve as both a regulatory safe harbor, shielding the industry from liability for health-related damages, and a de facto gag rule, silencing public discussion and allowing industry to threaten lawsuits when health is raised during public hearings/siting decisions (159–161). Before the passage of the TCA, many state and local authorities had adopted ordinances that restricted the number and location of wireless towers and base station antennas due to health concerns (160). But now these governments, which have a statutory responsibility to protect the health, safety, and welfare of citizens, have been largely stripped of their ability to protect schools, homes, and wildlife areas.

The situation is a legal quagmire as federal agencies have failed to ensure up-to-date, rigorous scientific reviews, yet policymakers are effectively barred from voicing concerns that risk could exist as federal regulations are outdated. Section 704 not only prevents most decision-makers from expressing health-related justification for distancing cell towers from schools and homes, but it also denies judicial remedies and due process, offering no avenue to mitigate risk or any avenue to address harm (159–161).

Section 704, as applied, transgresses several constitutional issues, many of which have been raised in legal challenges over the years without avail due to one primary early ruling, *Cellular Phone Taskforce v. FCC* (162). In this case, filed just after the FCC promulgated its 1996 limits, numerous groups and petitioners argued that the FCC's RFR limits failed to account for evidence of non-thermal health effects. In 2000, the Court sided with the FCC, enshrining deference to its federal authority, based on the assumption that the FCC "could reasonably" expect agencies such as the EPA "to keep abreast of scientific developments in carrying out their missions" (162). The *Cellular Phone Taskforce* case became the cornerstone for all subsequent telecom cases when courts routinely deferred to the FCC authority regarding RFR emissions.

In the subsequently filed Petition for Writ of Certiorari, the U.S. Supreme Court was asked to review the decision by the petitioners' attorneys, including Whitney North Seymour, Jr. a former New York State Senator, former U.S. Attorney for the Southern District of New York and co-founder of the Natural Resources Defense Council (163). The petition highlighted the lack of federal agency activities as the central material error in the Second Circuit court's ruling that begs for re-argument today asking:

> "Where Congress has failed to fund continuing Federal research into potential adverse health effects of radiation emission from cellular phone towers, does Congress have the power to prohibit State and local governments from protecting the health of their citizens by taking into account available research and official standards from other countries in regulating the placement of cellular phone towers?" [(163), p. 1]

The Petition argued that:

> "…dated, inappropriate research, reviewed by authorities from inappropriate professions, is being used to reach conclusions about public safety concerning radio frequency radiation. Why has there been no better updating of the FCC standards? The answer is obvious: because Congress has not appropriated adequate funds to conduct non-thermal research by the key federal agency—EPA."
>
> "The Court's reliance on the EPA was technically correct but substantively naive. What the Court did not realize was that Congress terminated funding for radiation research by EPA in 1996, and no staff has been available at EPA to conduct such research for the past five years" [(163), p. 14].

In other words, the FCC did not have adequate expertise from the appropriate government agency to rely on regarding health effects from ambient RFR exposures. The Supreme Court did not take up the case in 2000. But now, over two decades later, the petition's arguments are even more relevant: no independent federal agency with environmental or health expertise is actively monitoring RFR risks from cell towers, and local governments remain hamstrung, fearing industry lawsuits should they speak on the issue of health effects in infrastructure siting decisions. While the FCC stated in its 2013 Inquiry, "…since the Commission is not a health and safety agency, we defer to other organizations and agencies with respect to interpreting the biological research necessary to determine what levels are safe" [(164), p. 3], there is no federal agency to defer to. This situation is more germane than ever for another legal challenge.

Federal court mandates FCC provide rationale for maintaining 1996 RFR limits

The second major challenge to FCC limits came after the agency decided to maintain its 1996 limits in 2019. In 2021, the U.S. Court of Appeals for the D.C. Circuit ruled in *Environmental Health Trust et al. v the FCC* (see Table 3) that the FCC's decision was "arbitrary and capricious," citing the agency's failure to address evidence submitted to the agency reporting a myriad of harmful effects at levels permitted under current regulations [(165), p. 9]. The FCC was ordered to explain how its limits were adequately protective on six issues: non-cancer health impacts, long-term effects, children's vulnerability, environmental impacts, compliance test procedures, and the significant technological changes/advances since 1996. As

TABLE 3 Timeline: Environmental Health Trust et al. v the FCC lawsuit on U.S. human exposure guideline inquiry.

Year	Event/action	Description
2012	GAO Report: "Exposure and Testing Requirements for Mobile Phones Should Be Reassessed" (171)	The Government Accountability Office (GAO) report recommended that the FCC formally reassess and, if appropriate, update its exposure limits and cell phone SAR test requirements stating: "The FCC RF energy exposure limit may not reflect the latest research, and testing requirements may not identify maximum exposure in all possible usage conditions" [(171), Highlights p. 1].
2013	FCC Opens Inquiry on RFR Exposure Limits (ET Docket No. 13–84) (117)	The FCC Inquiry requests comment on whether its 1996 RFR human exposure limits and policies should be reassessed. In summary: • Are the 1996 exposure limits appropriate to protect public health considering recent research? • Are additional exposure reduction and precautionary policies needed, especially regarding children? If so, would they be useful or counterproductive. • Should premarket SAR evaluation procedures require direct body contact positions? • Are SAR limits protective regarding metal implants, eyeglasses, jewelry, or metallic accessories. • Should the FCC require more disclosure around RFR exposure levels "perhaps in manuals, at point-of-sale, or on a website." • Should more consumer information on RFR exposure (on health, reducing exposure, and base station exposure) be provided to the public?
2013 to 2019	Hundreds of comments submitted to the FCC record in its inquiry (ET Docket No. 13–84)	Comments on the FCCs RFR Inquiry were submitted from scientific, medical and public health organizations, local governments, school boards, researchers, medical practitioners and the public.
2019	FCC decides to maintain 1996 limits and proposes new limits for ranges not previously regulated (172)	The FCC decides to maintain its 1996 limits without further review stating there is "no appropriate basis" to revise its RFR exposure limits, additional precautionary policies are not indicated and that revising SAR tests to require body contact positions is not necessary. The FCC also proposed expanding the range of human exposure limits to include new frequencies: • 300 kilohertz (kHz) down to 3 kHz, with sources such as wireless power transfer in electric vehicles. • 100 GHz up to 3 THz for future technologies. Comments on the newly proposed limits remain open under Docket 19-226.
2020	14 petition for judicial review (173)	Petitioners argue that the FCC decided its limits did not need to be revised without meaningfully addressing record evidence of cancer, neurological impacts, reproductive harm, electromagnetic hypersensitivity (EHS), children's vulnerability, wildlife impacts and how the premarket SAR tests are outmoded. Petitioners Environmental Health Trust (EHT), Consumers for Safe Cell Phones, Elizabeth Barris, and Theodora Scarato filed in the DC Circuit. Petitioners Children's Health Defense (CHD), Michelle Hertz, Petra Brokken, Dr. David Carpenter, Dr. Toril Jelter, Dr. Paul Dart, Dr. Ann Lee, Virginia Farver, Jennifer Baran, and Paul Stanley filed in the Ninth Circuit. CHD's case was consolidated with EHT's in the DC Circuit.
2020	Amicus briefs filed (174–177)	Four Amicus Briefs were filed: • Natural Resources Defense Council • Joseph Sandri with Declaration of Dr. Linda Birnbaum • Dan and Catherine Kleiber • Building Biology Institute
2021	U.S. Court of Appeals for the D.C. Circuit ruled in EHT et al. v FCC (165)	On August 13, 2021, the DC Circuit ruled the FCCs decision to maintain its 1996 limits as "arbitrary and capricious in its failure to respond to record evidence that exposure to RF radiation at levels below the Commission's current limits may cause negative health effects unrelated to cancer" [(165), p. 9]. and mandated that the FCC provide a reasoned explanation for how its limits were adequately protective regarding: • Children's health • Health implications of long-term exposure • Impacts to the environment • Cell phone and wireless device compliance test procedures • The ubiquity of wireless devices, and other technological developments since 1996 The Court noted the lack of meaningful comments from other federal agencies stating on page 15 and 16: "The silence of other expert agencies, however, does not constitute a reasoned explanation for the Commission's decision to terminate its notice of inquiry for the same reason that the FDA's conclusory statements do not constitute a reasoned explanation: silence does not indicate why the expert agencies determined, in light of evidence suggesting to the contrary, that exposure to RF radiation at levels below the Commission's current limits does not cause negative health effects unrelated to cancer. Silence does not even indicate whether the expert agencies made any such determination, or whether they considered any of the evidence in the record." As the FCC did not appeal to the U.S. Supreme Court, the decision stands.
2025	No response from the FCC to the Court mandate as the date of this publication.	

detailed in Table 3, as of this writing, the FCC has not responded to the court's mandate.

In their decision, judges highlighted how the FCC erroneously presented the "silence" of federal agencies as supporting the FCC's limits despite no agency having submitted a substantive, up-to-date science-based assessment (165). Although the FCC had requested input, agencies such as the EPA, National Cancer Institute, and National Toxicology Program (NTP) offered only cursory comments, and the Department of Labor acknowledged its lack of formal risk assessment (166–170).

In addition, the court noted how the FCC had over-relied on the FDA's one-paragraph conclusion (165, 169). The limited scope of the FDA's literature review (focused only on pre-5 G cell phones and cancer) renders it inapplicable to the court's concerns over long-term health effects from the ambient environmental exposures from cell tower networks, 5G's higher frequencies, wildlife impacts, and any studies of reproductive, neurological, and endocrine effects. While many of these issues would fall under the EPA's purview, the agency, defunded for ambient RFR exposure oversight, only submitted a two-sentence comment to the FCC (170) and did not respond to the FCC's request for a more substantive comment.

How does the U.S. policy approach compare to other countries?

The lack of regulatory updates has resulted in the US maintaining among the most lenient limits worldwide for environmental exposures, as detailed in Figure 2. The U.S. maintains a one-size-fits-all approach without additional protections for sensitive areas, such as schools, daycares, and homes. While many countries have adopted the thermally based limits of ICNIRP, several nations have implemented more stringent thresholds based on their scientific research or precautionary frameworks that attempt to mitigate risk. Graphic 1 shows the selected country's general public limit for 1,800 MHz W/m^2 equivalent plane wave density specifically applicable to schools and/or homes (178–184). Switzerland and Italy's limits in Figure 2 apply to places of "sensitive use" such as apartment buildings, schools, hospitals, permanent workplaces, children's playgrounds, and where people stay for hours. Biologically relevant changes have been documented at very low intensities, even lower than countries' more stringent limits (10, 16–18, 22, 26–28, 31, 44, 51, 53, 185–187).

Russian research on electromagnetism, dating to the 1840s, has long recognized non-thermal impacts, and its scientists have consistently recommended limits to address their observed biological impacts to the central nervous system (182). China also has active ongoing bioeffect research, and its scientists cited studies showing immune, behavioral, neurological, and reproductive impacts at levels below the 4 W/kg SAR heat threshold as the rationale for its tighter limits (46, 47, 188). The regulatory landscape is always shifting, and several nations, such as Poland, Belgium, India, and Italy, relaxed their rules under pressure from industry, which claimed strict limits would hinder 5G deployment.

In addition, in contrast to the U.S., countries have enacted various policy measures to provide oversight, transparency, and mitigate risk as presented in Table 4 (19, 179, 181, 184, 189–193).

Do current practices and agency activities ensure adequate oversight and protection?

In addition to the near absence of civilian bioeffects research, the U.S. lacks numerous other regulatory elements related to health, safety, oversight, and enforcement.

No premarket safety testing

Unlike the process for introducing new drugs, the U.S. lacks a process that requires premarket safety testing for health effects before new RF/EMF technologies are introduced. Thus, the FCC approved deployment of millimeter-waves and sub-terahertz frequencies (194, 195) for 5G and future networks and the agency continues to allow new technologies to be deployed despite research indicating heightened rates of absorption into the skin (196, 197) as well as into insects' bodies (198, 199). The FCC's 2019 rules fast-tracked the deployment of small cells, stating that 800,000 new wireless sites in the U.S. were needed for the 5G network, despite the reality that no agency with health or environmental expertise had ongoing research activities to ensure the safety of ambient exposures.

No post-market medical or health surveillance

There is no post-market medical or health surveillance system. The public, physicians, and environmental experts lack access to a formal reporting mechanism to document symptoms, diagnoses, or observed ecological changes following RFR exposure. No public database exists to track and analyze these incidents. The absence of health and environmental surveillance hinders the identification of patterns, allows early warning signals to be missed, and prevents data-driven policy.

Outdated premarket RFR compliance tests

New phones and wireless devices can be brought to market so long as they comply with the FCC's 1996 local SAR limits. While the U.S. head/body SAR limit (1.6 W kg) is more stringent than the ICNIRP limit (2.0 W/kg), the use of a heat-based limit as well as the lenient separation distances permitted in compliance test procedures, invalidates safety comparisons. A summary of just a few of the numerous problems identified in premarket SAR tests are presented in Table 5, with more comprehensive critiques in references (10, 18, 19, 129, 130, 200).

The FCC's 2 mm SAR tests

Cell phones are not required by the FCC to be tested in direct body contact positions because the test procedures are based on pre-1996 usage scenarios when phones were worn on belt clips. French government and independent investigations have documented that cell phones can exceed exposure limits when tested in real-world direct body contact scenarios (213, 214). In 2019, the authors' Freedom of Information (FOIA) request found that when the FCC tested cell phones at 2 mm from the body, mimicking a phone in the pocket, they measured SAR levels that exceeded the FCC's limit (215–217). Figure 3 presents the FCC's spreadsheet of its 17 body SAR measurements for 11 cell phones

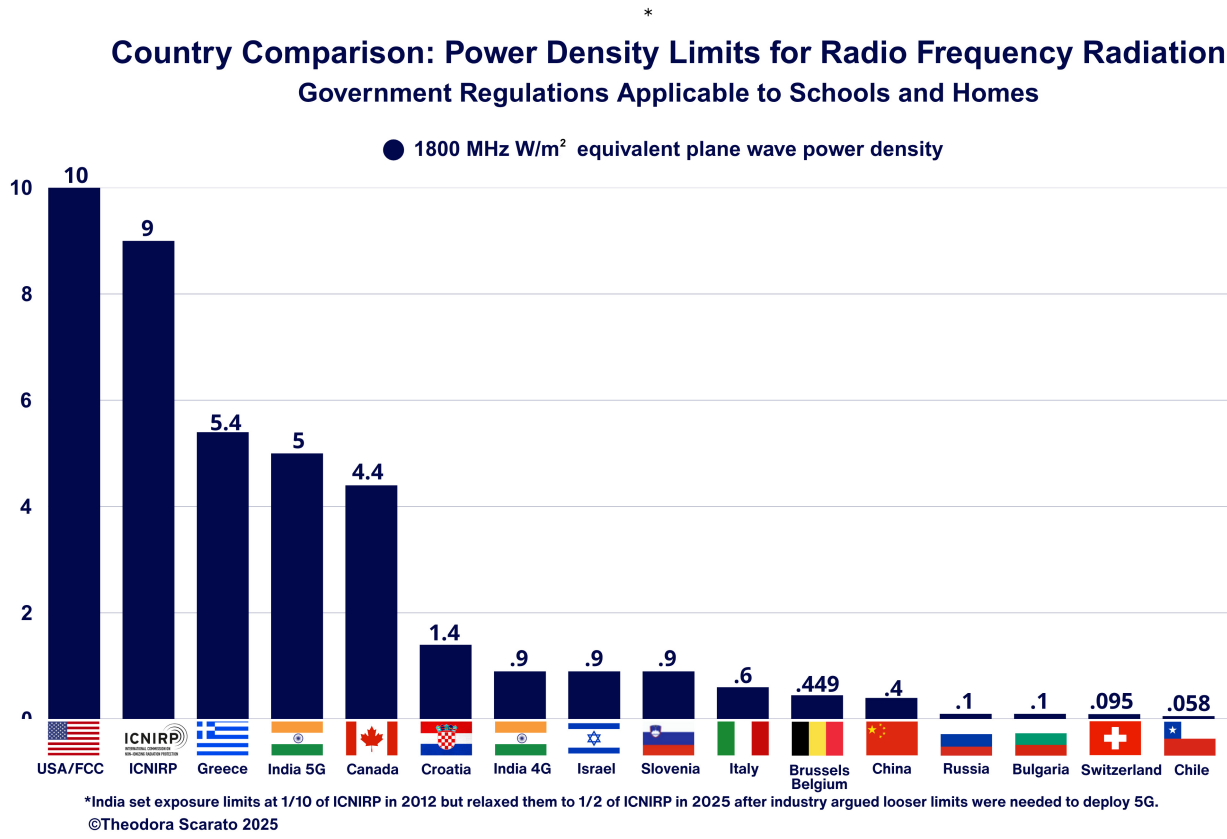

FIGURE 2
Comparing the U.S. to countries with more stringent RFR limits.

that the agency tested in the summer of 2019. Although the FCC's body SAR limit is 1.6 W/kg, 10 of the 17 FCC laboratory measurements exceeded this limit, one model by up to 325%.

If the FCC had tested the same phone models at 0 mm, mimicking direct body contact positions, the SAR levels likely would exceed FCC limits even more significantly, as conservative estimates indicate a 15% SAR increase for each mm of distance (213). The FCC FOIA data also highlights the variability in SAR measurements and +/−30% margin of error (or uncertainty factor) allowed by the FCC (218), as the same models had different SAR values depending on whether the phone was provided by the manufacturer or purchased by the FCC. Upon release of the records, FCC defended its decision not to take enforcement action, stating, "given that the RF exposure limit includes a significant safety margin, none of the results suggest there is any RF safety issue with the devices tested" (219). However, the released records also show that a few years prior, the FCC had forced a recall on an Andy 4G Smartphone model due to violations at 170 % of the SAR limit, a far lower exceedance than the 325% reported in the FCC's 2 mm tests (217).

The FCC's lack of transparency regarding these findings had multiple impacts. The FCC did not disclose its 2 mm SAR measurements in its statements filed in two legal cases that centered on the issue, resulting in Telecom wins for both cases (220, 221). The FCC also did not submit its 2 mm data to its then-open inquiry regarding its rules and test procedures, and the agency maintained that changes to its test distances were "unnecessary" (172). However, the 2021 D.C. Circuit decision mandated that the FCC explain how these test procedures remain valid (165), and later that year the agency announced interim guidance with a transition period tightening the minimum distance from 25 mm to 5 mm (222). This change would bring the allowed test distance in line with the European Union, which already moved to 5 mm in 2016 (223, 224). However, as of this drafting of this paper, the guidance has yet to be finalized, and manufacturers can still choose a larger test distance. Further, a 5 mm distance still does not reflect today's real-world body contact usage, and phones that test compliant at 5 mm can still exceed limits in 0 mm body contact positions (213, 225).

No robust post-market surveillance, measurement, and compliance enforcement

The FCC does not have a robust post-market surveillance, oversight, and enforcement program for compliance with its FCC's regulations. This author's FOIA requests revealed the FCC has performed minimal post-market surveillance to ensure cell phones are compliant with its limits, with only 5 devices SAR tested from 2020 to November 2024 (226). In contrast, France has conducted

TABLE 4 Examples of international policies on wireless radiation to mitigate risk and ensure compliance.*

Action, law, policy or directive	Country examples
Public health recommendations	
Health agency public health advice that people should reduce exposure to cell phone RF radiation, especially for children.	United Kingdom, Russia, Switzerland, Finland, Ireland, Germany, Belgium, Greece, Israel, Turkey, Singapore, France, Denmark, India, Austria, Cyprus, Canada, Italy, French Polynesia, Republic of Korea, Sri Lanka, Croatia, Ivory Coast, European Parliament Resolution 1815
Public education campaign and/or a website that recommends and informs people how to reduce exposure.	France, French Polynesia, Israel, Italy, Cyprus, Tunisia, Switzerland, Belgium, Republic of Korea, Ivory Coast
Public health guidance to prefer wired over Wi-Fi in kindergartens and schools.	France, Israel, French Polynesia, Russia, Cyprus
Laws or policies to reduce exposures	
More stringent limits for environmental exposures from cell towers and wireless networks and/or policies to reduce levels below ICNIRP/FCC limits due to either a lower national limit or additional measures in "sensitive areas" (e.g., schools, daycare centers and hospitals).	Italy, India, Israel, Chile, Croatia, Ukraine, Kuwait, Greece, China, Russia, Canada, Switzerland, Belgium, Bosnia Herzegovina, Grand Duchy of Luxembourg, Greece, Belarus, Georgia, Serbia, Slovenia, Montenegro, Croatia, Bulgaria, Turkey Liechtenstein, Tajikistan, Kazakhstan, Uzbekistan, Kyrgyzstan, Moldova, Kuwait, Republic of Moldova, Iraq
Advertising mobile (cell) phones to young children prohibited	France, Belgium, French Polynesia
Sale of phones designed for young children prohibited	Belgium, France, French Polynesia (Minister of Health is authorized to ban)
Wi-Fi prohibited in daycares and kindergarten	France, Israel, French Polynesia (unless for specific activity), Cyprus (Directive)
Wi-Fi off or minimized in elementary classrooms	France, Israel, Cyprus (Directive)
Monitoring and measuring programs	
Measurement program to monitor nationwide environmental levels from cellular networks and ensure compliance.	France, Greece, Turkey, Romania, Serbia, India, Israel, French Polynesia, Croatia, Bulgaria, Tunisia, Malta, Brazil, Bahrain, Monaco, Bhutan, Senegal, United Kingdom, Australia, Spain, Austria, India, Israel, Gibraltar, Brussels Belgium, Switzerland, Norway, Lithuania
Post market surveillance program tests cell phones for SAR compliance.	France, Canada
Transparency measures	
Required labeling of cell phone radiation SAR levels on product packaging and/or point of sale.	France, Israel, India, Belgium, Russia, Republic of Korea, China
RF-EMF environmental level measurements from cell towers and base stations are publicly shared.	France, Greece, United Kingdom, Australia, Austria, Gibraltar, Belgium, Switzerland, Tunisia, Bahrain, Monaco, Senegal, Spain, Israel, Malta, Brazil

*This list is not based on a systematic review, and additional countries may also have relevant policies not included in this table.

robust post-market testing since 2012, evaluating hundreds of phones for RFR compliance (213) and triggering recalls or software updates for over 60 devices found to exceed EU limits (227). Some phone models that they tested at body contact reported SAR levels up to three times the EU limit, equivalent to up to 11 times the U.S. FCC's limit (213).

The case of the Apple iPhone 12

In 2023, France temporarily suspended sales of the iPhone 12 (model A2403) after its surveillance found SAR levels of 5.75 W/kg exceeding EU safety limits when tested in "on-body" scenarios mimicking a phone held in hand or carried in a pants pocket. Soon afterwards, Apple issued a software correction for the model to reduce radiation emissions, but only for the iPhone 12s in France. In 2025, 2 years later, a European Commission ruling then forced Apple to update the models EU-wide (228). The organization Phonegate Alert filed a legal complaint against the French government for failing to promptly inform the EU member states of the findings calling the two-year delay "unacceptable" and requesting corrective measures to be adopted "without delay" (229).

FOIA records released in 2024 document that the FCC had initiated its own iPhone 12 SAR tests when France first suspended sales in 2023, but technical problems delayed the process for months (230). However, the FCC has not released records of the measurements, nor is it known if Apple updated its U.S. models to reduce RFR emissions.

Cell tower and base station compliance issues

The compliance oversight regulatory gap also extends to wireless infrastructure such as cell towers and 4G/5G small cells, as the US operates on what is essentially the honor system. FCC does not regularly audit base station network antenna emissions, conduct surprise inspections, or review compliance reports. There is no federal requirement for annual or periodic post-installation testing. Wireless providers often submit self-funded engineering simulations, rather than real-world measurements, as proof of compliance. RFR compliance reports lack standardized formats, consistent measurement protocols, and clearly stated enforcement

TABLE 5 Selected critiques of SAR metric and SAR/SAM test regarding adequacy for health protection.

Element	Practice/procedure	Critique
SAR limit	Limit is based on heating impacts.	Studies used to identify heat threshold for limit are animal studies from early 80s and 70s with small sample sizes and under 50-min exposures (10). Limit is not based on biological impacts from non-heating intensities or chronic exposure.
SAR "safety" margin	FCC claims a large safety factor exists.	The reductions were only applied to the heat-based threshold. Arbitrarily selected uncertainty/safety factors are inadequate for public health protection and are not consistent with the approaches used by public health agencies (10).
SAR measurement of rate	SAR does not measure total dose.	SAR values are a measurement of the rate of energy absorption per a specified mass of tissue. SAR values do not reflect the total absorbed dose or cumulative exposure, unlike the metrics used in ionizing radiation limits (201). Thus, exposure is allowed to continue indefinitely so long as the rate remains within SAR limits, omitting consideration of total dose over time.
SAR averaging	SAR rate is calculated by averaging over tissue.	Averaging measurements over a volume of tissue (1 or 10 grams) obscures peak levels absorbed by specific tissues/organs (129, 130).
SAR test phantom	SAR tests use a 220-pound adult male SAM body phantom.	SAM does not ensure conservative evaluation of all users/bystanders' exposures (19, 69, 202, 203). Engineering studies have also demonstrated that children's thinner skulls, distinctive physiologies, and more conductive brain tissue result in significantly higher RFR absorption rates, especially in brain regions critical for memory and learning, such as the cerebellum and hippocampus (68–70).
SAR test phantom materials	SAM phantoms are a plastic shell filled with homogenous liquid of salt, sugar and surfactants.	Human brain and body tissue is not homogenous. The continued sole use of SAM, when more precise methods are available, ignores the complexity of human tissue as well as the unique anatomical characteristics of children and the developing fetus, disregarding the increased sensitivity of their rapidly developing brains (19, 40, 68–70).
Body SAR test usage positions	Rules allows separation distance between the phone and body.	FCC's authorized test positions do not reflect today's real-world usage scenarios. Although people use phones tucked in tight pockets or pressed against their chest and abdomen, manufacturers have long been allowed to use a separation distance, from 5 to 25 mm for body SAR compliance tests.
SAR test set up	SAR tests only one device at a time.	People are exposed to numerous devices and networks all at once (from cell phones to Wi-Fi routers/printers, wireless wearables, "smart" devices, cell towers, small cells, etc.), which can increase their total exposure (204–206). Premarket tests do not account for total real-world combined overlapping exposure.
SAR test environment	Laboratory tests omit real world parameters.	Various parameters omitted from FCC authorized tests can impact a person's exposure. For example, metal inside (implants), on (jewelry/piercings) or near the body (usage in trains, cars etc.) can significantly increase exposure (207–212).

requirements. Many landlords, as well as local and state agencies, assume safety is assured, unaware that there is no oversight to verify compliance or to ensure that recommended compliance measures are implemented.

Exceedances for base station antennas have been documented, especially for building-mounted antennas. As an example, a 2021 measurement study of a rooftop lounge area using professional-grade spectrum management tools documented RFR spikes up to 264% of FCC limits in a Crest Factor analysis (231). A 2014 Wall Street Journal investigation reported on RFR audits that found one in ten rooftop cell sites assessed violated FCC limits (232).

No EMF measuring or monitoring program

The U.S. no longer has a program to measure and monitor EMF levels, as the last federal report on the issue is an EPA report dated 1986 (233). Independent publications have documented increases since then. A 2018 multi-country study reported RFR levels in Los Angeles at 70 times higher than estimates in the 1985 report (234). A 2021 assessment in Pennsylvania concluded power densities produced by the 5G/4G LTE antennas are 10 to 100 times higher than older networks (235), and hotspots have been documented on the street close to "small cell" antennas in South Carolina (236).

In contrast, several other countries conduct real-time, 24/7 monitoring and/or publish antenna locations/measurements from their audits/spot checks, and many provide the information online on publicly accessible, easy-to-navigate maps. Frances' map presents RFR levels color-coded by intensity and even shows transmitter directions (237). India states it audits up to 10% of sites annually, publicly posting all results, and penalizing providers that exceed limits (238). Greece has a continuous measurement program via 500 sensors located across the mainland and islands, with data posted in an online map (239).

Importantly, such government compliance programs have faced significant criticism regarding rigor and methodology (240). The levels are averaged, omitting peak intensities. Analyses have found that reliance on the posted field measurements and theoretical calculations can underestimate exposure because they often exclude numerous frequency bands (such as from Wi-Fi, GPS, satellites, radar and military applications), and long-term monitoring indicates that the short-term spot measurements are too brief to fully capture the variability of EMF exposure over time (240). Inclement weather, for instance, can boost signal strength, and levels can peak at various times throughout the day. Most importantly, the campaigns generally conclude compliance with ICNIRP-based limits, which is then interpreted as proof of safety, despite the lack of protection for long-term effects (240).

Despite the criticisms, these platforms nonetheless still represent an attempt to measure environmental levels and transparently inform the public, something the U.S. government has failed to do. Regular and continuous environmental monitoring, ensuring assessment of an individual's total dose from all sources, record keeping, and making the data available to

FCC SAR Tests of Selected Cell Phones at 2mm Distance to Body

Screensave from Internal Documents Released Under FOIA by FCC: FOIA Control Nos. 2023-000281 and 2023-000325

CONFIDENTIAL *FCC INTERNAL ONLY*

*NOTE: THE FOLLOWING RESULTS ARE FROM SAR TESTS AT A SEPARATION DISTANCE NOT IN ACCORDANCE WITH FCC GUIDANCE

FCC ID	Manufacturer	Description	Sample Type	SAR Configuration	FCC Lab Measured SAR Value (W/kg)	Serial Number
BCG-E3091A	Apple	iPhone 7 Portable Handset	Provided by Manufacturer	WCDMA Band 4, RMC, 12.2 kbps, Ch 1513, Body, Bottom, 2 mm	1.440	C6K6HD69HG7N
BCG-E3161A	Apple	iPhone X Portable Handset	Provided by Manufacturer	WCDMA Band 2, RMC, 12.2 kbps, Ch 9262, Body, Bottom, 2 mm	1.350	C39VF007JH2Q
				GPRS 1900, GMSK, 2 Tx Slots, Ch 512, Body, Bottom, 2 mm	0.727	
BCG-E3218A	Apple	iPhone XS Portable Handset	Purchased by FCC	GPRS 1900, GMSK, 2 Tx Slots, Ch 661, Body, Back, 2 mm	2.340	GONZ50M7KPFR
				GPRS 1900, GMSK, 2 Tx Slots, Ch 661, Body, Bottom, 2 mm	1.990	
A3LSMG960U	Samsung	Galaxy S9 Portable Handset	Provided by Manufacturer	CDMA BC1, RC3, TDSO 32, Ch 600, Body, Back, 2 mm, Connect then Postion	4.520	R38K609SMYL
				CDMA BC1, RC3, TDSO 32, Ch 600, Body, Back, 2 mm, Position then Connect	4.380	
A3LSMG960U	Samsung	Galaxy S9 Portable Handset	Purchased by FCC	CDMA BC1, RC3, TDSO 32, Ch 600, Body, Back, 2 mm, Connect then Postion	No Data Yet	R3M706TT9A
				CDMA BC1, RC3, TDSO 32, Ch 600, Body, Back, 2 mm, Position then Connect	No Data Yet	
A3LSMJ337A	Samsung	Galaxy J3 Portable Handset	Provided by Manufacturer	WCDMA Band 4, RMC, 12.2 kbps, Ch 1312, Body, Back, 2 mm, Connect then Position	5.200	RF8KA1J3X6E
				WCDMA Band 4, RMC, 12.2 kbps, Ch 1312, Body, Back, 2 mm, Position then Connect	5.140	
IHDT56XC4	Motorola	Moto e5 play Portable Handset	Provided by Manufacturer	WCDMA Band 2, RMC, 12.2 kbps, Ch 9262, Body, Back, 2 mm, Connect then Position	1.390	359524090350295
				WCDMA Band 2, RMC, 12.2 kbps, Ch 9262, Body, Back, 2 mm, Position then Connect	1.360	
IHDT56XB1	Motorola	Moto g6 Play Portable Handset	Provided by Manufacturer	WCDMA Band 5, RMC, 12.2 kbps, Ch 4132, Body, Front, 2 mm, Connect then Position	1.980	351864090034178
				WCDMA Band 5, RMC, 12.2 kbps, Ch 4132, Body, Front, 2 mm, Position then Connect	1.980	
IHDT56XB1	Motorola	Moto g6 Play Portable Handset	Purchased by FCC	WCDMA Band 5, RMC, 12.2 kbps, Ch 4132, Body, Front, 2 mm, Connect then Position	1.080	351864090300620
				WCDMA Band 5, RMC, 12.2 kbps, Ch 4132, Body, Front, 2 mm, Position then Connect	1.090	
YHLBLUVIVO5MN	BLU	Vivo 5 Mini Portable Handset	Provided by Manufacturer	GPRS 850, GMSK, 4 Tx Slots, Ch 128, Body, Back, 2 mm	2.200	1080021018057240
YHLBLUVIVO5MN	BLU	Vivo 5 Mini Portable Handset	Purchased by FCC	GPRS 850, GMSK, 4 Tx Slots, Ch 128, Body, Back, 2 mm	2.750	1080021018069900

FIGURE 3
FCC SAR tests at 2 mm distance find SAR values that exceed FCC's limit. Figure from U.S. government document in the public domain (217).

the public should be standard practice for non-ionizing EMF as a widespread environmental exposure.

A lack of public information and consumer awareness

Compounding the U.S. regulatory gaps regarding compliance, enforcement, and monitoring is a striking lack of transparency. Residents often become aware of new wireless infrastructure installations (e.g., 5G small cells and cell towers) only after the facilities have been approved, excluding communities from the decision-making process. While some localities will post locations of wireless facilities online, many do not. There is no federal public registry of all wireless antenna locations along with RFR compliance reports. Thus, the public is not informed of where network antennas are transmitting and what the expected or measured levels are. Public records requests for information are frequently met with delays, denials, or technical documents that the public cannot easily understand. There is also no database of RFR exposure-related complaints submitted to the FCC, nor the FCC's response.

Regarding personal devices, most consumers are unaware that their phones emit RFR and that manufacturer instructions, as detailed in Table 6, state that devices should be used at a specific distance away from the body to comply with FCC limits.

Local and state efforts to inform the public have been halted. Maine's "The Wireless Information Act," which required RFR statements on cell phone packaging, initially passed the State House and Senate in 2014, but failed to pass the routine implementation vote after lobbyists convinced lawmakers to switch their votes (248). The San Francisco and Berkeley unanimously passed *Cell Phone Right to Know* ordinances to inform consumers about RFR at the point of sale were halted by industry lawsuits, which argued that such initiatives violated corporate free speech rights (249–251).

Despite numerous requests that the FCC more transparently inform consumers in its 2013–2019 Inquiry, the FCC concluded that existing information "allows users to make informed decisions" (172). The FCC also submitted a statement in the Berkeley legal proceedings stating that the ordinance was federally preempted and "the information provided on its website and in cell phone user manuals is sufficient to inform consumers about the risk of RF exposure, and that additional notices risk "overwarning" and misleading consumers into believing that RF emissions from FCC-certified cell phones are unsafe" (221). As noted earlier, the FCC did not include its findings that SAR limits were exceeded at 2 mm to the Berkeley filing. Without knowledge of RFR, most people routinely carry phones in pockets or against their bodies, unknowingly allowing exposures that could exceed government regulations (213, 214).

No robust RFR or non-ionizing EMF protection program for workers

The U.S. does not have a coordinated, comprehensive federal program addressing non-ionizing EMF safety in civilian workplaces. OSHA's comments to the FCC stated, "RF emissions are not on OSHA's active regulatory agenda, so we have not conducted a comprehensive literature review or risk assessment on RF hazards" (168).

Decades ago, both the National Institute for Occupational Safety and Health (NIOSH) and the Occupational Safety and Health Administration (OSHA) had active EMF research programs and expertise. In 1995, Robert A. Curtis, then Director of the U.S. Department of Labor OSHA Health Response Team, recommended a Comprehensive RF Protection Program with "…traditional safety and health program elements including training, medical monitoring, protective procedures and engineering controls, signs, hazard assessments, employee

TABLE 6 Manufacturer's instructions for cell phone and wireless devices.

Brand	Model	RFR exposure statement
Apple	16	"iPhone is evaluated in positions that simulate uses against the head, with no separation, and when worn or carried against the torso of the body, with 5 mm separation" (241).
Samsung	Galaxy Z Fold 3 5G	"Body-worn SAR testing has been carried out at a separation distance of 1.5 cm. To meet RF exposure guidelines during body-worn operation, the device should be positioned at least this distance away from the body" (242).
LG	G8	"Body-worn Operation: This device was tested for typical use with the back of the device kept 0.39 inches (1.0 cm) from the body. To comply with FCC RF exposure requirements, a minimum separation distance of 0.39 inches (1.0 cm) must be maintained between the user's body and the back of the device" (243)
Google	Pixel 9 Pro XL	"In the countries where the Specific Absorption Rate (SAR) limit is 1.6 W/kg averaged over one gram of tissue, the highest SAR values for this device type are 0.92 W/kg when used against head with no separation and 0.99 W/kg against body with 1.0 cm (0.4 in) separation…Keep the device away from your body to meet the distance requirement" (244).
Amazon	Echo Smart Speaker	"This device should be installed and operated with a minimum distance of 20 cm between the radiator and your body" (245).
Samsung	HP Printer M301 Series	"While installing and operating this transmitter and antenna combination the radio frequency exposure limit of 1 m W/cm^2 may be exceeded at distances close to the antenna installed. Therefore, the user must maintain a minimum distance of 20 cm from the antenna at all times. This device cannot be collocated with another transmitter and transmitting antenna (246)."
Verizon	5G internet Gateway router	"To comply with FCC RF exposure compliance requirements, the antenna used for this transmitter must be installed to provide a separation distance of at least 20 cm from all persons (indoor), at least 54 cm from all persons (outdoor), and must not be co-located or operating in conjunction with any other antenna or transmitter (247)."

involvement, and designated responsibilities for program implementation" (252). It was never implemented.

NIOSH, whose experts previously recommended and developed precautionary measures to minimize EMF risk (253–256), never formally issued policies to employers nationwide nor did it issue a final report regarding its funded projects (2008–2014) to develop cost-effective methods to assess and manage workplace EMF exposure (256). No updates have been issued to its posted online resources, such as its 1996 *EMFs in the Workplace* factsheet (257).

There is a need to fully assess occupational exposures, especially with the evolution of modern technologies. Exposures could be exceeded in occupational settings involving dielectric heating of plastics, security, cosmetics and telecommunications and further research is needed to address 5G, and wireless power transfer (258, 259). Routine compliance checks are not required for building-mounted antennas despite maintenance workers, such as HVAC technicians and window washers, facing heightened exposure when working on rooftops and buildings. While OSHA can cite both employers and landlords, federal and state agencies lack active engagement in educating employers and workers about non-ionizing radiation exposure, leaving many workers unaware of potential risks or how to report them.

Accountability for cell tower climbers, referred to as "the most dangerous job in America," (260) remains diffuse, fragmented, and often unclear, especially because subcontracting is widespread and infrastructure is being built at a rapid pace. Although OSHA and the FCC have initiated activities to address these issues, preventable accidents continue to occur (261), and RFR is not a part of the conversation. A 2020 case report describes how a telecom engineer who was accidentally overexposed, seven years later developed demyelinating brain lesions and kidney and lung masses, which they believe were a delayed RFR injury, mimicking Multiple Sclerosis (MS) (262).

While the U.S. never implemented a federal program, the IEEE EME Safety Program (C95.7-2022) provides several key elements to assess, manage, and mitigate risk applicable to the workplace (263); however, elements are not required in most U.S. workplaces. In contrast, the European Union issued a 2013 Directive to member states on health and safety requirements regarding EMF exposure to workers, along with an implementation guide (264, 265). Although the Directive does not address long-term effects, it does include risk assessments and preventive measures, with special considerations for pregnant workers and those with medical implants.

Equally important is the need to re-evaluate FCC regulations regarding the separation of human exposure limits into occupational/controlled and general population/uncontrolled exposures. According to the FCC, the "Occupational" limit was designed to allow more exposure because a worker is trained on the issue, aware of their exposure, and able to exercise control over it. The "general public" applies to everyone else, regardless of all ages and health statuses, who are not aware of their exposure, and therefore less likely to control exposures. The assumption that a worker should be allowed to be exposed to higher RFR levels just because they are trained warrants an evidence-based re-evaluation. Since 1996, there has been a substantial increase in wireless infrastructure, impacting a worker's ability, no matter how trained, to control their exposure. Telecommunication technicians/tower climbers report that even though they verify that transmitters are powered down at a facility, they are working on, they can still be exposed to RFR antennas on nearby buildings, and sometimes transmitters are accidentally powered *back on* (266). From a logical standpoint, one could argue that workers should have *more* stringent exposure limits given their more prolonged exposures. Yet without active agency research, such questions are not being investigated in the U.S.

Workers in nearly all of today's modern jobs, such as those in emergency response, education, healthcare, retail, and service sectors, are exposed to chronic low-level RF radiation from wireless devices, including cell phones, headsets, walkie-talkies, Wi-Fi access, computers, boosters, and other wireless equipment. These exposures are not assessed or mitigated, and workers are largely unaware of the exposure.

No consideration for environmental impacts

U.S. regulations ignore wildlife as they were designed only for humans. Studies have observed that wireless radiation and non-ionizing EMFs can adversely affect wildlife, particularly insects, and impact plant health, yet no U.S. regulations currently exist to safeguard ecosystems from these exposures (185, 267–271). Levitt et al. (2, 185, 186) reports a broad range of impacts and the need to update policy in their three-part review of impacts to flora and fauna, "Numerous studies across all frequencies and taxa indicate that current low-level anthropogenic EMF can have myriad adverse and synergistic effects, including on orientation and migration, food finding, reproduction, mating, nest and den building, territorial maintenance and defense, and on vitality, longevity and survivorship itself. Effects have been observed in mammals such as bats, cervids, cetaceans, and pinnipeds among others, and on birds, insects, amphibians, reptiles, microbes and many species of flora" [(185), abstract].

Compliance test procedures ignore the airspace near antennas where flora and fauna live, e.g., birds and insects fly/nest/perch, or bats fly/feed, and trees grow. RFR levels close to antennas can exceed regulatory limits past 50 feet or far more, but facilities are generally deemed compliant because compliance tests only measure ground-level RFR or where people exist. While experts in wildlife and bioelectromagnetics are calling for safeguards (15, 186, 269, 271) and the European Union is funding research (123, 126), the U.S has never evaluated the impact of wireless densification on flora and fauna.

Additionally, former FCC attorney Erica Rosenberg, who served as Assistant Chief of the Competition and Infrastructure Policy Division at the agency, detailed the way the FCC's approach has systematically failed to fulfill its duties under the National Environmental Policy Act (NEPA) in "multiple and significant ways" (272). She details how the FCC's inadequate procedures have allowed most wireless infrastructure, including cell towers, small cells, and satellite networks, to be categorically excluded from meaningful environmental assessment how the FCC delegates much of the environmental review process to industry itself, with little oversight or tracking, stating the agency "fails to vigorously enforce its rules so that industry noncompliance is rampant" [(272), p. 26].

Risk mitigation measures and safeguards for the vulnerable

As detailed in the European Environment Agency's *Late Lessons from Early Warnings,* proving harm from corporate pollution can take decades (273), and the cost of waiting can have serious health implications. Roda and Perry considered the growing scientific literature in 2014 and concluded that, despite the incomplete state of scientific knowledge, a precautionary approach regarding base stations near children was aligned with European states' obligations under international human rights law (274). As detailed in Table 4, several countries have implemented policies to mitigate risk to children, regardless of whether health effects were considered proven/established or not. Belgium, like France, banned the sale of cell phones designed for young children, concluding that precaution was needed after the WHO/IARC 2011 classification (275).

Schools are a critical area for risk mitigation measures. France, Israel, Cyprus, and French Polynesia reduce Wi-Fi exposure in young children's classrooms, and numerous countries have banned cell towers on school property (19, 276). Cellular antennas installed near schools can increase the environmental exposures in classrooms (277, 278), and closer proximity to network antennas are associated with cancer, radiofrequency sickness, and altered biochemical markers (22, 279, 280). But while several local U.S. school boards have cell tower bans, there is no U.S. federal policy or guidance. In many economically disadvantaged communities, cell towers are proposed as an ideal way to address financial challenges, and parents have fewer resources to stop such installations.

Numerous international governments also have issued recommendations that parents "should" reduce children's exposure, explicitly stating that children could be vulnerable to effects (19, 179). Although the American Academy of Pediatrics, Santa Clara California Medical Association and Maryland State Council on Children's Environmental Health Protection have issued recommendations for families and schools on how to reduce cell phone radiation exposure (19, 281, 282), U.S. public health agency websites lack clear, straightforward advice and have, in the case of the CDC, even removed mention of the unique vulnerabilities of children (283, 284). The CDC, which previously drafted (284–286) and more recently funded, the development of website content on wireless with industry-tied experts (287, 288), only offers two tips "if you are worried" to reduce RFR exposure (289). The FDA's children and cellphone webpage has an image of a smiling teenager looking at his phone and states, "current scientific evidence does not show a danger to any users of cell phones from radio frequency (RF) energy, including children and teenagers" and offers 4 simple steps "that anyone, including children and teenagers, can take…" omitting information on children's unique vulnerability to environmental exposures (290).

Federal policies must also be strengthened to support people reporting symptoms from exposure (known as electromagnetic hypersensitivity, electromagnetic syndrome or microwave sickness) (3, 187, 280, 291) so that they are properly accommodated under the ADA, and that outdated FCC rules do not override civil rights protections.

Proposals to address regulatory gaps

In 2012, federal legislation in *The Cell Phone Right To Know Act* HR 6358, was proposed to address several of the above detailed regulatory gaps (292). It would have increased federal research grants for bioeffect research, directed the EPA to develop science-based exposure standards, directed the FDA to promulgate RFR labeling at the point of sale and online, and amended the 1934 Communications Act to exclude a prohibition on state or local government zoning regulation of personal wireless service facilities based on health effects. However, despite strong support by the largest group of children's doctors in the U.S., the American

TABLE 7 Recommendations of the New Hampshire State Commission 2020 Final Report on Health and Environmental Impacts of 5G and Evolving Technology (113).

Issue	Majority report recommendations
Scientific research	- Send a resolution to the U.S. Congress to require the FCC to commission an independent health study and review of RFR safety limits. - Establish new measurement protocols to evaluate high data rate, signal characteristics associated with biological effects and summative effects of multiple radiation sources. - Promote basic science and clinical research on electromagnetic hypersensitivity and biological effects, ensuring ADA protections are considered.
Environment protection	- Engage agencies with ecological knowledge to develop RF-radiation safety limits that will protect the trees, plants, birds, insects and pollinators. - Require the FCC, under the National Environmental Policy Act, to do an environmental impact statement as to the effect on New Hampshire and the country from 5G and the expansion of RFR wireless technologies.
Measurements	- Measure RFR intensities systematically throughout the state and develop a publicly accessible map to present the information. - Conduct RFR signal strength measurements for cell sites by independent contractors. - Include RFR measurement training for home inspectors in the Office of Professional Licensure and Certification.
Risk mitigation	- Require setbacks of 1,640 feet for new wireless antennas from residences, businesses and schools. - Equip cell phones and wireless devices with updated software that stops cell phones from radiating when positioned against the body. - Replace Wi-Fi with RFR free internet connections in schools and libraries. - Establish RFR free zones in commercial and public buildings, especially healthcare facilities. - Support statewide deployment of fiber optic cable connectivity with wired connections inside homes.
Awareness and education	- Educate the public on minimizing RFR exposure with multimedia public service announcements on radio, television and print. - Post warning signs in commercial and public buildings. - Label all poles or structures holding 5G antennas in public rights-of-way with RFR warning signs readable from nine feet away.

Academy of Pediatrics, the comprehensive legislation failed to make it to a vote (293).

In 2020, a New Hampshire State Commission created by legislation issued a Report on "The Environmental and Health Effects of Evolving 5G Technology" with 15 recommendations summarized in Table 7 to "protect people, wildlife, and the environment from harmful levels of radiation" after a year-long investigation into the subject (113). Numerous scientists provided testimony, and the Commission sent inquiries to federal agencies. The FCC did not respond, and letters from the FDA and NCI revealed their absence of a comprehensive scientific review (294).

Is there evidence of regulatory capture?

There is evidence of a decades-long industry regulatory capture of key U.S agencies, particularly the FCC. As Seymour and Seymour stated in 2013, "This failure to update safety standards in the face of increasing scientific evidence of biological harm to humans and wildlife is a graphic example of the corrupting effect of industry money on Congress, and a perfect example of why huge amounts of industry money compromises democracy" [(159), p. 175].

In 2015, Norm Alster, a journalist on a writing fellowship at the Edmond J. Safra Center for Ethics at Harvard University, published the report *Captured Agency, How the Federal Communications Commission Is Dominated by the Industries it Presumably Regulates*, detailing how the FCC operates under the "undue" influence of the wireless industry, enabled by a revolving door between FCC leadership and the wireless industry lobby and consulting law firms (295). In turn, he says, "the wireless industry has been allowed to grow unchecked and virtually unregulated, with fundamental questions on public health impact routinely ignored" [(295), p. 5]. At that time, Tom Wheeler, former CEO of the Cellular Telecommunications and Industry Association (CTIA), an industry trade group, had become the Chair of the FCC. Like the industry-tied leadership before and after him, Wheeler pursued an aggressive deregulatory agenda, opening up millimeter wave spectrum, stating that American leadership in 5G must be a national priority (296). As Table 8 illustrates, this dynamic remains firmly in place today.

Former FCC Chair Ajit Pai was recently appointed to lead the CTIA, succeeding Meredith Attwell Baker, also a former FCC Commissioner. During his tenure at the FCC, Pai passed sweeping fast-tracking rules that stripped local authority regarding 5G and wireless infrastructure (297). As of this writing, the current FCC Chair is Brendan Carr, an attorney who previously represented telecommunications companies, including the CTIA, in its legal challenge against San Francisco's cell phone right-to-know ordinance (298). Before he was appointed FCC Chair, Carr co-authored a chapter in Heritage Foundation's Project 2025 that included telecommunications industry-friendly recommendations such as further streamlining the infrastructure permitting process, expediting satellite reviews, and limiting government fees (299). Under his leadership, the FCC has already approved measures to accelerate satellite licensing (300), and the agency is poised to act on more wireless streamlining proposals that would weaken environmental review processes and dismantle state and local authority regarding cell towers (301).

To fully understand the close ties between federal regulators and the telecommunications industry, it is critical to also examine the evolution of law firms that consult for the industry. In 1974, President Richard Nixon appointed Richard E. Wiley as FCC Chairman. After leaving the FCC, Wiley co-founded a Washington, D.C. law firm now known as Wiley Rein LLP. The New York Times profiled Wiley in 1992 as a man of significant influence (303) and the Los Angeles Times in 2001 dubbed Wiley the unofficial FCC sixth commissioner (304) due to his impressive impact on telecommunications policy. Wiley Rein LLP, along with the law firm of Gibson, Dunn & Crutcher, represented industry clients, including CTIA—The Wireless Association, in their litigation opposing San Francisco and Berkeley's cell phone right-to-know ordinances (305–307) and they have employed many FCC Commissioners and lawyers as detailed in Table 8.

As an example of the revolving door beyond the Commissioners, Thomas M. Johnson Jr., worked at Gibson

TABLE 8 The revolving door between FCC commissioners and the telecommunication industry examples from 1996 to current.

Name	FCC position	Wireless industry tie/position
Brendan Carr	FCC Chair (2025 to present) FCC Commissioner (2017–2025)	Attorney, Wiley Rein LLP representing telecommunication companies (2005-2007, 2009–2012)
Ajit Pai	FCC Commissioner (2021–2025) FCC Chair (2017–2021) FCC Commissioner (2012–2017)	President/CEO of the CTIA (2025 to present) President, Searchlight Capital Partners which specializes in telecom investments (2021–2025) Verizon Associate General Counsel (2001–2003)
Anna M. Gomez	FCC Commissioner (2023–present)	Partner at Wiley Rein, Media & Technology Practice (2013–2022) Vice President State and Federal Regulatory, Government Affairs, Sprint Nextel 2006–2009
Nathan A. Simington	FCC Commissioner (2020–2025)	Senior Counsel at Brightstar "the #1 specialized wireless distributor in the world" (2017–2022)
Thomas Johnson	FCC General Counsel (2017–2021)	Partner & Co-Chair, Appellate Practice at Wiley Rein LLP (2021–present) Gibson, Dunn & Crutcher (2006–2016)
Bruce Romano	Associate Legal Chief at FCC's Office of Engineering and Technology (OET) (1978–2018 Media Bureau and OET)	Wiley Rein LLP where he assists clients in navigating FCC policies and procedures (302) (2018–at least 2024)
Tom Wheeler	FCC Chair (2013–2017)	President of Shiloh Group LLC, telecom sector investments and strategy (2017–present) President and CEO of the CTIA 1992–2004 President and CEO of the National Cable Television Association (NCTA) (1976–1984)
Meredith Attwell Baker	FCC Commissioner 2009–2011	President and CEO of the CTIA (2014–2015) Director of Congressional Affairs at the CTIA (1998–2000)
Robert M. McDowell	FCC Commissioner (2006–2013)	Partner in Wiley Rein Law firm, Telecom practice (2014–2016) Cooley LLP, now Chair of global communications (2016–present) Senior Vice President and Assistant General Counsel of the Competitive Telecommunications Association (1999–2006) VP & General Counsel America's Carriers Telecommunications Association (ACTA) 1998–1999
Julius Genachowski	FCC Chair (2009–2013) FCC Commissioner (2006–2009)	Partner & Managing Director in global technology, media, and telecom investments at the Carlyle Group (2014–2024) Senior advisor (2024 to present) Board of Directors Sonos Inc (2013–2023, President BOE 2023 to present) Board of Directors Sprint (2015–2020)
Jonathan S. Adelstein	FCC Commissioner (2002–2009)	President & CEO, PCIA, now the Wireless Infrastructure Association (2012–2022)
Kevin J. Martin	FCC Chair (2005–2009) FCC Commissioner (2001–2005)	Interim Head then VP, U.S. Public Policy, Meta/Facebook (2015–present) Partner, Squire Patton Boggs LLP, coleader of Telecom practice group (2009–2015) Partner at Wiley Rein in communications, legislative, and appellate litigation matters (1998–2001)
Kathleen Q. Abernathy	FCC Commissioner (2001–2005)	Board of Directors, DISH Network (2019–present) BAI Communications (2020–2024) Frontier Communication, Board of Directors (2006–2010) then Chief Legal Officer and Executive Vice President (2010–2016)
Michael K. Powell	FCC Chair (2001–2005) FCC Commissioner (1997–2001)	President and CEO of the NCTA (2011–2025 Retirement)
William E. Kennard	FCC Chair (1997–2001) FCC General Counsel (1993–1997)	AT&T Board Lead Independent Director (2025–present) AT&T Board Chair (2021–2025) AT&T Board (starting 2014)

Dunn before serving as FCC General Counsel. At the FCC, he was a counsel of record on the FCC's brief against EHT et al. and penned two pivotal FCC statements of interest siding with industry in both the Berkeley cellphone right-to-know case and other litigation centering on consumer awareness of cell phone radiation exposures (220, 221). He then left the FCC to work at Wiley Rein, co-authoring a memo for the CTIA opposing petitions in Massachusetts that would have required routine RFR audits for cell towers, RFR mitigation measures for devices, and educating schoolchildren (308). This revolving-door advocacy illustrates a key strategy detailed in Alster's *Captured Agency* report: the use of aggressive legal tactics by industry to suppress consumer safety initiatives and undermine local regulatory efforts (295).

Studies continue to find that industry-sponsored research is less likely to conclude adverse effects from non-ionizing EMF exposure, while independently funded studies more often report health effects (28, 309–315), mirroring historical patterns seen in other industries such as tobacco, lead, and chemicals (295, 316, 317). This, combined with heavy lobbying, political contributions, and well-funded public relations campaigns, maintains the inaccurate narrative of a scientific consensus on wireless safety (295, 318, 319). Thus, industry can pursue an unrestrained agenda to proliferate wireless networks, unchecked for safety.

What reforms are needed to address regulatory gaps?

The existing regulatory vacuum can be addressed by common-sense reforms to bring the U.S. regulatory framework into the 21st century so that it reflects current science, modern usage patterns, occupational exposures, and the realities of cumulative exposures from multiple wireless devices and technologies. Robust oversight and enforcement is critical, and updated policies should address both human and ecological health as they are inextricably intertwined. Recommendations to address regulatory deficiencies include:

Gap: A lack of agency activities investigating human health effects of wireless technology

Reform: Reinvigorate national research.

1. Reinstate a comprehensive national EMF bioeffects research program across key federal agencies with annual reporting.
2. Ensure a thorough ongoing review of the scientific evidence, paired with targeted research activities to address critical data gaps and evaluate industry involvement.
3. Reestablish an interagency group to coordinate among federal agencies.
4. Expand research to encompass all artificial non-ionizing frequencies, including powerlines, charging systems, wireless power transfer, LED systems, satellite systems, and mmWave -THz bands associated with emerging technologies.

Gap: Human exposure limits are only designed to protect against short-term heating related effects.

Reform: Revise limits with an evidence-based approach that protects for effects of non-heating and long-term effects.

1. Update exposure limits using quantitative risk assessments grounded in current scientific research to address adverse biological effects, including those from cumulative and long-term low-intensity exposures, applying an ecosystem-based approach.
2. Address signal characteristics (such as modulation) and exposure parameters (environment, metal, etc.) beyond frequency and intensity.
3. Apply safety margins sufficiently protective for children, different developmental and medical sensitivities, ensuring safety factors consistent with limit-setting practices used for toxic and carcinogenic exposures.
4. Conduct periodic, independent scientific reviews of regulations through a transparent science-based process led by public health and environmental agencies.

Gap: No data gathering on exposures or effects.

Reform: Establish national surveillance programs.

1. Measure and monitor EMF levels, prioritizing sensitive areas like schools and conservation areas, with publicly accessible data dashboard.
2. Establish a comprehensive post-market medical, health, and environmental surveillance and reporting program for consumer devices (phones, computers, etc.) and infrastructure (cell towers, 5G, etc.).

Gap: Premarket and post-market compliance processes lack oversight and do not reflect real-world usage patterns, conditions, or users.

Reform: Modernize oversight and compliance

1. Require rigorous premarket safety testing for all new wireless technologies, considering human and wildlife impacts.
2. Update cell phone and device compliance testing procedures to reflect real-world exposure, including direct contact use, multiple devices/networks functioning at once, and account for various environmental conditions.
3. Perform routine audits of emissions from networks and devices with enforcement measures.
4. Update and standardize RF compliance procedures and reporting for network infrastructure and develop oversight procedures to ensure recommended remediation is completed and that methodologies and measurement tools are empirically validated.

Gap: A lack of transparency regarding infrastructure/device emissions and agency activities

Reform: Ensure publicly accessible information

1. Develop a national registry and database of all existing and proposed wireless infrastructure installations (towers, 4G, 5G, etc.), including permitting and RF compliance data.
2. Launch an easy-to-use online website with mapping tools to host RF measurements and registry information.
3. Ensure RF complaints to the FCC and the agency's response are publicly available.
4. Update the FCC's authorization site platform so that the general public can more easily navigate RF data.

Gap: A lack of consumer awareness

Reform: Inform the public on exposures and measures to reduce exposure

1. Require RF and EMF exposure labeling on all wireless devices and electronics (including charging cables) along with clear instructions on mitigating exposure at the point of sale and packaging.
2. Provide robust public health agency guidance on minimizing exposure from all emitting devices, including cell phones, baby monitors, speakers, printers etc., as well as how to use safer alternatives such as Ethernet and corded connections rather than Wi-Fi and Bluetooth.

Gap: No safeguards to mitigate risk to children and vulnerable groups

Reform: Implement measures to reduce exposures in sensitive areas.

1. Prioritize wired networks, rather than wireless.
2. Issue robust guidance to institutions and local governments on reducing RF exposure for infrastructure and land use planning, as well as in building networks and devices.
3. Prohibit wireless infrastructure on or near schools, daycares, and critical wildlife habitats.
4. Mitigate day care and school exposures (e.g., replacing Wi-Fi with Ethernet and cell phones powered off)

5. Ensure accommodations are implemented in workplaces, educational institutions, public spaces, and residential areas as recommended by medical providers.

Gap: No oversight or research focused on occupational exposures.

Reform: Safeguard workers with a robust occupational RF/EMF protection program.

1. Establish a comprehensive occupational RF & EMF protection program.
2. Evaluate exposures in broad range of exposed occupations, from telecom, plastic industry, welding, utilities, healthcare, military, to retail and education.
3. Implement medical surveillance, cumulative exposure tracking, and reporting channels.
4. Provide robust employer/worker training.
5. Develop workplace-specific protocols regarding on-site measurements, cumulative exposure tracking, and required risk mitigation with enforcement mechanisms.
6. Include medical and pregnancy-specific protections such as modified duties, exposure minimization, and clear risk communication.
7. Ensure accommodations for the medically vulnerable and persons with implants.

Gap: A lack of safer technology consumer options and research

Reform: Support research, innovation, and safer alternatives.

1. Fund research on no/low EMF technology design.
2. Provide economic incentives for industry.
3. Ensure safer options are available to consumers. For example, require a plug-and-play option to connect devices with cables and Ethernet instead of wireless.
4. Require manufacturers and developers to show they have researched and integrated EMF reduction strategies in technologies brought to market and network deployment.
5. Consider a federal certificate program for no/low EMF technology and spaces.

Gap: Limits were not designed for flora or fauna

Reform: Develop a regulatory framework to protect wildlife and habitat.

1. Establish science-based, species-specific exposure limits to protect wildlife from chronic, low-level non-ionizing EMF.
2. Update compliance procedures to include flora and fauna exposure.
3. Update NEPA procedures with processes that ensure thorough evaluation of cumulative RF effects on ecosystems including vulnerable species like pollinators.
4. Designate low-to-no-EMF zones and setback requirements near conservation areas, migratory corridors, wetlands, and ecologically sensitive areas.
5. Measure and monitor EMF in parks, forests, and other ecologically sensitive zones.

This is a brief summary, as a more comprehensive review and recommendations on protecting wildlife is discussed in a related paper in this Frontiers on Public Health Special Edition, co-authored by TS (320).

Discussion and conclusion

What has emerged from this review is a profound failure of governance, with the U.S. as an exemplar of regulatory gaps. While wireless technologies are rapidly advancing to 5G and beyond, U.S. regulatory oversight has failed to keep pace. The current regulatory framework governing wireless technology in the U.S. is outdated, fragmented, and heavily influenced by industry. Assumptions that federal safety limits are current and science-based are inaccurate, as today's guidelines are based on decades-old research, obsolete/incomplete test methods, and a landscape marked by a near-total absence of civilian research, oversight, and enforcement activity (10). Given the ubiquity of wireless in modern workplaces, the lack of a comprehensive occupational RFR/EMF program, exposure research, and medical surveillance represents a serious gap. This issue should command newfound attention.

The existing research paralysis has led to significant regulatory deflection and abdication. Local and state officials defer to federal agencies. Federal agencies defer to one another. Yet, there has not been an evaluation of *all* the scientific evidence regarding the health effects of wireless technologies despite major technological changes and an ever-growing body of science. Agencies that policymakers expect to have studied the issue simply have not done so.

The result is that U.S. regulations exist without an up-to-date review. Exposure limits are based only on protecting short-term exposures, ignoring the realities of today's long-term cumulative exposure and complex modulations and signaling characteristics reported as important variables. Nothing has changed since 2002, when the EPA wrote that "…federal health and safety agencies have not yet developed policies concerning possible risk from long-term, non-thermal exposures" (321).

To rectify the current situation, government oversight must balance industry power. A strong regulatory framework must be built that rests on transparency and robust evidence-based evaluation, free of industry influence. Prevention is the cornerstone of public health, and the U.S. needs to move toward a risk mitigation approach.

Advancing regulatory reforms is not just a matter of good governance but an ethical imperative. The consequences of ignoring the growing science on non-thermal impacts could be severe, not only in for irreversible health impacts, but also for economic impacts, worker productivity, educational outcomes, and environmental damage. The U.S. should take a leadership role in technology safety by putting children, vulnerable groups, and environmental protection at the center of our decision-making process.

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Supplementary material

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Flora and fauna: how nonhuman species interact with natural and man-made EMF at ecosystem levels and public policy recommendations

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In the last 60 years, there has been a steady increase in ambient exposures from nonionizing electromagnetic fields (EMF) between 0 and 300 GHz, primarily in the radiofrequency (RF) ranges between 30 kHz and 3 GHz. Each technology has introduced a layer of exposures with different transmission characteristics into the environment, creating what is today a broad scope of complex chronic, low-intensity, ambient exposures known to be biologically active in human and nonhuman species alike. The next generation of broadband technology employs a wide span of simultaneous frequency exposures for pervasive civilian use with signaling characteristics heretofore never deployed. Fifth and sixth generation (5G, 6G) networks utilize significantly higher areas of the electromagnetic spectrum >3.5 GHz unlike previous wireless technologies. The scale at which this EMF deployment unfolded has now reached documented proportions that simply do not exist in nature, creating 24/7 exposures to a novel energetic form of air pollution. While there are extensive local variations in exposure intensities, e.g., rural versus urban environments with proximity to transmission sources being the controlling variable, the advent of significantly increased satellites in low earth orbits, disseminating radiofrequency EMF (RF-EMF) toward Earth in broad radiation patterns, has now all but erased such demographic distinctions. Nowhere on Earth today is completely RF-EMF free. Nonhuman species are highly sensitive to the Earth's geomagnetic fields which are used for orientation, migration, mating, food finding, territorial defense, and all of life's activities. Compared to human abilities, myriad species have evolved an exceptionally sensitive physical array of electro/magneto-receptors with which to perceive environmental EMF often at, or very near, natural geomagnetic fields. Today's exposures are capable, even at very low intensities, of disrupting critical fauna/flora functions. Any existing exposure standards are strictly for humans. Discussed are nonhuman unique physiologies and potential resonant matches at ambient levels today. Policy recommendations for wildlife protection includes discussion of "airspace as habitat," adherence to existing laws, and mitigation that could include frequency re-allocation, redesign of hardware and network engineering, and societies moving away from certain competitive economic models, as well as EMF-free zones during migration and breeding seasons where possible.

KEYWORDS

electromagnetic fields, radiofrequency radiation, wildlife, nonhuman species, low-intensity effects, airspace-as-habitat, aeroecology, National Environmental Policy Act

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Part 1. Introduction: historical background

The extraordinary perceptual abilities of some nonhuman species—e.g., avian, insect, and cetacean abilities to migrate thousands of miles; mammalian and reptile species' ability to predict coming storms and earthquakes days/weeks in advance; and nocturnal species' keen vision and resourceful predation abilities among many others—have long fascinated humans and researchers alike. Early humans attributed these abilities to mystical powers. We now know much more about highly sensitive electromagnetic perception mechanisms (1) controlling these abilities in both fauna and flora and to many it is no less wondrous. It also, however, makes many species highly vulnerable to the predilections of the singular dominant species that mostly lacks such abilities—humans (The human eye is the only recognized organ evolved to perceive the electromagnetic spectrum, e.g., visible light).

Harold Saxon Burr, MD (1889–1973), who taught anatomy and neuro-anatomy at The Yale School of Medicine for 43 years, was the first scientist to conduct precise long-term field studies of natural electromagnetic field (EMF) effects on flora and fauna. Burr focused on establishing the first unified electrodynamic field theory of life, using hydra, frog, and salamander models because of their morphogenic properties (2, 3). Much was learned due to Burr's painstaking pioneering work about amphibian electrophysiology and cellular microcurrent in wound healing (4, 5), including the electrophysiological properties of cell differentiation, and eventually dedifferentiation pertinent to all contemporary stem cell research. Today Burr's work has implications regarding endogenous microcurrent and limb regeneration in humans, as well as dedifferentiation/stem cell/morphogenesis for cancer treatment and other healing modalities (6).

Burr also took exacting interest in the electric potential of trees, measuring how they changed in relationship to atmospheric alterations. He measured the electric potential in two tree species (maple [*Acer* spp.] and elm [*Ulmus* spp.]) located on one property, and another maple tree for comparison 40 miles (64.4 km) away. Numerous measurements via embedded electrodes recorded hourly readings from 1953 to 1961. Simultaneous records of temperature, humidity, barometric pressure, sunlight, moon cycles, sunspot activity, weather conditions, atmospheric-potential gradients, earth-potential gradients, and cosmic rays were correlated with tree electric potentials. It was found that the *electrical environment* correlated most closely with tree potentials while meteorological factors like light, temperature and atmospheric pressure did not in an immediate relationship (7). Burr also installed equipment that measured the potential between electrodes in the earth (about 10 miles/16.1 km apart) and the potential gradient of the air, finding that the air and earth potentials fluctuated exactly with the phase of the tree potentials.

Burr found that trees completely changed polarity when thunderstorms were approaching; the natural electrical environment correlated closely with tree potentials in a kind of entrainment to diurnal, lunar and annual cycles; and passing thunderstorms elicited anomalous behavior in the trees in direct parallel to measurements with the earth electrodes.

There are no other long-term field studies as detailed as Burr's of atmospheric EMF effects on plant species. His early research set the framework regarding how plants sense natural EMF and take immediate information from it. It is only recently that a research team in Italy (8) took up the mantle with an interest in spruce tree (*Picea ables*) reactions to solar events to assess their individual and collective bioelectrical responses to a solar eclipse. They found trees anticipated the eclipse and synchronized their bioelectrical behavior hours in advance, with older trees showing greater anticipatory behavior in early time-asymmetry and entropy increases. They concluded that a collective relationship between trees exists with perception of upcoming celestial events; that it is shaped by individual tree age, and that there's a collective history pointing to the significance of synchrony in plants with natural phenomena.

As with flora, so with fauna.

Ecosystem perspective and low-intensity exposures

Similar synchronicities as noted above with the natural environment exist throughout diverse species. All of life evolved within the Earth's natural electromagnetic fields. This paper addresses potential adverse anthropogenic effects at ecosystem levels due to human technology. We examine nonionizing bands of the electromagnetic spectrum (EMF 0–300 GHz) which include the frequencies that fall between visible light below the ultraviolet range and the Earth's natural static fields with a particular focus on the radiofrequency (RF) bands between 30 kHz and 300 GHz—the primary wireless technologies contributing to rising ambient background levels today [see Supplementary material 1 in Reference (9)]. Since biological effects of static and ELF-EMF and RF are inevitably related, discussion of studies on these fields are juxtapositioned throughout this text.

In its natural state, very little radiofrequency radiation (RFR) reaches the Earth's surface. Aside from the Earth's natural extremely low frequency (ELF) direct current (DC) static magnetic fields and the Schumann Resonances, lightening and sunlight would primarily comprise our ecological exposures to the electromagnetic spectrum.

Of particular concern are the low-intensity anthropogenic exposures comparable to environmental exposures today (see Supplementary material 1). Animal species move in and out of these near-and far-fields constantly. At 100–200 ft. (30.5–61 m) distance from cell phone antenna arrays, an animal moving through the area can be exposed to a power density (energy moving through space) of 0.001 mW/cm^2 (i.e., 1.0 μW/cm^2). Depending on the frequency and object exposed, e.g., bird, insect, etc., the Specific Absorption Rate (SAR) at such a distance can be 0.001 W/kg (i.e., 1.0 mW/kg). Avian, bat, and insect species can often reach very close lateral proximities to transmitting infrastructure like small cells and cell tower antennas and experience much higher exposures. Depending on radiation patterns, absorption rates for small animals at ground level can be significantly higher too due to their smaller size. In Supplementary material 1, there are 33 starred citations at or significantly lower than SAR of 0.001 W/kg that include myriad effects capable of translating to effects in the wild.

Unique wildlife sensitivities

All living organisms evolved in a matrix of the Earth's static geomagnetic fields. Biological disturbance occurs at very low intensities to unfamiliar fields, sometimes even far below geomagnetic fields. Natural cellular biocurrent—minute electric current involved with all 'excitable' cells, e.g., nerve and muscle cell activities, can also be disturbed by exposures to various EMFs.

It has long been known that the Earth's geomagnetic field is needed to coordinate embryonic development in many species, and provides directional information for many migratory species, including: amphibians, birds, fish, turtles, insects, and even some bacteria (See Supplementary material 2 for a sampling of research citations per species). Natal homing behavior in some turtle, salmon, eel, cetacean, avian and insect species, e.g., Monarch butterflies (*Danaus plexippus*), also rely on natural geomagnetic fields to guide them over thousands of miles annually (10–13). Species that migrate according to the geomagnetic field are capable not only of detecting the field but also the orientation of the field.

Highly sensitive biological mechanisms are widely found in many nonhuman species in specialized electro/magneto-receptor cells that differ greatly between species according to environment. These enable living organisms to detect the presence, and immediate changes in, environmental fields at very low intensities. Unfamiliar low-intensity anthropogenic fields can disturb perceptions (14).

In aqueous environments with high conductivity and low impedance, electric fields as low as 5 nV/cm (similar to that produced by the muscles of a shrimp) can be detected in many species. Electroreceptors are the primary mechanisms and minute electric currents/fields are used to find mates and food and thought to be a form of communication in many species (15). In elasmobranch fish (sharks, rays, and skates), electric fields are perceived via highly conductive gel-filled canals near the head called Ampullae of Lorenzini, and magnetic fields through receptors in their mouths and eyes (16–18). Anthropogenic RF may even play a role in increased cetacean strandings in specific areas near coastal military radars (19).

In ground-based and aerial environments, electromagnetic perception is via a combination of a natural ferrous mineral called magnetite that has been found in every species studied (20), and through a complex free-radical pair reaction and conversion of electrons in a group of protein compounds known as cryptochromes (21, 22).

Cryptochromes are found in the retinas of nocturnal migratory songbirds showing complex communication with the brain for orientation when relying on magnetoreception (23, 24). Cryptochromes are also found to be a critical magnetoreception component in fruit flies [*Drosophila melanogaster* (25, 26)] and are also present in the retinas of other animals (27). Research also indicates cryptochromes in plants, which may be responsible for the effect of EMF on plant growth (28, 29). Cryptochromes are also known to be involved with circadian rhythms (30).

Oscillating magnetic fields have been reported to disrupt the migratory compass orientation in migratory birds (31–33), which are known to use a radical pair mechanism located in the eye that provides compass-like directional information, while magnetite in the upper beak senses magnetic intensity, thus providing positional information (34, 35).

The above are some examples of the information available; for more see Supplementary material 2.

What the research shows

Anthropogenic EMFs in all frequencies affect biological systems in vastly different ways than natural fields (36). Decades of *in vitro* and *in vivo* studies have found effects at very low intensities comparable to ecosystem levels today. Researchers have been experimenting on animal models for over 100 years and know how EMF couples with all animal taxa. Many biological effects have been documented at low intensities comparable to what wildlife experience within 200–500 ft. (61–152 m) of a cell tower. Reported effects include: genetic, growth, and reproductive alterations; increases in permeability of the blood brain barrier; stress protein increases; behavioral changes; molecular, cellular, and metabolic alterations; and increases in cancer risk (see Supplementary material 1).

Major literature reviews exist in all frequencies on low-level EMF effects to non-human species (37–46). Most environmentalists and regulators are unaware of this body of work.

Ecosystem effects

Between 2021 and 2022, three of the authors (BBL, HCL, AMM) published four papers (9, 47–49) that matched for the first time the measured rising ambient RF levels in various environments to the low-intensity effects literature comparable to far-field exposures that wildlife encounters today. They found enough recent research on increasing ambient levels, and an overwhelming amount of evidence in all five animal kingdoms and taxa studied, to warrant concern. Extensive tables of biological effects contained in the papers' Supplements found: 27 studies on measured rising background levels; 123 studies on combined fauna/flora effects; and 59 studies on genetic effects (12 on ELF; 47 on RF). For flora: 16 studies were found on static magnetic fields; five studies on pulsed magnetic fields; eight studies on ELF magnetic fields; and nine studies on RF. The flora studies alone pointed to the fact that plant growth and physiology—with root systems anchored in the ground while tree tops thrive in the air—are affected by exposure to EMF in complex synergistic ways and are susceptible to multi-frequency exposures throughout their life spans.

Three of the above mentioned papers (9, 47, 48) when combined, cited over 1,000 studies and many more have been added to the database since the 2021 publications. Ambient RF-EMF low-intensity levels are a growing ubiquitous unrecognized environmental cyto-and- genotoxin: in a 2010 paper on cell tower exposures, two of the authors (BBL, HCL) cited 57 low-intensity papers (50); in the 2021 papers 123 were cited (47); today (October 2025) there are at least 248 updated studies (see Supplementary material 1). Increases in ambient levels between the 1980's and today directly parallel unprecedented species losses, among other factors like climate change and habitat destruction (46).

A clear pattern emerged in the flora studies (over 200 were found): plants, trees, and seeds respond positively, e.g., increased germination, cell growth, and vitality to natural static and ELF-EMF, but react adversely to RFR with failure to germinate or thrive, and with increased dieback. One explanation is that static and ELF-EMF's positive effects and RFR's negative effects is based on morphological differences in plant cells (versus animal cells) in that plant cell walls are active organelles that regulate cell division and growth, as well as control cellular communications. Plant cell walls contain significant amounts of water. It is thus possible that cell-wall absorption of RF causes a microthermal effect that adversely affects plant cell functions, including apoptosis, while ELF-EMF is not likely to cause such heating effects. [See Supplementary material 4 in reference (47)].

Small cells mounted on utility poles now commonly used for 5G bring RF very close to flora. Progressive defoliation has been documented in Europe (51) in slow tree dieback after cell towers/antennas were installed nearby. The same can be expected of small cells. This is particularly relevant for urban forestry efforts, parks, and tree cover in a warming world. Cell infrastructure is the largest contributor to increasing ambient exposures over the last three decades (52).

Extrapolations from laboratory research to the wild are difficult to make. In the wild, there is more genetic variation and mobility, as well as variables that confound precise data assessment. But there is clearly a growing body of evidence that finds damage to numerous wildlife species near communications infrastructure, especially where radiation measurements have been made. Far more field research needs to be done as the ambient levels continue to rise with each new technology. This is a serious new environmental concern.

5G is different

Novel EMF exposures do not allow living organisms to adjust since signaling characteristics change rapidly as new technologies are developed. Species cannot adapt or evolve with them.

Compared to natural geomagnetic fields and Schumann Resonances, anthropogenic EMFs, since their inception, have infused the environment with unusual signaling characteristics, odd waveforms, and modulations at intensities not found in nature. But 5G utilizes for the first time even more novel signaling characteristics—i.e., phased arrays with high peak exposures, Massive MIMO (multiple-in, multiple out sequencing), and focused beam steering that targets devices but passes through everything in its path—at higher frequencies >6 GHz that are capable of affecting insect populations in particular. Nothing like 5G has ever been used in broad civilian applications. And it is being deployed without environmental review of any kind.

5G in particular may impact insect populations as its carrier frequency, (millimeter waves [mmw]), couples maximally with some insects (53). Insects the size of fruit flies reach peak absorption in the upper microwave bands. Both thermal and nonthermal effects will likely occur.

Insects are inefficient thermoregulators and are especially vulnerable to temperature changes. One review of 73 reports found extinction rates had greatly accelerated. Insects in particular showed dramatic declines that could lead to a 40% extinction rate over the next several decades (54).

All radiofrequency transmissions contain ELF components in the form of pulsations and other signal characteristics used in modulation (55, 56), including broadband 5G. Honey bees are a seminal thoroughly modeled insect species for ELF and RF, including analysis of ecological effects. In a recent well-designed study, Molina-Montenegro et al. (57), found adverse effects in honey bees (*Apis mellifera*) exposed to ELF-EMF near high-tension powerline pylons in California, U.S. They assessed effects on pollination efficiency using both field and laboratory experiments via measured levels of gene and protein expression in metabolic pathways involved in stress and behavioral responses; and secondarily on honey bee behavior and seed production by measuring pollination failure on plant communities richness/abundance. They found that ELF-EMF caused a strong stress response in bees as demonstrated by enhanced heat-shock proteins (Hsp70) and antioxidant gene expression as well as increased expression of behavior-related genes. Ecological impacts to California poppy plants (*Eschscholzia californica*) growing near powerlines translated to lower floral visits by honey bees which then reduced seed production, which, in turn, lowered diversity and plant abundance. Adverse ELF effects between bees and plants were a proven closed loop. Negative effects were related to distance from the source and were observed only when transmission towers were online. They concluded that ELF-EMF has impacts on honey bees leading to ecological diminishment. There are many studies on honey bees going back decades (47, and see Supplementary material 2).

Environmental EMFs may also play a role in colony collapse disorder in bees (58), among many other factors.

5G's potential lethality to insects has recently been studied by researchers using computer modeling of honey bees and other insects based on frequency alone to determine power absorption rates with an eye toward understanding higher frequency effects >6 GHz. Thielens et al. (59) used numerical simulations of honey bee models to determine absorbed RF power as a function of frequency between 0.6 and 120 GHz which includes 5G and 6G. Computer simulations were then matched for the first time with *in-situ* measurements of environmental RF-EMF exposure near beehives in Belgium to estimate realistic exposure and absorbed power values in honey bees. They found that a relatively small shift of 10% of environmental incident power density from frequencies below 3 GHz used in 2–4G networks to the higher frequencies for 5G leads to a relative increase in absorbed power by a factor higher than 3. Frequency was the determining component. Thus, the shift to higher frequencies alone is detrimental to insects because their absorption rate is higher and thermoregulation abilities are lower.

Toribio et al. (60) investigated honey bee absorption rates in near-field exposures at 5G frequency ranges between 6 and 240 GHz, and also looked to see if the radiation performance of antennas remains stable when an insect is nearby. Using numerical simulations and micro-CT scanning, they found that in near-field exposures, the absorbed power can increase by a factor of 53, e.g., higher by a factor of 7 than the reported far-field increases noted in the above study. The simulations also found antenna radiation efficiency decreased by up to −40% when a bee appears in the near-field (the bee is absorbing RF). RF transmission gain patterns were also found to depend on the separation distance between the bee and the antenna, with a stronger higher frequency dependence.

Jeladze et al. (61) modeled honey bee exposures to RF between 2.5 and 100 GHz using numerical simulations based on the finite-difference time-domain (FDTD) technique with the goal of creating predictive SAR estimates in honey bee tissues. Whole-body and brain tissue-averaged honey bee SAR values were determined for all considered frequencies and normalized on 1 mW/cm^2 incident plane-wave power density; SAR values were also averaged over a volume of 1 milligram of tissue. They found, not surprisingly, that EMF absorption in insects depends on E-field polarization, frequency, and the insect's body peculiarities.

In a follow-up study, Jeladze et al. (62) broadened their inquiry with several other adult insect models: ladybug (*Coccinellidae septempunctata*), worker honey bee, wasp (*Vespidae* spp.), and mantis (*Mantis* spp.) at frequencies between 2.5 and 100 GHz. The goal was the same: estimate SAR values in tissues to inform predictive potential via energy absorption values per insect species. Whole-body and tissue-averaged, and using 1 mg SAR values were determined in insects for all considered frequencies for 10 different incident plane waves. SAR values were normalized to 1 mW/cm^2 incident power density. Maximal EMF absorption in brain tissues was determined at 6, 12, and 25 GHz for the most considered insects while ladybug brain tissue reached maximal absorption at 60 GHz. This was the first study to estimate SARs for multiple insects over a wide range of RF frequencies using 3-tissue heterogenous insect 3D models created specifically for this research. They validated tissues' dielectric properties and found EMF insect energy absorption highly dependent on frequency, polarization, and insect morphology.

The above body of studies alone should trigger a halt to any broad deployment of RF technologies in higher frequency ranges >3 GHz without significant environmental review and may indicate the need to reengineer 5G and newer networks altogether into lower frequency ranges.

One glaring problem is that newest exposure regulations for humans by The International Commission on Non-ionizing Radiation Protection (63) that are widely adopted throughout Europe and elsewhere now allow for higher RF *exposures* in the 5G ranges and are expected to top heating thresholds even for humans. U.S. regulations created by The Institute of Electrical and Electronics Engineers (64) and adopted by the U.S. Federal Communications Commission (65), already allow higher exposures in 5G frequencies.

Higher allowances for humans may have widespread catastrophic environmental impacts from insect mortality alone, capable of punching holes in the entire food web. The human food supply is potentially endangered from just this one new technology and the above describes just a few insect species. For additional species, see Supplementary material 2.

Part 2. Addressing radiation impacts to wildlife: policy ramifications

Defining the problem

In the United States, the Federal Communications Commission (FCC), which has jurisdiction over RF exposure standards, has systematically allowed wireless infrastructure to be excluded from environmental review, delegating oversight to industry players while disregarding public and scientific input. People are sometimes confused by the term "standards" (which indicate enforceability), versus "guidelines" (which imply choice and voluntary adherence). Guidelines are what the professional panels of scientists at IEEE and ICNIRP recommend in their advisory roles to regulatory entities, but once guidelines are adopted by regulatory agencies, they become enforceable standards. The problem is getting agencies to enact that enforcement. The same is true of existing laws that could protect wildlife from EMFs if they were applied to environmental EMFs.

The current regulatory framework is insufficient to protect humans (66) and even less equipped to address nonhuman species. There are no acute or chronic EMF exposure guidelines or standards for wildlife in the U.S. by the FCC or IEEE, nor any licensing and/or regulatory rules and procedures. The same is true internationally regarding the recommended limits by ICNIRP adopted throughout Europe, Australia and other countries. There are other U.S. agencies besides the FCC with enforcement powers to address this, e.g., the U.S. Environmental Protection Agency (EPA) and the U.S. Fish and Wildlife Service (USFWS), but the EPA has been completely defunded for nonionizing radiation research, even as they maintain oversight for all environmental radiation effects, and the USFWS has no in-house expertise to investigate it.

Any suppositions that standards written for humans are sufficient to protect wildlife too completely miss the point of nonhuman species' unique physiologies and extreme sensitivities far beyond that of humans.

Despite a growing call for action to address nonionizing radiation impacts, efforts to strengthen protections have been stalled by a politically and financially influential industry, coupled with a lack of political will and regulatory capture of U.S. Federal agencies (67)—all worsened by recent cuts to federal funding, staffing, and research capacity. A critical barrier to environmental protection lies in the fact that federal agencies have not formally recognized or evaluated the ecological effects of nonionizing radiation.

Airspace as habitat

One of the first steps toward effective integration of EMF ecological effects into the larger regulatory picture is to understand that airspace is "habitat" for many species, like water and ground is for species we already protect against various pollutants and interferants. Many wildlife species, especially birds, bats, and insects, depend on airspace for migration, mating, foraging, nesting/roosting, and territorial defense. It is time to recognize nonionizing EMF as a biologically active form of air pollution (acknowledging it is also a form of ground and water pollution too), and develop rules at the pertinent regulatory agencies to designate 'airspace as habitat' so EMF can be regulated like other pollutants. Defining airspace as habitat would provide a legal foundation to assess cumulative EMF impacts as well as mitigate exposures. With that definition established, the framework within which anthropogenic EMF acts as a biological agent in the biosphere would then be clarified.

It must be pointed out that EMFs do not always act according to standard toxicology models. EMFs are on a continuum of physiological "process" effects, not unlike endocrine disruptors, rather than chemical toxin effects. EMFs are capable of both directly and indirectly impacting numerous biological processes, cell types, and organs at both high and low intensities. The variables depend on

frequency, tissue type, species, size, orientation toward the radiating source, dose rate, exposure intensity, duration, and modulation, among others. The relationship is often nonlinear with the greatest effects occurring at lower intensities unlike classic linear dose–response toxin models. Such nonlinear dose–response relationships are common for many environmental toxins. [For a more in-depth discussion of airspace-as-habitat, see reference (48)].

Existing laws that could protect wildlife

There are numerous effective laws in the U.S. and in other countries that could protect many species of wildlife if we apply them to EMF like other pollutants. The discussion below pertains to U.S. laws but similar protective laws exist throughout Europe, in Canada, and elsewhere and U.S. laws can be used as models for other countries to adopt. In addition, some U.S. laws are regional with cooperative agreements between Canada and Mexico too, especially for migratory species (Box 1).

BOX 1 Existing U.S. laws/advisories that can apply to EMF environmental policy.

- The National Environmental Policy Act (NEPA)
- NEPA Interagency Agreement with the U.S. Fish and Wildlife Service
- The Migratory Bird Treaty Act
- The Bald and Golden Eagle Protection Act
- The Fish and Wildlife Conservation Act
- The Endangered Species Act
- …other agency regulatory agreements

National Environmental Policy Act

NEPA is a critical federal law designed to ensure that all major actions undertaken by federal agencies, including the approval of communications towers and wireless infrastructure, are evaluated for their environmental, ecological, and cumulative impacts. Enacted in 1970 under the Nixon Administration, it is an iconic environmental law constantly under attack by industries of all kinds (There are again current attempts to get it thrown out altogether). Under NEPA, federal agencies must assess any action with foreseeable environmental effects. However, the Federal Communications Commission has failed to comply with NEPA in numerous ways.

Erica Rosenberg, an environmental/public lands policy attorney with over 30 years' experience in U.S. Federal agencies, Congress, and academia, worked at FCC's Wireless Telecommunications Bureau (2014–2021) as a NEPA specialist. In 2022, Rosenberg wrote a definitive report on FCC environmental procedures and NEPA (68) in which she details how FCC systematically fails to comply by improperly categorizing major federal actions, like wireless infrastructure deployment, as exempt from review, thereby delegating environmental assessments to industry with no agency oversight; suppressing public involvement; ignoring cumulative and aesthetic impacts; and treating community concerns as legal complaints rather than legitimate input.

Rosenberg's paper is a roadmap for how to incorporate EMF into NEPA reviews in which she states:

- "Effects" need to be regulated as a part of National Environmental Policy Act (NEPA; 42 U.S.C. 4,321 et seq.) by a thorough, meaningful, and scientifically valid site review of all communications towers, structures, satellites, and related platforms whose transmitting and receiving frequencies are authorized and permitted by the FCC.
- "Effects" under NEPA are defined (40 CFR 1,508.1) as, "changes to the human environment from a proposed action or alternatives that are reasonably foreseeable," including direct and indirect impacts, and cumulative effects, and can encompass environmental, social, and economic changes that may occur as a result of the action, whether happening at the same time and place or later in time and further removed in distance from the impact (69). The terms "effects" and "impacts" are used interchangeably in NEPA analysis.
- "Direct effects" are impacts that occur at the time and place of a proposed action (e.g., the release of EMF from a communication tower killing or injuring migratory birds at specific times and durations at a specified tower).
- "Indirect effects" are impacts occurring later in time (e.g., impacts from EMF affecting the breeding and nesting behavior of migratory birds over time).
- "Cumulative effects" include the combined impacts of a proposed action when added to other past, present, and reasonably foreseeable future actions affecting the same area or wildlife species. These, for example, could collectively include the impacts to resident, breeding, feeding, transient, and migrating birds from cell tower radiation in the immediate area over time; ambient EMF in the immediate area and from nearby communication towers; habitat clearing for a tower; construction and maintenance site disturbance; herbicide use to maintain vegetation around towers; and other radiation impacts including from colocation of other antennas on a specified tower adding to the levels of EMF released.

Major impediments to NEPA

A major complicating factor for NEPA enforcement is the U.S. Environmental Protection Agency (EPA), which should be responsible for determining what constitutes an "effect," but has failed to define EMFs as having any such effects. EPA research into EMF bioeffects was halted in the mid-1990s and has since suffered from further staffing cuts. There is no dedicated EMF research effort in any agency for humans or wildlife. Without formal recognition of EMF effects, the NEPA process cannot function as intended, leaving wildlife unprotected.

Equally important, FCC's procedures now allow most cell towers and wireless infrastructure to be "Categorically Excluded" (Cat-Exed) under the FCC's NEPA review process (70). Examples include FCC's approval/fast tracking of the 5G network (71) which includes hundreds of thousands of new small cell transmitters mounted on utility poles, plus the agency's approval of the use of higher frequency millimeter-waves (72) for 5G without any environmental or wildlife assessment review.

Also categorically excluded from NEPA reviews or environmental assessment are all satellite systems, despite the U.S. Government Accountability Office concluding a multitude of possible environmental impacts, including increased space debris, atmospheric pollution, and interference with astronomical observations (73). The FCC continues to approve new iterations of Elon Musk's StarLink communications system, with no radiation impact assessments to humans, wildlife or their habitats from satellites transmitting in broad radiation patterns (like a flashlight beam) to and from ground-based and low-earth orbit infrastructure respectively, contributing significant 5G radiation to every corner on Earth for the first time at such a significant scale.

NEPA inter-agency cooperation

In February 2014, the U.S. Fish and Wildlife Service's Division of Migratory Bird Management played a key role in prompting the U.S. Department of the Interior to formally request that the National Telecommunications and Information Administration (NTIA), part of the Department of Commerce, conduct a cumulative radiation impact study as part of a NEPA Environmental Impact Statement (EIS) review of their emergency broadcast First Responder Network (FirstNet).

The request included a letter and technical attachment (74) co-authored by one of this paper's authors (AMM) and was aimed to evaluate radiation exposure and infrastructure impacts to migratory birds such as tower collision mortalities. The letter notes studies in Europe have documented nest and site abandonment, plumage deterioration, locomotion problems, reduced survivorship, and death.

The groundbreaking proposal in interagency collaboration, which saw an Environmental Impact Statement (EIS) initiated under the Obama administration (2014), was ultimately terminated during the first Trump administration. But since it set a precedent for establishing studies between federal agencies, it can hopefully be incorporated again in the future.

U.S Fish and Wildlife Service

Migratory Bird Treaty Act

U.S. Fish and Wildlife Service (USFWS) plays several important roles by implementing steps to "avoid or minimize bird take." "Take" under the Migratory Bird Treaty Act (MBTA; 16 U.S.C. 703 et. seq.) and its implementing regulations is defined as the un-permitted death, injury or crippling loss of migratory birds. USFWS does not normally issue permits for "incidental or accidental take" of migratory birds but when a *protected* migratory bird (under endangered or species-of-special-concern status) is involved, MBTA currently provides virtually no provision for "accidental or incidental take," e.g., causing injury or death, even when otherwise normal, legal business practices or personal activities are involved (70). The U.S. Congress noted the "take" of even one protected migratory bird to be a violation of the statute, with fines and criminal penalties that can be extensive (A federal permit is also required to possess a migratory bird and/or its parts). Where "take" can be avoided or minimized by the implementation of published/scientifically valid conservation measures (e.g., the USFWS's 2021 voluntary communication tower guidelines) (75), bird "take" and other negative impacts to the avian community can be reduced or even avoided. This applies to EMF exposure too. Injury, crippling loss, and death from nonionizing radiation can be considered "take" under the MBTA.

Bald and Golden Eagle Protection Act

Bald Eagles (*Haliaeetus leucocephalus*) and Golden Eagles (*Aquila chrysaetos*) are protected by the Bald and Golden Eagle Protection Act (BGEPA; 50 C.F.R. 22.3, 22.26 and 22.27). "Take" under BGEPA is more expansive than under MBTA (70) and includes the pursuit, shooting, poisoning, capturing, killing, trapping, collecting, molesting, and disturbing both species (50 C.F.R. 22.3). Permits are required for "disturbance take" (e.g., construction near an active Bald Eagle nest) and "take resulting in mortality" where an activity may result in eagle deaths (50 C.F.R. 22.26; e.g., collisions with Bald Eagle fledglings near an airport), as well as for "take of nests," for example where nests need to be removed when too close to an active airport approach/departure runway (50 C.F.R. 22.27).

As cell towers and wireless antennas are increasingly sited near eagle habitats and nesting areas, there are real concerns regarding the "take" of eagles from wireless infrastructure exposure. However, the U.S. Fish and Wildlife Service, which enforces BGEPA, has yet to address this. There is no clear guidance or permitting protocols to monitor, assess or mitigate EMF-related impacts. But with proper refunding at EPA, new staffing at USFWS, and inter-agency cooperation, there could be.

Fish and Wildlife Conservation Act

The Fish and Wildlife Conservation Act authorizes/guides the U.S. Fish and Wildlife Service to monitor, assess, and promote the conservation of non-game (i.e., nonhunted) birds, especially declining species, to prevent the need for federal listing and to maintain bird populations at stable or increasing numbers. This is a daunting challenge due to the direct and indirect effects of the many structural issues impacting migratory birds—e.g., collisions with towers, wind turbines, power lines, bridges, and building glass; electrocutions at power lines; impacts from climate change, habitat loss/degradation, pesticides, predation by domestic cats—and now from rising ambient levels of EMFs too (48). USFWS also tracks the growing numbers of Birds of Conservation Concern (BCCs), e.g., species in decline but not yet ready for Federal listing as threatened or endangered (50). Currently, there are some 273 species and subspecies on the national BCC, Service Regional BCC, and Bird Conservation Region BCC lists, providing an early warning of likely peril unless the population trends are reversed. These BCC lists require periodic reviews and updates under provisions of the Fish and Wildlife Conservation Act (16 U.S.C. 2,901–2,912).

Nonionizing EMFs should be systematically considered in the USFWS's conservation efforts since its impacts on bird populations add to the cumulative threats already identified, plus it aligns with the agency's responsibility under the Fish and Wildlife Conservation Act.

Endangered Species Act

Federally listed bird species, whose populations (based on systematic reviews) are declining (some precipitously), are those designated and protected under the Endangered Species Act (ESA; 7 U.S.C. 136, 16 U.S.C. 1,531 et seq.). Current species include some 78 endangered and 15 threatened bird species on the List of Threatened and Endangered

Species. An "endangered species" faces a significant risk of extinction in the near, foreseeable future throughout all or a significant portion of its range. A "threatened species" is at risk of becoming endangered in the near future. Collectively, BCC and ESA-listed birds represent at least 366 bird species (36% of the total U.S. bird population) in decline (some seriously), with numbers of both listed and BCC species growing (76). Additionally, the USFWS is also tasked to maintain stable or increasing breeding populations of Bald and Golden Eagles under regulations of BGEPA through compliance with NEPA.

Additionally, habitats are often despoiled by tower construction/operation, resulting in degradation, as well as bird and bat attraction/collision with towers, guy-wires, and lights. This is in addition to habitat fragmentation, noise disruptions, and other impacts (70). Studies have shown that cell tower radiation can couple with avian brain/eye tissue and act as an attractant to migratory birds, while also disrupting and disorienting them (14).

Next steps: changes needed at key federal agencies

BOX 2 Federal agencies with a stake in recognizing airspace-as habitat and EMF effects to wildlife include but are not limited to:

- The U.S. Environmental Protection Agency (EPA)
- U.S. Fish and Wildlife Service (USFWS)
- The Bureau of Land Management (BLM)
- U.S. Geological Survey (USGS)
- U.S. Forest Service (USFS)
- The Army Corps of Engineers (ACORE)
- The Federal Communications Commission

All must recognize and address wildlife impacts under whatever statutory authority is within their purview. The two major agencies discussed below would have the most immediate impact.

U.S. Environmental Protection Agency

Background

The U.S. Environmental Protection Agency [EPA, with a dedicated team of researchers (77)], was once the lead federal agency responsible for researching the health effects of nonionizing electromagnetic fields backed by legal authority concerning radiation protection under the Public Health Services Act, Atomic Energy Act, and National Environmental Policy Act (NEPA) (78). However, EMF bioeffects research was defunded in the mid-1990s and the agency no longer conducts EMF research even though all radiation fields, including the nonionizing bands, remain under its environmental purview.

As noted in a 1978 GAO report, the EPA's responsibility for eliminating/reducing harmful EMF effects had initiated the agency's research effort because there was insufficient data upon which to base a safety standard (79). In 1994, a GAO report (80) updated Congress that the EPA was still actively evaluating the biological effects of radiofrequency radiation and was in the process of developing exposure guidelines, which the agency later indicated were nearing completion and expected to be released in 1995 (81). However, amidst the heavy industry lobbying around the 1996 Telecommunications Act of 1996 (82) that would permanently change the wireless landscape forever, there was a provision giving exposure standards-setting and enforcement to the FCC for the first time (Since 1968, FCC's guidelines had been voluntary and states could create their own too). Near that time, Congress also defunded EPA's research efforts, effectively halting its work on developing science-based safety limits. FCC, which is a licensing and engineering entity that relies on outside health/environmental expertise to help formulate policy, lost its major independent government research/advisory partner on RF exposures just as wireless technologies were about to take off.

Today, the EPA has formally acknowledged that it "does not have a *funded* mandate" to evaluate wireless bioeffects. When asked in 2020 (83), and again in 2023 (84), about potential RF impacts on birds, bees, and trees, the agency stated it was "not aware of any EPA reviews that have been conducted on this topic."

Federal RF bioeffects research has all but ceased. There is no federal entity with expertise to evaluate the biological effects with implications to wildlife and the environment. The sole remaining federally funded initiative was in the 2000 National Toxicology Program's (NTP) $30 million animal study, which found "clear evidence" that RF exposure causes cancer and DNA damage in animals. Ironically, the U.S. Food and Drug Administration FDA, which originally nominated the NTP study in 1999 due to concern over long-term health effects in humans, later dismissed NTP's findings, arguing that animal studies were not applicable to human health (85) (Reverse logic would then imply the findings are more directly applicable to animals, such as small mammals nesting in trees near cell antennas and airborne species).

Despite its statutory authority, EPA is failing to protect the environment from EMF's increasingly pervasive ambient pollution. The agency should be refunded for this particular area.

Federal Communications Commission

The FCC is the only U.S. federal agency with an active role in ambient EMF control from infrastructure and some devices like cell phones which are also controlled by the U.S. Food and Drug Administration (Antennas and devices transmitting at or under 1,000 watts of effective radiated power are categorically exempt from FCC licensing requirements but documenting compliance is up to manufacturers).

FCC procedures to check for standards *compliance* regarding ambient RF levels are also designed exclusively around humans and fail to consider wildlife exposure *conditions*, e.g., compliance measurements near cell towers involve testing RF at ground level or other areas accessible to people, neglecting exposure in zones where birds, bats, insects, and tree canopies inhabit, including upper tree canopies and airspace at the height of the tower in a direct lateral exposure. As a result, towers can be deemed compliant even when they emit RF levels that exceed federal limits by thousands of times in near-field zones around transmitting antennas where wildlife exists. Further, in the U.S. there is no national measurement, oversight, or enforcement program/strategy in place to monitor levels near humans, much less in wildlife and ecologically sensitive areas. This void represents a significant omission in the U.S. regulatory framework.

As of this writing, there is one pending federal court mandate against the FCC to respond to research on wildlife impacts that could

alter this. In 2021, the U.S. Court of Appeals, DC Circuit, ruled in *Environmental Health Trust et al. v. FCC* (86) that the FCC's refusal to update its 1996 limits was "arbitrary and capricious," and in violation of the Administrative Procedures Act because the FCC did not show adequate review of the submitted evidence related to numerous issues such as long-term health effects and children's vulnerability. Further, the Court stated the FCC had "completely failed" to address the "substantive evidence of potential environmental harms" on the record, which included dozens of studies showing serious impacts to birds, bees, trees, and plants, some of which was previously provided by the USFWS's Migratory Bird Division to the FCC (74). As of this writing, the FCC has not responded to the Court's mandate, despite the submission to the FCC of numerous research studies published since the ruling.

No government worldwide has established science-based RF standards reflecting a threshold below which no adverse effects occur in animals and plants. This is a critical regulatory gap, given the low-intensity effects literature that now exist and is pertinent to ambient exposures (see Supplementary material 1). Exposures are expected to exceed even thermal thresholds throughout Europe and elsewhere that adopted ICNIRP standards (see Section '5G is Different' above). We are headed in the wrong direction.

Recommendations to protect wildlife

It is essential that science-based non-ionizing electromagnetic field exposure limits be developed specifically to protect wildlife, including continuous, chronic, low-intensity exposures. Meaningful RF limits will require large-scale, long-term research initiatives that include: laboratory experiments, field-based ecological studies, cross-species assessments for varying sensitivities among taxa, engineering studies that characterize real-world exposure scenarios, and species-specific dosimetry.

On a more granular level, it's critical to broaden the database that has begun matching RF resonant absorption in insects >3 GHz to include other species across the nonionizing frequency bands, with at least representative species per taxa computer modeled for resonance relationships. Many species experience significant EMF resonance effects depending on body size, water content, and morphology (62). Modeling resonance relationships via computational simulations with laboratory validation can identify at-risk species to various frequencies, including species-specific absorption peaks and exposure thresholds to better predict impacts across taxa. Because of the complexity of biological responses (often nonlinear and species-specific), this will require computational, engineering, biology, and federal/state expertise.

Different exposure guidelines for wildlife

There may be circumstances in which specific ELF/RF-EMF exposures need to be mitigated, e.g., during mating or migration periods when endangered or species-of-special-concern are known to inhabit particular habitats for shorter durations than year-round species. For instance, shallow springtime vernal pools that dry up during the rest of the year are the only breeding grounds for some endangered amphibians and salamanders in certain regions and it is known that both species are sensitive to anthropogenic ELF ground currents as well as RF (87, 88). Many avian and insect species also have a short-term seasonal presence in specific locations.

Anthropogenic ELF/RF-EMF is extraordinarily different in kind, field strength, duration, frequency, and signaling characteristics than anything that exists in nature. EMF can, and does, interrupt normal migration, mating, and food finding functions in nonhuman species, including in all environments (ground, air, aquatic) and in all taxa from microbiota to mammals (9, 38–43, 47, 49, 89, 90).

Any attempt to create exposure guidelines for flora and fauna needs to include the lowest intensity effects in both EMF static and anthropogenic exposures because that is where nonhuman species have evolved their unique physiological electromagnetic receptors. To exclude that literature is to miss essential human and nonhuman physiological difference. This is not an area where we can ignore fundamental differences in order to justify existing exposure standards for humans or conjure that such standards are sufficient for nonhuman protection too. That simply will never be the case.

Unfortunately, there is currently a new working group under ICNIRP's umbrella (91) whose mission is to do just that and there are a handful of studies pointing to the direction they will go and the methodology to be used. Several of the people in the working group are ICNRP members, including current and former ICNIRP chairs (91), and were instrumental in forming the criteria for a recent series of systematic reviews for the World Health Organization regarding human exposures which have come under heavy criticism for conflicts of interest, flawed methodology and failure to include critical information in their meta-analyses via their intentional exclusion criteria (92–96).

One example of a flawed research approach pertinent to wildlife that parallels the same flaws in the WHO systematic reviews is the proposal by Karipidis et al. (97) for a mapping protocol in which the authors described their criteria for review of existing evidence of anthropogenic RF-EMF effects on flora and fauna. Notably excluded was the most salient research at the lowest intensities at or near natural background levels where many nonhuman species have finely tuned electromagnetic sensory receptors. The protocol's elimination criterion defines study controls as: "Sham exposure, no exposure beyond the background exposure level (which can be assumed to be negligibly low), or exposure at a lower level" (97)." Therefore the lowest most biologically active exposures to wildlife were likely mixed in with controls and vanish into the analysis as a non-exposure, if they were included at all. The final publication from that proposal was Brzozek et al. (98) and it was inevitably skewed toward a biased outcome (The final paper interestingly left out the statements on low-level exclusions). Karipidis is the current director of ICNIRP, the first author of the proposal, and a co-author of the Brzozek et al. systematic review (98) with the stated purpose to see if current exposure standards for humans can also be considered protective of wildlife and plants. Their conclusion is that the research reviewed "…raises doubts on whether animals and plants are truly affected at levels below human exposure limits." Their exclusion criteria are also similar to the WHO systematic reviews methodology: 24,000 papers screened for inclusion but only 334 were considered eligible (277 fauna, 97 flora). Thus, like the flawed WHO systematic reviews that Karipidis played a leading role in conducting, ICNIRP's standards could be justified as applying to nonhuman species too. But that is fundamentally an insupportable conclusion when the most pertinent research is factored in.

The recent effort with conflicts of interest is by Prokscha et al. (99) which was heavily funded by industry associated/pro-technology development entities in Europe (See their paper's Acknowledgements and Funding). This study contains impressive modeling of simulated honey bee whole body and individual organ/body parts under THz frequency exposures which are significantly higher frequencies than similar studies conducted by some of the same authors (59–62). The study involved detailed material characterization of honey bee anatomy using resin-manufactured model bees to enhance computational accuracy in the THz range. RF-EMF exposure simulations estimated at 300 GHz revealed that at very short distances (1 mm) from the antenna, the authors said that bees: "…can absorb up to 26% of the input power into an antenna. In the near-field, the majority of the power is absorbed in the bee's exoskeleton. However, in the far-field, the inner tissues absorb a slightly higher relative fraction of the absorbed power. Observing compliance with the ICNIRP reference levels in the THz application, the maximally allowed far-field exposure of 10 W/m^2 corresponds to an average absorbed power of 0.29 mW into a honey bee worker." These absorption values are well within the range of many low-intensity effects studies in Supplementary material 1. Honey bees reach resonance in frequency ranges below the THz bands but this study shows that a quarter of the transmitted THz power is absorbed by the bee.

What is most problematic about this study however, is the fact that the purpose was to create THz technology to *monitor* bees and other small insects in the wild and in apiculture. It was intended to facilitate the development of new technologies using additional introduced frequencies in environmental settings to which insects are highly sensitive and reactive in order to monitor how they are doing in their natural environments. The paper envisions selling such equipment to bee keepers. There is a serious disconnect here, and potential damage to the very animals they are trying to observe.

It is possible that wildlife species could be afforded some level of protection if the recommendations as discussed in the "Science-Based Policy" section of "Recommendations to Protect Wildlife" below regarding allowable exposures are adopted. The values are based on the median of the low-level effects literature in Supplementary material 1 with a 10-fold safety protection factor built in as a reference level.

This is a highly inexact method of wildlife protection but is a beginning approach. The preferred model would be to systematically delineate specific resonance factors in representative sizes per species families that expands upon the approach of Thielens (53); Thielens et al. (59); Herssens et al. (100); Toribio and Thielens (101); Velghe et al., (102); Jeladze et al. (61, 62) beyond insects. It is possible to create an exposure model for all taxa with some clarity, but it will take time/research funding by appropriate independent investigators separate from industry influence as is unfortunately the current situation with the ICNIRP special working group that closely mirrors the mistakes of the former WHO papers mentioned. Their approach is methodologically flawed from the start.

Agency reform

Ethical model for environmental radiation protection already exists

There is a risk management approach for environmental radiation protection for ionizing radiation (IR), i.e., high intensity exposures, lasting significantly longer in the environment, capable of damaging DNA directly as well as causing a number of long-term devastating multi-generational effects to humans and nonhumans alike. Such ionizing effects are well established. No such risk management approach exists for nonionizing radiation (NIR). The physical mechanisms of action between ionizing and nonionizing radiation are different in some ways and similar in others. For instance, they break molecular bonding differently. IR has enough energy (>12 eV) to break certain atomic bonds directly whereas NIR breaks bonds via indirect mechanisms such as the creation of reactive oxygen species (ROS) leading to oxidative stress. In many ways, cellular reactions to NIR are more subtle than with IR via complex cellular stress responses at various exposure intensities, frequencies, and modulations that can affect multiple cell types with different long-term reactions (103). What NIR and IR have in common is that long-term biological damage is caused by excessive production of ROS and the inability of biology to repair damage other that via cell death which is a living organism's natural self-defense in order to preserve the entire organism. But when cells are sufficiently damaged beyond repair yet do not die, cells can continue to reproduce in a damaged state, capable of passing on mutant conditions.

IR and NIR effects are different enough that there are good reasons to regulate them separately, but some of the definitional divide is also based on professional "cultural territoriality" too.

The International Commission on Radiation Protection [ICRP; (104)] is a respected independent nongovernmental organization that provides government entities with recommendations/guidance associated with ionizing radiation from artificial sources used in medicine, industry, nuclear enterprises, and naturally occurring sources. It was founded in 1928 by the International Congress of Radiology to advance science and radiological protection for public benefit.

In recent years, ICRP has also created a framework for wildlife protection via risk management that could be useful in regulating nonionizing radiation as well. Their approach is based on ethical imperatives as first principles to prevent/reduce the frequency of deleterious environmental radiation effects to a level of negligible impacts on biological diversity maintenance, as well as species conservation and the health/status of natural habitats, communities, and ecosystems. ICRP also recognizes the need for national authorities to demonstrate such protection within legislative frameworks.

ICRP's focus is commensurate with overall level of risk and compatible with other environmental protections. They further acknowledge that there are necessary numerical guidelines regarding exposure/dose, dose/effect, and effect/consequence relationships. Their goal is to create for the environment "a sound scientific system" similar to that for human protection via a set of reference animals and plants. ICNIRP Publication 108 (104) defines a small set of reference species and relevant databases, discusses pathways of exposure, and collates/discusses best-available dosimetry data at different stages of life cycles. The publication further developed data sets for ionizing radiation measurements that may be within, or external to, each organism.

Their intention is that such information be used by national entities to develop more applied/specific numerical approaches to the assessment and management of risks to non-human species as national needs and situations arise. It is not intended to set regulatory standards per se, but rather as a practical tool for high-level guidance to help regulators/technology operators demonstrate compliance with existing legislation and to provide the basis for the creation of environmental standards by other entities.

The general outlines of ICRP's recommendations can be adapted to nonionizing wildlife protection too but much definitional ground work needs to be laid first, e.g., the recognition of airspace-as habit/aeroecology and database creation of representative species effects.

Changes at key federal agencies are important. Below are recommendations (see Supplementary material 3 for a consolidated table).

Environmental Protection Agency

- Define airspace as habitat: The Environmental Protection Agency (EPA), and all relevant agencies, should recognize nonionizing EMF as a biologically active form of pollution to air, ground and water. Airpsace should be designated as "habitat" so EMF can be regulated like other pollutants. Many wildlife species, especially birds, bats, and insects, depend on airspace for migration, mating, foraging, and territorial defense. Defining airspace as habitat provides a legal foundation to assess cumulative EMF impacts as well as mitigate exposures.
- EPA should launch a dedicated research program to evaluate the biological and ecological impacts of radiofrequency (RF) radiation, treating it as an environmental pollutant akin to lead and pesticides.
- This program should include hazard identification, long-term exposure studies, cumulative risk assessments, and synergies with other environmental stressors with a focus on both human health as well as wildlife.
- Determine what ICRP flora/fauna protection for ionizing radiation can/does apply to nonionizing protection; institute regulations according to ethical and biological constraints.
- The EPA should ensure that rigorous independent science, separate from industry influence, guides the development of science-based, federally developed safety standards that protect the public and the environment.
- EPA should maintain at least one bioelectromagnetics scientist to guide any programs.

U.S. Fish and Wildlife Service

- Re-initiate the inter-agency USFWS/NTIA EIS collaboration that provides the framework/preliminary study design for a radiation research bird study, which has already been developed.
- Acknowledge/address EMF effects to migratory birds, federally listed fish and wildlife, and other protected plants and animals. Exposure standards for wildlife need to include guidelines for "avoiding or minimizing take" of birds/listed species to include exposure standards for wildlife from chronic, low-level exposures to EMF.
- In December 2021, the USFWS updated a migratory bird "take" rule which overturned a Trump administration rule (M-37050) that had allowed incidental take. Amend the 2021 "take" rule to include known/suspected impacts from EMF radiation on migratory birds.

Federal Communications Commission

- The FCC should respond to the Court mandate in *EHT et al. v. FCC* by requesting relevant expert agencies evaluate current scientific evidence on flora and fauna.
- FCC should request research in relevant agencies to address data gaps to address updating regulations to include wildlife protections for chronic, low-level exposures.
- The FCC should include thorough assessment of wireless technology effects in tower permitting processes and incorporate changes into their rulemaking regarding "effects of communication towers on migratory birds."
- The FCC should work with USFWS to help private landowners develop ESA Section 10 Habitat Conservation Plans, especially in "critical habitat" where recovery goals for listed species have been designated and where impacts from cell towers and other radiation sources are at issue.
- The FCC should establish a measuring/monitoring program for transparency and environmental oversight to include a centralized, publicly accessible registry of all existing/proposed cell towers, 4G, 5G, and base station wireless facilities.
- The FCC should implement a nationwide EMF monitoring program that prioritizes ecologically sensitive areas where wildlife are vulnerable, e.g., national/state parks, forests, wildlife refuges, wetlands, coastal ecosystems, migratory corridors, and designated wilderness areas, along with human populations in other areas.
- The monitoring program should collaborate with environmental agencies to include environmental surveillance to track potential effects on wildlife, plants and trees. Monitoring species behavior, reproduction, and population trends in high-exposure areas would help identify risks and inform responsible infrastructure deployment, just as public health systems track human outcomes.
- FCC needs to bring its environmental review process in line with NEPA and restore public accountability. This includes developing NEPA-compliant procedures to assess cumulative environmental impacts on wildlife, insects, and flora.
- The agency should require documentation of categorically excluded (CE) facilities, such as small cells, and make environmental assessments, including RF compliance reports, publicly accessible.
- Regular, independent spot checks, particularly of RF levels pre- and post-construction, should be mandated for base station wireless facilities (cell towers, 4G and 5G).
- FCC should no longer allow industry advocates to self-determine the extent or need for environmental review. Further, public notice and comment periods must be meaningful, transparent and genuinely considered in the decision-making.
- FCC should implement NEPA reviews for all satellite systems, present and proposed.
- FCC should request congressional funding for at least one wildlife biologist on staff.

General

- **Pre-market testing:** All relevant agencies should premarket test technologies within their purview before deployment to include a cost–benefit/cumulative effects analysis regarding their impacts.
- **Pre-deployment environmental consultation and assessment:** Federal agencies should conduct full environmental reviews prior to licensing and national buildout of major new technologies like 5G, 6G and beyond.

- **Post-market environmental surveillance reporting systems:** Biologists, local governments and the public should have accessible transparent mechanisms to report ecological impacts. Such a system would support timely investigations; help identify patterns and inform mitigation measures.
- **Submit mitigation recommendations:** The relevant federal/state/local agencies related to natural resources should be consulted on proposed networks and deployment of wireless facilities and submit recommendations on protecting sensitive species.
- **Interagency coordination:** Agencies should develop internal expertise in bioelectromagnetics, establish formal interagency coordination, convene regular meetings to include the FCC, EPA, USFWS, NTIA, and others. Collaboratively assess/manage EMF/RFR effects through joint research, analysis and advisement to policymakers.

Science-based policy

Due to the many variables involved with biological effects—frequency, signal strength, duration, pulsing, modulation, resonance effects, and fluctuating wildlife presence, it is indeed a challenge to designate "safe" levels of radiation exposure in the environment, but a number of key steps can be taken to make facilities and habitats safer for wildlife. Compromises are understood as necessary but they must be science-based.

No one exposure limit can encompass protection for all flora and fauna given the variables, vast physical differences, and environments. What may protect one species may prove detrimental to another. It will be years before we have a general framework of frequency-dependent whole-body and-organ specific resonance factors per species. Thielens et al. (53); Toribio et al. (60); Jeladze et al. (61, 62) and Velghe et al. (102) have charted a computer modeled way forward for representative insect species that should be expanded to all taxa. There will always be unique absorption capacities per species and variations within those species. The best we can do at present is acknowledge the limitations of any broad approach and proceed accordingly over time to fill in the gaps.

One generalized method is to use the median of the low-intensity effects literature in Supplementary material 1 (see Box 2) to which most species are exposed today with an additional safety factor of 10 built in, knowing that this may not be enough to fully protect many avian, bat, and insect species capable of reaching very close proximities to infrastructure transmitters like small cells/towers. Until research is completed on resonance and other factors that clearly characterize risk to myriad species, we can only approximate exposure reduction based on data we do have for the most vulnerable species. It then becomes a question of what safety factor is most effective to potentially cover a broader range.

- **Exposures limits:** Set evidence-based RFR exposure limits and regulations for wildlife. As a starting point based on the median of the low-intensity studies in Supplementary material 1 with a 10-fold protection level, for wildlife this equals: SAR: 0.003 W/kg (3 μW/kg); Incident Power Density: ~0.005 mW/cm^2 (5.0 μW/cm^2). This lowers the ICNIRP and FCC exposure standards by a factor of more than 100.
- **Resonance modeling:** Evaluate species sensitivity and model whole-body and organ-specific resonance relationships per taxa; create a comprehensive database that is species- and frequency-specific, based on computer modeling matched with laboratory and/or field validation.
- **Update compliance procedures:** Tower/small cell compliance testing procedures must be updated to include RF exposure assessments at antenna height and in nearby wildlife habitats, not just at human-occupied ground levels.
- **Robust environmental evaluations:** Agencies need to conduct detailed environmental evaluations (e.g., EIS NEPA reviews that include mitigation) where new communication networks are proposed for wildlife/wilderness areas. Public consultation should be mandatory.
- **Environmental impact statements (EIS):** reviews should include proposed levels of electromagnetic radiation emissions as well as assessments of strategic design modifications to mitigate RF exposure including: directing antenna emissions away from critical wildlife areas like foraging, nesting, and denning sites; ELF mitigation could include designating appropriate locations for high-tension corridors and modifying existing wire configurations to reduce/cancel magnetic field intensity in sensitive habitats.
- **Satellite systems subject to NEPA:** All satellite systems, especially in low earth orbits like StarLink, must be subject to full NEPA reviews for effects to humans, wildlife, and atmospheric perturbations capable of adversely affecting habitat. Satellites have been categorically excluded from review from the start under the assumption that radiation reaching Earth was too low to matter. That is not accurate with the lower orbits used at today's satellite deployment scale occurring from many countries. Some migratory bird species fly at heights that increase their exposures significantly, especially from 5G networks. We are unfortunately going in the wrong direction with FCC rulings and political influence that exempt satellites from all NEPA review (105, 106).
- **Targeted protections for wildlife and habitats:** Wildlife does not have the luxury of EMF avoidance that humans do. Shielding and physical avoidance barriers around towers and high tension corridors are options to deter terrestrial ungulates, carnivores and small mammals but are not effective at blocking birds, bats, and flying insects. Only RF reduction can do that. Since the intensity of natural RFR is low (i.e., low noise level), and wireless communications use specific frequencies and modulations, reducing the emission intensity should have little effect on signal-to-noise detection by a sensitive receiver species.
- **Setbacks in federal parkland and state-protected areas:** Enhanced, species-specific targeted protections for wildlife and habitats should include: Minimum of 1,500 feet (457 m) setbacks between antennas and sensitive wildlife habitats to minimize ecological disruption (107, 108). This is particularly critical for areas such as National Audubon Society Important Bird Areas, ESA-designated critical habitats, designated wilderness areas, and federally listed bat hibernacula, requiring regulatory action by the FCC.
- **Establish low- to no-EMF zones:** Low- and no-EMF areas can protect important wildlife habitats and ecologically sensitive areas, especially during migration and mating seasons. These include designated wilderness areas, critical habitats, national parks, preserves and monuments, national historic sites, national forests and wildlife refuges, and world heritage sites among others.
- **Remove/restrict existing infrastructure:** In particularly sensitive areas containing endangered species, removing or restricting new wireless development may be needed. 5G and 6G's use of higher-frequency sub-millimeter/millimeter waves

that pose heightened risks to sensitive taxa, especially insects, should be prohibited in ecologically sensitive areas. Insects are food supplies for everything else. This will require coordinated involvement from the FCC, USFWS, NPS, USFS, BLM, ACORE, and others will need to be key players in these efforts including state-level park and wildlife management agencies.

- **Barriers, radiation patterns, and others:** Inexpensive mitigation measures include: maximizing the distance between wildlife and EMF sources with barriers, re-design of transmission radial plots away from sensitive habitats, and powerline placement on pylons to reduce magnetic fields near corridors can all help mitigate effects to wildlife. Regarding avian protection, information for the electric utility and communications industries is available through the Avian Power Line Interaction Committee (APLIC) (109, 110).
- **Wildlife radio tracking:** Radio tracking gear attached to wildlife by researchers, wildlife professionals, animal trackers, and others use pulse modulated RF in communication with satellites and can cause adverse effects to animal health as well as interfering with magnetoreception, behavior, hunting and reproduction, and can cause tissue damage over time (111, 112). Wildlife should not be unnecessarily enlisted as inadvertent research subjects or for human curiosity/entertainment. Non-invasive tracking methods should be prioritized over telemetry when possible, safer technologies need to be designed, and telemetry tracking gear more carefully assessed by state/Federal agencies that use/permit such gear (e.g., NPS, USFWS, USFS, BLM, ACORE, and NOAA-Fisheries). Best management practices should be used, including configuring devices to minimize EMF emissions especially to the brain, keeping radio telemeters in sleep mode where feasible, reducing the amount of tracking gear and the number of target animals used, as well as lowering the transmission times/rates. Tagged animals should be monitored for health and behavioral effects (111). Pertinent agencies that use such gear, as well as the Federal Trade Commission, could provide updated consumer tips to scientists regarding telemeter use (113). State veterinary departments should be made aware of the potential impacts from radiation before issuing permits needed by wildlife researchers to conduct their tracking studies on State and private lands.
- **As low as reasonably achievable (ALARA):** The ALARA Principle should follow science-based thresholds (114), minimizing exposure levels wherever possible. In practical terms, this means that whenever a new tower or wireless facility is proposed, regulators, network engineers, and decision-makers must ask: "Is the radiation truly as low as it can be?" This question must guide every aspect of infrastructure planning, including placement, design, transmission power densities, frequencies used, time-of-use relative to wildlife presence, migration/reproduction timeframes and more. ALARA alone, however, is not enough since no formal definition of what ALARA means for wildlife currently exists. Without scientifically established exposure limits, industry players may claim they are already meeting ALARA, when they are in fact greenlighting harmful exposures. To truly protect ecosystems, we must develop robust, science-based limits grounded in a comprehensive understanding of biological impacts across species and habitats.
- **Technologies designed with wildlife in mind:** New technologies and communication networks need to be designed with wildlife protection as a priority. Supported by the scientific evidence, there is growing scientific momentum toward incorporating environmental considerations into the design and deployment of communication technologies (115).

Discussion

Virtually all terrestrial plants and animals, and some marine organisms are inadvertently affected by exposures from anthropogenic ELF/RF-EMF, including at extremely low thresholds, barely above natural background levels. The evidence for impacts is incontrovertible (9, 47, 48). Yet despite the ever-mounting scientific evidence that EMF poses adverse biological risks to myriad flora and fauna, Federal agencies continue to ignore or minimize these impacts, leaving a critical gap in environmental protection.

When cell towers and wireless infrastructure are proposed, various permitting procedures review the U.S. Federal natural resource agencies that license and/or maintain a range of communication devices on the properties they manage, e.g., communication towers, emergency broadcast systems, and numerous other sources of point-to-point and Internet communications, but fail to address impacts to wildlife and their habitats.

As the current 6th major extinction epoch proceeds (116, 117) inaction is no longer a defensible response. The unchecked proliferation of electromagnetic fields is compounding the already severe threats facing wildlife. If we effectively reduce ambient EMF exposures, it might give imperiled species continuing chances to recuperate and reverse population declines.

Regulatory agencies must adopt science-based limits that take ambient low-intensity exposures into consideration, implement robust environmental assessments, and treat nonionizing EMF as a biologically active pollutant. The survival of countless species depends on how we respond today.

Any serious inquiry into EMF wildlife effects must begin from biological realities, not pre-existing dosimetry perspectives (49) as reflected in current standards for humans. Any attempts to claim that the standards for humans are adequate for nonhuman species (118) must be challenged as physiological impossibility. Rising ambient levels today may be leading to ecological crisis (9). New 5G and proposed next-generation networks are likely to target seminal species like insects upon which the entire food chain relies for survival.

A government-wide response is urgently needed, one that recognizes EMF as an air pollutant and treats airspace as habitat through the new discipline of air ecology (or aeroecology). Protecting this dimension of habitat is as critical as safeguarding land and water.

We must establish wildlife-specific radiation exposure guidelines, particularly for chronic, low-intensity exposures that current standards ignore. A robust, independent research program, free from industry influence, is essential and it needs to be developed, funded and implemented as soon as possible. Rigorously mitigating exposure to wildlife must become a standard practice. Existing field protocols, such as those used by the U.S. Forest Service can be adapted to monitor/ assess radiation effects in real-world settings. Many of the tools and knowledge already exist. We have field research protocols for cell towers, e.g., by the USFS that can be easily modified to include studies of radiation in the field (75).

Different exposure guidelines need to be created to protect wildlife and flora based on the low-intensity effects literature in

Supplementary material 1 which is mostly comprised of animal studies. Truly protecting wildlife, however, is a daunting task that may include frequency re-allocation, redesign of hardware and network engineering, and society moving away from certain competitive economic models, as well as ELF/RF-EMF-free zones during migration and breeding seasons (48, 49).

Some of the suggested agency reforms will, of course, require significant new funding at specific agencies like EPA and USFWS for added staff and research facilities. But many suggestions can be accomplished through better testing/enforcement within existing budgets, simple cooperation between agencies, and better technology and infrastructure design funded by vested industries. What is needed is the political will/institutional commitment to act. This will require not just agency reform, but a coordinated effort involving policymakers, scientists, conservationists, and the public. A science-based, risk-mitigation approach will ensure that wildlife and ecosystems are protected in the digital age.

Given the complexity of ecosystems and the subtle cumulative effects of chronic low-intensity exposures, delay will only deepen the ecological harm.

Author's note

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Author contributions

BL: Conceptualization, Investigation, Writing – original draft, Writing – review & editing. HL: Conceptualization, Writing – original draft, Writing – review & editing, Investigation. AM: Conceptualization, Writing – original draft, Writing – review & editing, Investigation. TS: Investigation, Writing – review & editing, Conceptualization, Writing – original draft.

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Supplementary material

The Supplementary material for this article can be found online at: https://www.frontiersin.org/articles/10.3389/fpubh.2025.1693873/full#supplementary-material

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February 9, 2026
Sacramento Planning and Design Commission
City of Sacramento
300 Richards Blvd., 3rd Floor
Sacramento, CA 95811

RE: Opposition to the Alhambra Redevelopment Project (P24-007)
Request to Deny Conditional Use Permit and Reject CEQA Exemptions

Dear Commissioner Kendra Macias Reed,

I am writing to express my strong opposition to the proposed Alhambra Redevelopment Project (P24-007). The project is inconsistent with the requirements of the Alhambra Corridor Special Planning District (SPD), it fails to meet the mandatory findings for approval of a Conditional Use Permit (CUP), and it is not eligible for the CEQA exemptions.

The City does not have substantial evidence to support approval of this project. Significant issues remain unaddressed, the project's violation of the Residential Preservation Transition (RPT) buffer zone, the presence of an unregistered underground storage tank (UST), and the absence of analysis regarding impacts to the neighborhood character, traffic circulation, sewer capacity, and public services. These deficiencies preclude any approval because this project doesn't meet the criteria of BOTH the 2040 General Plan and the City's Zoning Ordinance.

Below is a detailed summary of the reasons this project should be denied in its current form.

1. The Project Violates the Alhambra Corridor Residential Preservation Transition (RPT) Buffer Zone and SPD Height Standards

The project site lies within the Alhambra Corridor Residential Preservation Transition (RPT) buffer zone, an area the City established more than 20 years ago specifically to protect existing one- and two-story residential neighborhoods from incompatible, oversized development. The 35-foot height limit in the RPT was intentionally adopted to prevent visual intrusion, preserve neighborhood scale, and ensure a gradual, respectful transition between commercial corridors and residential blocks.

Despite these clear standards, the applicant proposes a tall, six-story, 332-unit building, nearly double the legal height limit. In addition, the Special Planning District (SPD) requires 300 feet of separation between any structure over 35 feet and adjacent residential zones. The proposed building is directly across the street from single-family homes, in direct conflict with the SPD's adopted development standards. A Conditional Use Permit cannot be used to override zoning, waive SPD requirements, or effectively rewrite the RPT protections. If the City believes the RPT standards are outdated, the appropriate and lawful process is a zoning amendment with full public review, not the misuse of a CUP to circumvent established regulations.

2. The Project Is Objectively Out of Scale with Adjacent Homes and Incompatible with the Neighborhood Character

The surrounding neighborhood is composed of 100-year-old one and two-story Craftsman, Period Revival and Bungalow homes. These modest, historic structures define the character of the Casa Loma Terrace neighborhood. In stark contrast, the applicant proposes a six-story, 332-unit building with minimal setbacks, creating a monolithic, out-of-scale presence that overwhelms the entire block.

Key incompatibility issues include:

Height and Mass - adjacent homes are 17–30 ft tall, while the proposed building is 68'2". The average house in this area is under 2,300 sq feet on 0.07 acre. The proposed project is 442,390 sq ft on 2.26 acres. It takes up an entire city block and completely eliminates an existing alley way. This dramatic disparity in scale is incompatible with the established residential fabric and violates the SPD's intent to ensure appropriate transitions between commercial and residential areas.

Privacy Impacts - The project introduces significant, unavoidable privacy intrusions. A full-length rooftop deck on the 5th floor directly faces the backyards and second-story windows of nearby homes. The deck spans the entire Alhambra-facing façade, directly across from numerous one- and two-story residences. In addition, dozens of outward-facing balconies on all sides of the building overlook single-family properties. These features fundamentally alter the sense of privacy and quiet enjoyment that existing residents reasonably expect.

Shadow Impacts - A six-story structure of this height will cast substantial shadows on homes to the north and east. In Sacramento's winter, the sun sits roughly 15 degrees above the horizon at 9 AM and 3 PM. At that angle, a 68-foot building casts a shadow of approximately 260 feet—long enough to reach well into front yards, living rooms, and backyards of neighboring homes. Even at winter noon, shadows extend roughly 130 feet. Winter is when sunlight is most essential for warmth, gardens, and basic quality of life. These impacts were not meaningfully analyzed.

Architectural Character - The Alhambra Corridor Design Review Guidelines require new development to be "similar in scale and architectural character to adjacent single-family residential structures." The proposed design is a generic HRGA Architects template used in multiple cities for multiple projects and bears no resemblance to the historic Craftsman, Period Revival and Bungalow styles that define Casa Loma Terrace. Large expanses of corrugated metal dominate three of its façades, directly facing historic 1930s single-family homes, despite the fact that no residential structures in East Sacramento use corrugated metal as a design material. This stark contrast creates a jarring visual intrusion and disregards the established aesthetic continuity of the area. The proposed six-story apartment complex is fundamentally incompatible with the architectural character of the surrounding neighborhood. It does not meet the SPD's architectural compatibility requirements.

Pedestrian Access and Neighborhood Integration - The project provides only a single primary entrance on Alhambra Boulevard, and nearly all residents will enter and exit through the 322-space parking garage. This design directly conflicts with the SPD's goal to "maintain and improve the character, quality, and vitality of individual neighborhoods." The 2040 General Plan emphasizes neighborhood streets should function as vital public spaces where neighbors interact, and that new development should strengthen a sense of place and integrate with the existing neighborhood. A building with no street-facing doors and a six-story garage-dominated

structure does not meet these objectives and does little to contribute to a vibrant, pedestrian-oriented neighborhood environment. This part of Sacramento has long been a family-oriented community. A 332-unit apartment complex in which 80% of the units are one bedroom or smaller is fundamentally inconsistent with that character. Rather than supporting families, it mirrors a hotel-style or student-dormitory model that would significantly alter the neighborhood's demographic makeup and purpose.

The California Court of Appeal's decision in Pocket Protectors v. City of Sacramento (2004) confirms that residents' fact-based concerns about aesthetics and neighborhood character constitute substantial evidence under CEQA. The court held that Sacramento violated CEQA by dismissing community-raised compatibility concerns and relying on unsupported staff conclusions. The same deficiencies are present here.

The City's claim that the Alhambra Corridor SPD lacks "objective standards" for neighborhood character does not relieve it of its obligation to apply the 2040 General Plan, which is the controlling legal document for all land-use decisions. The 2040 General Plan's Livability and Sense of Place section explicitly requires the City to respect the "unique character of established neighborhoods" (Guiding Principle #30). Its Vision Statement further directs that new development must "build on the city's existing assets and character." The East Sacramento Community Plan reinforces this mandate by identifying neighborhood character as a defining and protected feature of the area. These requirements are binding directives of the 2040 General Plan and the City's zoning policies, not optional guidelines the City may choose to disregard.

3. The Project Cannot Qualify for CEQA Exemptions Due to Hazardous Materials

The City's assertion that the project is exempt under PRC §21080.66 and CEQA Guidelines §15183 is incorrect. The site contains known and potential hazardous materials, including an unregistered underground storage tank (UST) with petroleum products. This alone disqualifies the project from relying on any CEQA exemption.

A 2022 GeoCon site study identified an unregistered 1,500–2,000-gallon UST containing approximately six inches of No. 3 or No. 4 fuel oil. The tank is located beneath Chinatown Alley, directly in the path of the proposed stormwater drainage system. This is a significant environmental hazard that has not been characterized, analyzed, or mitigated. Under CEQA, a project located on a site with potential hazardous contamination cannot rely on an exemption unless all potential hazards are fully identified, evaluated, and addressed. In this case, neither the property owner nor the City has produced a Phase I or Phase II Environmental Site Assessment specific to this underground storage tank (UST). There has been no soil sampling, no groundwater sampling, no vapor-intrusion analysis, no hazardous-materials clearance, and no documentation confirming UST removal or remediation. This is precisely the type of situation CEQA contemplates when requiring full environmental review. The absence of basic environmental due diligence makes reliance on an exemption improper. This project is a textbook example of one that requires comprehensive CEQA analysis, not an exemption.

The site has a long and complex history of petroleum contamination. From 2000–2018, the property underwent remediation for a leaking 8,000-gallon diesel tank and 1,500-gallon gasoline tank. MTBE contamination migrated beneath Business 80, raising concerns about a Caltrans irrigation well. The State Water Board denied multiple closure petitions, citing unresolved issues. The final 2018 closure letter addressed only petroleum contamination, not other hazardous substances. This history alone warrants caution and further investigation, yet neither the owner nor the city have conducted one. GeoCon's 2022 Phase I ESA explicitly warns that Phase I ESA is not a comprehensive site characterization. The assessment did not evaluate the site for wetlands, asbestos-containing materials, lead-based paint, lead in drinking water, radon, mercury from historic mining, methane, mold, PFAS, or naturally occurring hazards such as asbestos or arsenic. GeoCon could not access multiple areas of the site, including residences on the western portion, a gated area in the northwestern portion of 324 Alhambra Blvd., a second-floor room in the central portion of the building. These access limitations created significant data gaps. An inactive hydraulic elevator was found in the basement; older hydraulic fluids may contain PCBs; a hazardous substance linked to serious health effects. GeoCon's own report makes clear that the site has not been adequately assessed for hazardous materials. You cannot approve the project subject to a future hazardous-substance investigation.

In addition, PRC Section 21080.66 of AB130 was not passed until 6-30-2025, which is after the Initial study/ Mitigated Negative Declaration report was published on April 21,2025. CEQA exemptions cannot be applied retroactively.

4. Traffic and Transportation Impacts Are Severe, Unstudied, and Inconsistent With the 2040 General Plan

The project proposes a 332-space parking garage and is expected to house up to 870 residents. This is a car-oriented development, not a transit-oriented one. The site is not located in a Transit-Oriented Development (TOD) area. The nearest light-rail station is over one mile away, the closest bus Route 134 operates only one trip per day, another bus route #30 is over ½ away and the only other bus route # 67/68 goes only to Arden Fair (over 3 miles away) and Consumnes River College. This is not a transit-oriented housing project. A project with 332 parking spaces in a low-transit area will generate high levels of driving, conflicting with the 2040 General Plan Mobility Element (Policies M 1.2–M 1.5), which prioritizes, reducing Vehicle Miles Traveled (VMT), shifting trips to walking, biking, and transit; and concentrating growth in high-frequency transit corridors. The 324 Alhambra location is not on a high-frequency transit corridor. Approving a large apartment complex with a parking structure at this location directly undermines the City's climate, mobility, and complete streets commitments.

All project traffic must exit onto 30th Street, a narrow one-way residential street that already experiences, congestion, blocked emergency access, and limited eastbound connectivity. C Street is the only eastbound route to 33rd Street and is already heavily congested due to freeway access at McKinley Blvd (E Street). Fire trucks and ambulances have previously been unable to pass when cars are parked on both sides of 33rd Street and C street. Adding hundreds of new daily trips will worsen these conditions.

East Sacramento contains several streets identified by the city as part of the High Injury Network and Vision Zero Top 10 corridors. A recent transportation study for the Streets for People Plan found East Sacramento experiences high levels of pedestrian traffic stress. The intersection of H Street and 29th Street is the second most hazardous location in Sacramento for collisions involving vehicles, cyclists, and pedestrians. The City's adopted strategy is to reduce vehicle speeds, minimize turning conflicts, and reallocate space to safer modes. Adding over 900,000 more vehicle trips per year moves in the opposite direction. It increases congestion, conflict points, and risk to pedestrians and cyclists. This is inconsistent with the City's Vision Zero policy and the East Sacramento Community Plan.

The project is located within 200 feet of one of the most congested segments of the Business 80 freeway, in an area with some of the highest pollution burdens in Sacramento. The nearby freeway ramps at McKinley Blvd (E Street), H Street and J Street are notorious for multi-cycle delays, red-light running, and dangerous conditions for drivers, cyclists, and pedestrians. Traffic in East Sacramento has become increasingly dense and hazardous, and future development in the River District and Railyards, which is expected to double the size of downtown, will further increase congestion. The ability to offset this with fees or credits does nothing to improve safety, reduce congestion, or address local traffic impacts.

5. The Combined Sewer System (CSS) Cannot Support This Project

The project is located within Sacramento's 100-year-old Combined Sewer System (CSS), where wastewater and storm water share the same pipe. The City's own audit concluded that the system is deteriorating faster than it can be repaired, underscoring how unsustainable current conditions already are. According to that audit, 30% of wastewater assets are already at end-of-life, critical data on pipe size, age, and capacity are missing, and the City lacks sufficient staff with the expertise needed to maintain the CSS system.

The project proposes to route wastewater from approximately 870 residents into an 8-inch CSS pipe on the west side of the site, which then connects to a 100-year-old line on 30th Street. Stormwater would be routed through Chinatown Alley, directly over the unregistered UST, into undersized 8-inch CSS pipe on Alhambra Boulevard. The McKinley Park sewer vault reached capacity during its very first storm event in 2021, resulting in street flooding. The city required the McKinley Village development to construct an offline holding tank to prevent system overload and protect public health and safety. The same requirement should apply here. The city cannot selectively enforce infrastructure mitigation requirements, especially when this project is located in an area with known CSS vulnerabilities.

These combined sewer pipes were never designed to accommodate the volume generated by a six-story, 332-unit building. The City has provided no hydraulic modeling, no capacity analysis, and no engineering documentation demonstrating that the system can safely handle the additional load. Approving a project of this scale without a full infrastructure analysis is irresponsible and inconsistent with CEQA. The City has not produced a CSS capacity study, a stormwater conveyance analysis, a wastewater flow projection, or any engineering evidence demonstrating that the system can safely accommodate this project.

6. Parks and Public Services Are Already Overburdened

The 2040 General Plan requires 8.5 acres of parkland per 1,000 residents. With an estimated 870 residents, this project should provide approximately 7.4 acres of new parkland or equivalent recreational space. It provides none. Instead, it shifts the burden onto already overburdened public facilities without offering any meaningful mitigation. McKinley Park was identified in the 2040 Parks Plan as having the highest crime rate of all multi-use community parks in Sacramento. It is already overcrowded and understaffed. The City's Initial Study claims that "multiple parks are within walking distance" is misleading. Sutter's Landing Park requires crossing a dangerous freeway interchange and is not safely accessible on foot. McKinley Village parks are over a mile away and were designed to serve that neighborhood's residents, not East Sacramento as a whole. Proximity on a map does not equal safe, practical, or equitable access, especially in an area with high-injury corridors and unsafe pedestrian/bicyclist infrastructure.

McKinley Park maintenance crews cannot currently keep up with basic upkeep, and weekend parking is routinely nonexistent. Local residents frequently report cars blocking driveways and unsafe conditions caused by excessive park use demand. Adding 870 new residents without providing any new parkland will worsen overcrowding, degrade park quality, and undermine the City's own park-equity goals. As more high-density in-fill projects are approved, a growing share of residents have no access to private outdoor space. This funnels even more people into neighborhood parks, many of which already lack adequate parking, staffing, and enforcement of basic park codes. The city has not demonstrated how additional park-use demand will be accommodated, how existing deficiencies will be mitigated, or how public-safety impacts will be addressed.

7. The Project Presents "Unusual Circumstances" Under the *Berkeley Hillside* Standard

A six-story, 68+-foot building placed directly next to single-story homes within a designated Residential Preservation Transition (RPT) buffer zone constitutes an "unusual circumstance" under CEQA. The RPT zone was specifically created to prevent exactly this type of height and mass conflict. A project that so dramatically violates the intended scale, transition, and protections of the RPT cannot be considered "typical" or "expected" for this location. Under *Berkeley Hillside Preservation v. City of Berkeley* (2015), a CEQA exemption is invalid when unusual circumstances exist, and those circumstances create a reasonable possibility of significant environmental impacts. The extreme height and mass disparity between the proposed six-story building and the surrounding one-story homes is highly unusual for an RPT buffer zone. Because unusual circumstances are present and substantial evidence shows a reasonable possibility of significant impacts, the City cannot lawfully rely on a CEQA exemption. Full environmental review is required.

Conclusion

The Alhambra Redevelopment Project (P24-007) should not be approved as proposed due to it:

- Violates the RPT buffer zone and SPD height standards
- Is objectively incompatible with the surrounding neighborhood character
- Relies on an unlawful and unsupported CUP request
- Cannot qualify for CEQA exemptions
- Contains an unregistered UST with petroleum product
- Burdens a failing combined sewer system
- Exacerbates traffic congestion and safety hazards
- Strains already overused parks and public services

The City cannot make the required CUP findings, nor can it lawfully rely on CEQA exemptions. Substantial evidence demonstrates significant environmental impacts, unusual circumstances, and clear inconsistencies with zoning and the 2040 General Plan. CEQA Guidelines §15183 applies only when a project is consistent with the zoning and the General Plan, this project is not.

For these reasons, I respectfully request that the Planning and Design Commission deny the Conditional Use Permit and require a full CEQA review.

I want to be clear: I am not opposed to infill housing. East Sacramento already contains numerous well-designed, three-story condominium and mixed-use projects that respect neighborhood scale and character. What I oppose is this project because it is the wrong form of infill in the wrong location, and because it disregards the very planning tools the city created to protect established neighborhoods like Casa Loma Terrace.

The lack of genuine community outreach, the disregard for long-standing zoning safeguards, and the attempt to force a six-story building into a protected transition zone make it clear that this process has not been guided by the needs or concerns of the people who actually live here. People choose East Sacramento for its livability, walkability, and human-scaled character. Many of us moved here specifically to avoid the congestion and intensity of downtown and Midtown. This project would fundamentally alter the fabric of the neighborhood and impose long-term negative impacts on residents who have invested their lives here.

I urge the Planning & Design Commission to uphold the City's own planning documents, respect the intent of the RPT buffer zone, and require a project that is appropriately scaled, environmentally responsible, and consistent with the 2040 General Plan. Doing so is not anti-growth it is responsible planning.

Thank you for your time and consideration. I hope this information assists you in making a sound and legally defensible decision.

Sincerely,

Ann Broderick
East Sacramento Resident

Zachary Dahla

From: Kathy Styc <kathy.styc@yahoo.com>
Sent: Wednesday, February 11, 2026 4:54 PM
To: Zachary Dahla
Subject: Opposition to Redevelopment Project P-24-007

I have lived in Sacramento for over 75 years and I am very upset at how the city has been ignoring community input on new over-sized development projects. In the process of trying to increase the community, the planners, and city council are destroying the character of Sacramento. At some point, this will turn around and people will not want to live here.

The density of housing certainly can be increased but the city should respect it's own planning limits. If you go to the trouble of having a Planning Department and plans, why are you ignoring them? We have such a variety of wonderful neighborhoods in Sacramento, and Planning Districts and Plans have been developed to keep the character of those neighborhoods. If you violate that, Sacramento will become a sprawling mess with buildings and complexes just plunked down wherever there is vacant land and a developer who wants to make money rather than benefit the community.

Redevelopment Project P24-007 is such a project. It is obvious to see how the project will totally overshadow the existing neighborhood and make the surrounding homes less desirable. The amount of cars and traffic that will be generated will add to the traffic, accidents, and the air pollution in that area. I do not see any benefit to the proposed size of the development and setting a precedent of ignoring your establihed plans.

Thank you,
Kathy Styc
700 Commons Drive, Sacramento

Zachary Dahla

From: Elsie Bowers <elsiebowers16@gmail.com>
Sent: Wednesday, February 11, 2026 5:23 PM
To: Zachary Dahla
Subject: Alhambra Corridor Redevelopment Project P24-007

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Mr. Dahla,

As an East Sacramento citizen for over 47 years, I am writing to express my adamant opposition to the Alhambra Corridor Redevelopment Project.

My concerns are as follows:

First, the proposed height is nearly twice the limit allowed by the Alhambra Corridor Special Planning District. Approving this would eliminate established neighborhood protections and set a concerning precedent for future building compliance.

Second, the addition of new housing units and retail space will significantly increase traffic and congestion, making the area more hazardous for drivers and pedestrians.

Third, the impact on the infrastructure would be severe. The existing sewer system is aged and already overloaded, yet there appears to be little investment planned to address these requirements.

I urge you to address this potential crisis by considering a scaled-back structure that benefits the community rather than putting it at risk.

Sincerely,

Elsie Bowers
5318 E Street
95819

Zachary Dahla

From: Elizabeth Grant <elizabeth.rachel.grant@gmail.com>
Sent: Wednesday, February 11, 2026 7:51 PM
To: Zachary Dahla
Subject: Comment on P24-007

Dear Mr. Dahla,

I was really disturbed and upset to see the city's solution to the housing problem is to add a giant apartment complex in an area that lacks the infrastructure to support it. I'm referring to the 6-story Alhambra corridor Redevelopment Project, P24-007, on Alhambra between C and D Streets.

I understand that there is a need for affordable housing, but this is not the solution. The city should be more creative and civic-minded with their problem-solving -- you should be working with communities, not against them. Destroying the character of a community, adding traffic congestion to an already busy area, and putting pressure on a failing sewer system is going to cause more harm than good. Moreover, the Alhambra Corridor Special Planning District limits buildings to a height of 35 feet, and this proposed apartment complex is obviously taller than the limit.

If you allow such a complex to be constructed in East Sac, you are setting a precedent that developers can run rampant in the city and flout local laws, codes, and regulations. Not only that, but it reflects poorly on you, it tells the people that the developers have the local government in their back pockets.

We, as a city, are just coming back from the COVID-19 closures and urban flight. Don't destroy the newly re-burgeoning community of East Sac with a shoddy quick-fix to a much larger problem.

Yes, let's address the housing crisis, but in a way that makes sense! I urge you to please stop the construction of such a large building in an area that cannot support it. Let's either a) find areas of the city that have the infrastructure to support such a large apartment complex, or b) scale back the size of the apartment complex to a sustainable level.

Please oppose the construction of this building in its current form.

Thank you,
Elizabeth Grant
905 43rd St
Sacramento, CA 95819

Zachary Dahla

From: Ronie Saake <roniesaake@yahoo.com>
Sent: Wednesday, February 11, 2026 6:39 PM
To: Zachary Dahla; rkutect@gmail.com; District 4; Mayor
Subject: 6-story Alhambra Corridor Redevelopment Project

I have lived in Sacramento for 54 years, almost all of those years in East Sacramento. One of my residences was on Alhambra Blvd, between D & E St. Obviously changes will come with the growth of the city and many of the recent infill projects happening in midtown are a real asset to the city. I currently live in McKinley Village so I am not opposed to thoughtful development.

The biggest problem for me with the proposed Alhambra Corridor project is the traffic congestion that this will cause. Not matter where you live in East Sacramento you will feel the pain. J St and H St are a traffic jam every day after 4:00. Since the developers of the project do not have to provide an onsite parking space for every resident they will need to park on the street. There is not enough parking spaces on the street to accommodate the cars.

The block in question has been an eyesore for decades so an appropriate infill project would be welcomed. Stay within the height limits, maintain the character of the neighborhood and current residents will be supportive.

Ronie Saake
Sent from my iPad

Zachary Dahla

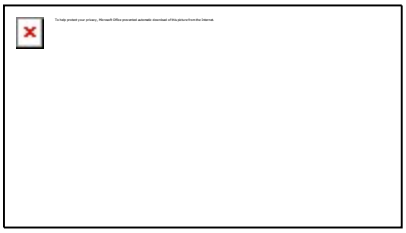
From: Ann Bettencourt <annbettencourt@gmail.com>
Sent: Wednesday, February 11, 2026 8:53 PM
To: Zachary Dahla
Subject: Vote No on Redevelopment Project P24-007

Dear Zach Dahla:

I moved to Sacramento three years ago and love living in Midtown. I understand the need for more housing, but please do NOT vote to approve the proposed Alhambra Corridor Redevelopment Project P24-007. The proposal is for a 6-story building which would be 3-4 times taller than the surrounding historic buildings. The 332 new apartments would also stress aging infrastructure—including water and sewer—and increase auto traffic in an area where there are five hospitals and lots of pedestrian traffic.

Please enforce the 35-foot height limit and prevent traffic hazards by voting against what would result in a huge increase in auto traffic and preserve historic neighborhoods.

Thank you.



Zachary Dahla

From: Chris Corcoran <ccorcoran64@mycci.net>
Sent: Wednesday, February 11, 2026 7:49 PM
To: Zachary Dahla; District 4; rkutect@gmail.com; Mayor
Subject: Proposed6 -Stoy Alhambra Development

Hi All,
I am a concerned East Sac resident on 61st. While I'm all in favor of new development, especially if benefits the entire community, I do have concerns after reading a flyer.
First, and most importantly, it seems there is already a law on the books prohibiting a development over 35 feet. Even if this is something everyone wants, it is not right to go against existing laws. We have quite enough of that coming from the White House. Secondly, there are legitimate concerns about overcrowding and infrastructure. The water issue is MOST concerning. Please either bring this to a vote for the public to approve, or pass legislation changing the existing law. Or, at the very least educate the East residents and alleviate their fears.

I sure hope this is not a Developers want to make a quick buck, and officials want to pad their campaign coffers. I know that is likely not the case, but you can probably see how voters could jump to these conclusions.

Thanks you for reading and I hope to attend the meeting,

Chris Corcoran

Zachary Dahla

From: Jean Gonzales <jm_g@sbcglobal.net>
Sent: Wednesday, February 11, 2026 9:20 PM
To: Zachary Dahla; rkutect@gmail.com; District 4; Mayor
Subject: Opposing this Massive 6 story Alhambra Redevelopment P24-007

I just received this information about the Feb 12th Alhambra Project meeting
I will not be available to participate so I am send you this letter.

So come to find out that his redevelopment is brought to you be none other than the original owners of the property, Demas Mary Ann's Bakery.
I see now no buyers were dumb enough to purchase this once highly contaminated property so the owners, Demas Mary Ann Bakery, drew up this ridiculous oversized plan, hoping some sucker investors will purchase it. Neighborhood protections were set and need to be honored regardless of how much money they have to spread around.
Please do not allow this Goliath of a development to take over and scale it back.

First time writer to this subject, please contact me for clarification if needed.
I do not want this project to move forward. My reasons are that for decades this property located here in Sacramento at 324 Alhambra Blvd in East Sacramento, between C street and D street zip 95816 has had highly contaminated soil. I do not believe any of the hazardous soil has been removed possibly because it is so toxic. Trying to cover it up with deadly chemicals is not the answer. It will eventually spread into the neighborhood. That is why there hasn't been any movement on the property. Now suddenly the Demas's found a quick temporary secret potion fix and think we have forgotten how dangerously hazardous it has been to our families.
I don't agree that whatever barrier they put in the ground to contain the toxicity will outlast the buildings that are planned to go there. Eventually that barrier will deteriorate to nothing and the poisoned soil will spread to neighboring properties. Putting the neighborhood at a most dangerous level of poisonous contamination, this is not good planning now or for the future. Please stop this development until the contamination can be physically removed from the property site, as not to spread. Do not allow a band aid for this poisonous land, all for monetary greed.
I am a bit of a lost for words as to how to address the approval of the removal of city trees. Who, what, when and where was it approved that the trees could just be demolished and put to death. As a lifetime Sacramento resident and current home owner on Alhambra Blvd I vote no, on the removal of any trees on Alhambra Blvd. Were the Mckinley Park residents included, given a vote on this do bad deadly decision. If the developers want to cut down and kill their neighborhood trees then so be it, But they do not have permission to kill. maim, destroy any tree in our neighborhood. They don't live here and think they can just say to cut down whatever Sacramento tree they want to. That our City Officials are so gullible as to accept anything with dollar signs waived in front of their faces. Where are our City Officials to let them know we just don't cut down our Sacramento city trees especially for profit. Please there is a reason for residential preservation and keeping height standards.
As to the height of this development 6 stories is not acceptable. This is in the Mckinley Park neighborhood not in Downtown Sacramento public office building. Please keep it at a height that will not over shadow the whole neighborhood. Just drive downtown and take a look at all the abandoned buildings. It isn't a good look. Keep it at a more exclusive place to live. With the 6 story height our homes will be the dark all day with no sunlight for our gardens which will also have a negative effect our mental health, electricity usage and to our own city trees which are cherished. The amount of traffic this 6 story project will produce is something that you need to understand. The corner of

Alhambra Blvd and C street is at the end of Elvas Ave which is a major thoroughfare(freeway?). We also have the gateway to the newly developing Mckinley Village which is a 50 acre site offering new homes for sale, as well as the new office at The Park, a 3 story 150,000 sf building which will be occupied with may employees adding to the traffic all meeting at Alhambra and C St to catch the 80 freeway or head downtown. A total overload of traffic for a neighborly narrow two lane street.

So let me say this. Can I remove the city trees which are located on the city easement property out in front of my home?
The property is owned by the city but yet the city has the homeowners maintaining the property. Mowing the lawn, trimming the 80 year old trees, paying the city for the water we have to use to keep the lawn and trees alive. Am we now being made aware that we do not have to and we can request to have the trees removed. Surely the City will allow me a lifetime resident of Sacramento to remove the worthless trees on the property where my home is located. I hope you understand the point I am trying to make, how concerning this overly exaggerated project is and not allow these outside traveling developers tell you what is good for Our City. I have faith that all my City Official overlooking this project will do the right thing for the Mckinley Park neighborhood families, as well as, the City of Sacramento. The sound of the freeway and trains are enough. We don't need more noise, loitering, littering, smoke, illegal parking, etc. that a overcrowding can bring to our family kid friendly neighborhood.
I could go on but I will end it here. Please stop and do not accept something that has been made to look acceptable on paper but in the long run will not hold true and is bad for our beautiful Sacramento Mckinley Park neighborhood.
Where will you be when the sewage spills over or backs up?
Thank you for your time.

Jean Gonzales
(916) 524-2344
jm_g@sbcglobal.net

est. 2021

GROUNDWORK

PRESERVATION, LLC

HISTORIC RESOURCE EVALUATION - FINAL

324 ALHAMBRA BOULEVARD, SACRAMENTO, CALIFORNIA

SEPTEMBER 27, 2024

Prepared for Demas Enterprises
by
Groundwork Preservation LLC

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Acronyms/Abbreviations

CEQA	California Environmental Quality Act
CRHR	California Register of Historical Resources
DPR form	State of California Department of Parks & Recreation DPR 523 form
ESA	Environmental Science Associates
IS/MND	Initial Study/Mitigated Negative Declaration
Groundwork	Groundwork Preservation LLC
HRE	Historic Resource Evaluation
NRHP	National Register of Historic Places
Standards	*Secretary of the Interior's Standards for Rehabilitation*

Summary of Findings

The proposed project (known as 324 Alhambra Blvd) would redevelop a city block in East Sacramento with a six-story, 332-unit market-rate apartment complex and a five-level parking structure. This Historic Resource Evaluation (HRE) was prepared by Groundwork Preservation LLC (Groundwork) for the project sponsor, Demas Enterprises. The City of Sacramento is the lead agency and the HRE was conducted to inform the City's review responsibilities under the California Environmental Quality Act (CEQA). The HRE will inform the Initial Study/Mitigated Negative Declaration (IS/MND) being prepared for the proposed project by the project sponsor's environmental consultant. The HRE was prepared by Groundwork's founder, Gretchen Hilyard Boyce, who exceeds the *Secretary of the Interior's Professional Qualification Standards* in History and Architectural History, with support from Associate Cultural Resources Historian, Ettienne LeFebre.

The purpose of this HRE is to identify historical resources in the study area, provide a discussion of the proposed project's conformance with the *Secretary of the Interior's Standards for Rehabilitation* (Standards), and evaluate the impacts of the proposed project on historical resources.

There are six historic-age properties within the CEQA Study Area, including two previously identified historical resources associated with the Puerta Sausage Factory at 320 and 324-350 Alhambra Blvd. Four additional properties, 311 30th Street, 315 30th Street, 3000 C Street/301 30th Street (a duplex unit), and 3004 C Street, were evaluated and determined not to meet the criteria for listing in the California Register of Historical Resources (CRHR). Groundwork confirmed that the two original buildings associated with the Puerta Sausage Factory constructed in 1926 and 1935 are eligible historical resources under CEQA and are the only historical resources located on the subject property.

The proposed project would require retention of 320 Alhambra Blvd and partial demolition of the non-contributing elements of 324-350 Alhambra Blvd to accommodate new residential construction. As currently designed, Groundwork concludes that the proposed project complies with the Standards, would not cause a substantial adverse change in the significance of the historical resource, and the buildings would still be able to convey their significance after implementation of the proposed project. As such, the proposed project would cause a Less-Than Significant Impact under CEQA.

I. Introduction

The HRE was prepared for the project in compliance with the City of Sacramento's regulatory responsibilities under the California Environmental Quality Act (CEQA) (CEQA Guidelines 15064.5(b)). The City is the lead agency under CEQA and the HRE will inform the Initial Study/Mitigated Negative Declaration (IS/MND) being prepared for the proposed project by others.

The CEQA Study Area contains six historic-age properties, including two previously identified historical resources associated with the Puerta Sausage Factory at 320 and 324-350 Alhambra Blvd. Four additional properties, 311 30th Street, 315 30th Street, 3000 C Street/301 30th Street (a duplex unit), and 3004 C Street, were evaluated and determined not to meet the criteria for listing in the California Register of Historical Resources (CRHR). Groundwork confirmed that the original portions of the Puerta Sausage Factory are eligible historical resources under CEQA and are the only historical resources located on the subject property.

The project sponsor plans to redevelop the subject block into a six-story, 332-unit market-rate apartment complex with a five-level parking structure. As part of the project, the project sponsor has requested support from Groundwork through this HRE to assess potential project-specific impacts under CEQA to the former Puerta Sausage Factory at 320-250 Alhambra Blvd as a result of the proposed project.

Project Area and Property Description

The project area is composed of eight parcels located within the City of Sacramento in Sacramento County, California. All parcels are owned by Demas Enterprises, the project sponsor.

APNs (Assessor's Parcel Number):
003-0112-001 (Parcel 1, 0.07 acres),
003-0112-002 (Parcel 2, 0.07 acres),
003-0112-003 (Parcel 3, 0.07 acres),
003-0112-004 (Parcel 4, 0.07),
003-0112-017 (Parcel 5, 0.07),
003-0112-018 (Parcel 6, 0.59 acres),
003-0112-020 (Parcel 7, 1.03 acres), and
003-0112-021 (Parcel 8, 0.29).

The project area is mainly developed, apart from Parcel 5 and Parcel 8, which are empty lots. The project area is situated in the East Sacramento neighborhood of Sacramento, California. The neighborhood is largely residential and is located north of Highway 50, east of the Interstate I-80 Business Loop, and south and west of the American River. The project area is one city block that is bounded by C Street to the north, Alhambra Blvd to the east, D Street by the south, and 30th Street to the west. One parcel in the southwest portion of the block, APN 003-0112-015, is owned by a separate party and not included in the proposed project. Surrounding land uses include residential and commercial areas.

The study area includes two historical resources; the original Pureta Sausage Factory building (built in 1926) located on Parcel 6 at 320 Alhambra Blvd, Sacramento, California; and the second Pureta Sausage Factory building (built in 1935) located on Parcel 7 at 324-350 Alhambra Blvd (see Figure 1: Location Map). 320 Alhambra Blvd is a one-story brick commercial and industrial building with a rectangular-shaped plan set on a concrete slab foundation. The building is located at the intersection of Alhambra Blvd and Chinatown Alley and is located on a rectangular parcel bounded by a chain-link fence and the surrounding streets. The primary façade faces south towards Chinatown Alley and 324-350 Alhambra Blvd. A parking lot is located to the north.

324-350 Alhambra Blvd is a one- and two-story brick commercial and industrial building with a rectangular-shaped plan set on a concrete slab foundation. The building is located on Alhambra Blvd between D Street and Chinatown Alley and is located on a flat and irregularly shaped parcel bounded by the surrounding streets. The primary façade faces southeast towards the intersection of Alhambra Blvd and D Street. A commercial business and 30th Street are located to the west and Chinatown Alley and 320 Alhambra Blvd is located to the north. Vehicle access to the buildings is from Chinatown Alley.

Figure 1: Location Map, Subject Block, Google Earth, 2024. CEQA study area indicated by red line.

II. Project Description

Project Overview

Demas Enterprises proposed to redevelop the subject block into a six-story, 332-unit market-rate apartment complex with a five-level parking structure. The subject block, a 320' by 340' city block located in East Sacramento, California, is bounded by C Street to the north, Alhambra Blvd to the east, D Street to the south, and 30th Street to the west and would exclude the parcel at the northeast corner of D Street and 30th Street. The apartment complex would contain E-shaped apartments ranging from studios to three-bedroom, and residential amenities would be dispersed throughout the complex. Amenities would include a lobby, leasing office, fitness center, yoga studio, coffee and bakery space on the ground floor, a rooftop patio on the fifth story; a rooftop pool, spa, and longue on the sixth story; and co-working spaces on all floors. Landscaped courtyards will be accessible from Alhambra Blvd down a path that will replace Chinatown Alley.

The Pureta Sausage Factory complex includes two historic industrial buildings adjacent to Alhambra Blvd and D Street, which were deemed eligible for listing in the CRHR in 2016. The factory site is 56,000 square feet and includes the two historic buildings located at 320 Alhambra Blvd (built in 1926) and 324-350 Alhambra Blvd (originally built in 1935), as well as a series of non-contributing additions **(see Figure 2).** Only the original portions of the two buildings constructed in 1926 and 1935 are considered eligible for listing on the CRHR.

The proposed project would retain 320 Alhambra Blvd, partially demolish the non-contributing additions of 324-350 Alhambra Blvd, and demolish the interiors of 320 and 324-350 Alhambra Blvd. The proposed project includes construction of two (2) new buildings: a six-story, 332-unit apartment complex; and a five-story parking structure. In addition, the project would require the demolition of the four residential properties at 311 30th Street, 315 30th Street, 3000 C Street/301 30th Street (a duplex unit), and 3004 C Street.

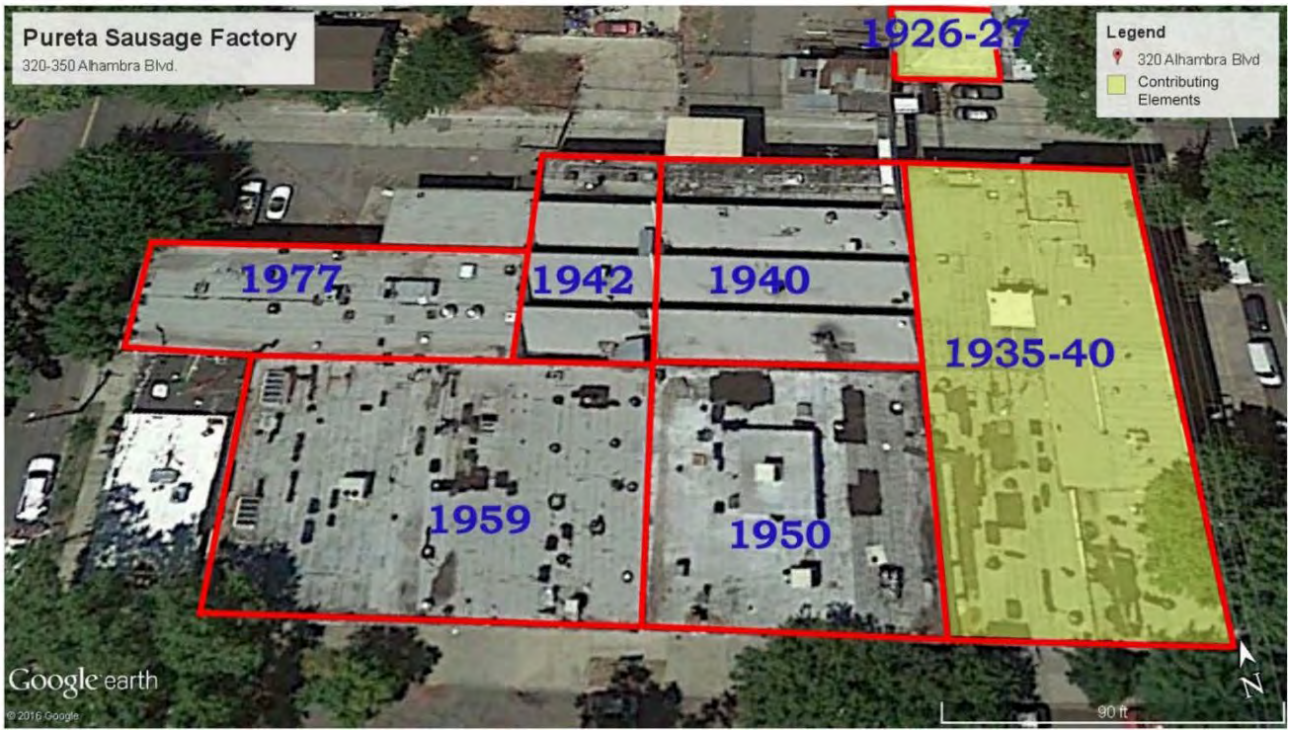

Figure 2: Historic Pureta Factory Sausage Site Chronology, ESA "Pureta Sausage Factory Memorandum," 2022.

Table 1. Summary of Existing and Proposed Buildings/Structures

BUILDING/ STRUCTURE	PROPOSED WORK	AREA TOTAL (SF)
320 Alhambra Blvd - 1926 Pureta Sausage Company Building	Retention of the overall building form, including all façades. Demolition of interior features.	5,836
324-350 Alhambra Blvd – 1935 Pureta Sausage Company Building	Retention of the contributing façades (north, east and south), demolition of the non-contributing west façade and later additions. Demolition of interior features.	74,817
311 30th Street	Demolition	1,086
315 30th Street	Demolition	1,160
3000 C Street/301 30th Street	Demolition	1,325
3004 C Street	Demolition	981
Apartment Complex	Construction of a six-story, 332-unit apartment complex	333,485 SF
Parking Structure	Construction of a five-story parking structure	110,080 SF
	Total New Development	**443,565 SF**

Alterations to the Former Pureta Sausage Factory

The proposed project would result in minimal changes to the character-defining features of the Pureta Sausage Factory buildings. Changes include the demolition of the interior features of both buildings, retention of the overall building envelope and form of 320 Alhambra Blvd, and partial demolition of the non-contributing additions of 324-350 Alhambra as described below. The proposed project is outlined in schematic drawings prepared by HRGA, dated September 25, 2024, and the narrative project description dated August 13, 2024.

Exterior Changes to 320 Alhambra Boulevard (1926 Puerta Sausage Factory Building)

The proposed project would retain all four façades of 320 Alhambra Blvd and demolish the non-contributing interior features. The non-contributing one- and two-story concrete block structure affixed to the southwestern corner of the building in Chinatown Alley would also be demolished. A new interior that houses a fitness studio, yoga studio, and a two-bedroom apartment unit would be constructed.

The east façade along Alhambra Blvd would be retained and the four existing multi-paned metal sash windows would be removed and replaced in-kind.

The south façade would be retained and two existing multi-paned metal sash windows would be replaced in-kind. Two existing doors (a single pedestrian door, and a metal roll-up garage door) would be removed and replaced with a fully-glazed storefront.

The west (rear) façade would be retained and the existing roll-up door would be removed and replaced with a new fully-glazed storefront. Two additional doors and one window would be inserted into the façade.

The north façade would become an interior wall within the addition and would be located between the new fitness studio and residential units. A single interior doorway would be cut into the center of the existing wall to provide access between the interior spaces. The existing pedestrian door at the right side of the north façade would be removed and infilled with brick to match the existing.

A tiered vertical addition ranging from three to five stories would be added to the building. The first tier of the addition (stories 2 through 4) would be set-back 10'-0" from the retained east façade and 25' from the retained south façade to accommodate rooftop patios, and setback 5'-6" from the retained west façade. The building would be setback and additional 37'-0" from the east façade starting at the fifth story.

The materials of the new construction would be a mixture of corrugated metal, a thin brick veneer colored gray to contrast with the adjacent historic red brick, and cement plaster. The new construction would span the length of the retained façades (minus setbacks) and across the entire block, with a courtyard located at the interior of the block.

Exterior Changes to 324-350 Alhambra Boulevard (1935 Pureta Sausage Factory Building)

The proposed project would retain the contributing portion of the south façade, and the north and east façades as detailed below. Non-contributing portions of the north (rear) façade would be demolished, as well as the non-contributing west façade. A new interior that houses a lobby, leasing office, lounge, and coffee and bakery shop on the first story and a mixture of studio, one-bedroom, and two-bedroom apartments on the second floor would be constructed.

The proposed project would retain the contributing, one-story portion of the south façade and one existing multi-paned metal sash window would be replaced in-kind. Two existing doors would be removed and replaced with three fully-glazed storefront windows, which would be located within the existing architectural bays. In order to create the new openings, a portion of historic brick would be removed. The remaining, non-contributing portions of the south façade would be demolished and replaced with a new horizontal and vertical addition. The new construction in this location would be set back from the retained portion of the south façade by 10'.

At the east façade, the existing openings on the ground floor will be removed and replaced with storefronts within the existing architectural bays. The storefronts will be of a high-quality metal material and will have a powder coated or matte finish. Portions of the existing brick would be demolished to accommodate the new openings. The window directly adjacent to the clipped corner entryway at Alhambra Blvd and D Street would be removed and replaced in-kind. The entryway at the clipped corner would be removed and replaced with a fully-glazed entry door and metal-framed storefront windows. A new projecting canopy would be added above this entry. On the second story, all existing multi-paned metal sash windows would be replaced in-kind and their operation would be slightly modified to include an operable section at each window unit to address egress requirements.

The proposed project would retain the contributing one- and two- story portions of the north façade, including three existing multi-paned metal sash windows, which would be replaced in-kind. The two existing roll-up garage doors will be removed and replaced with storefront windows within the existing openings. The remaining, non-contributing portions of the north façade would be demolished and replaced with a new horizontal and vertical addition. The new construction in this location would be set back from the retained portion of the south façade by 10'.

The existing west façade is composed of non-contributing additions added to the building in 1959 and 1977. The proposed project would demolish this façade and replace it with new construction.

A tiered vertical addition ranging from three to five stories would be added to the building. The first tier of the addition (stories 2 through 4) would have a varied set-back ranging from 10' to 13'-6" from the retained east façade, 10' from the retained north façade, and 10'-0" to 12'-7" from the retained south façade. The building would be setback and additional 36'-6" to 38'-11" feet from the east façade starting at the fifth story. The materials of this new construction would be a mixture of corrugated metal, a thin brick veneer colored gray to

contrast with the adjacent historic red brick, and cement plaster. The new construction would span the length of the retained historic façades (minus setbacks) and across the entire block, with a courtyard located at the interior of the block.

Site Improvements

Site improvements include changes in site circulation and landscaping. Chinatown Alley would be abandoned and the eastern end of the alley would be converted into a landscaped walkway leading to two central courtyards and the parking structure at the west side of the block. Additionally, all driveways to the properties on C Street and 30th Street would be removed and replaced with concrete and/or new driveways. The majority of the landscaping associated with the existing residential properties on C Street and 30th Street would be removed.

CEQA Study Area

The CEQA Study Area **(see Figure 3)** was delineated to include all areas where work is proposed, including the known and reasonably anticipated boundaries of historic properties. The CEQA Study Area includes the approximately 2.26-acre property which is composed of eight parcels located within the East Sacramento neighborhood of Sacramento, California: APNs (Assessor's Parcel Number) 003-0112-001 (Parcel 1, 0.07 acres), 003-0112-002 (Parcel 2, 0.07 acres), 003-0112-003 (Parcel 3, 0.07 acres), 003-0112-004 (Parcel 4, 0.07), 003-0112-017 (Parcel 5, 0.07), 003-0112-018 (Parcel 6, 0.59 acres), 003-0112-020 (Parcel 7, 1.03 acres), and 003-0112-021 (Parcel 8, 0.29). The property is bounded by C Street to the north, Alhambra Blvd to the east, D Street to the south, and 30th Street to the west. The commercial parcel (APN 003-0112-015) at the southwest corner of the block is excluded from the proposed project and CEQA Study Area.

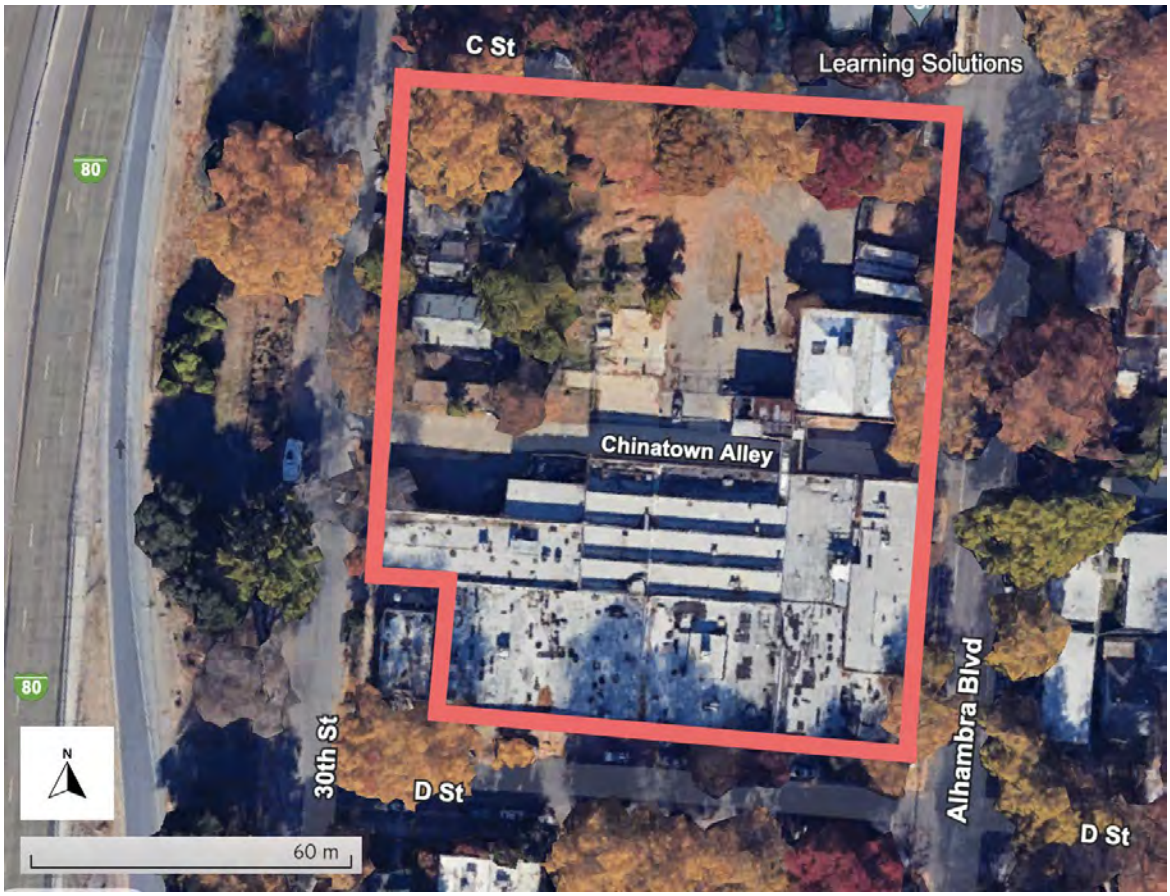

Figure 3: CEQA Study Area, Google Earth, 2024. CEQA study area indicated by red line.

III. Study Methods and Findings

Current Historic Status

The two historic-age industrial buildings located within the CEQA Study Area and associated with the former Pureta Sausage Factory at 320 and 324-350 Alhambra Blvd were evaluated by Historic Environment Consultants in July 2016. Historic Environment Consultants prepared a State of California Department of Parks & Recreation DPR 523 form (DPR form) for the buildings and found that the property was eligible for listing in the CRHR under Criterion 1 for a period of significance 1926 to 1969. Additional analysis was prepared by ESA in June 2022 to confirm the character-defining features of the buildings, which ESA determined to be limited to the oldest portions of the factory built between 1926 and 1935 (see Appendices A and B, and Figure 2). The City of Sacramento concurred with these findings and determined that the 1926 (320 Alhambra Blvd) and 1935 (324-350 Alhambra Blvd) buildings are eligible historical resources under CEQA. This HRE is based on the prior findings by Historic Environment Consultants and ESA and Groundwork did not conduct further evaluation of 320-350 Alhambra Blvd.

The four residential buildings located within the CEQA Study Area (315 30th Street, 311 30th Street, 3000 C Street/301 30th Street, and 3004 C Street) were not previously evaluated for listing in the CRHR. Groundwork evaluated the four residential buildings and determined that none met the criteria for listing in the CRHR and should not be considered historical resources under CEQA.

The findings of these evaluations and historic context sections are summarized below.

Methodology

On July 29, 2024, Ettienne LeFebre, Associate Cultural Resource Historian for Groundwork, visited the site and conducted a pedestrian survey to field verify the presence or absence of historical resources. She observed the existing conditions of the commercial/industrial buildings and additions associated with the former Pureta Sausage Factory, including interior features. The site visit included an updated survey of the commercial/industrial buildings and their surroundings, and exterior survey of the four previously unevaluated residential properties.

Groundwork prepared this report using primary and secondary sources collected at various repositories. Archival research was targeted at local archives and online repositories as needed to obtain information about the development of the properties, historic context, and alterations over time. The following archives were consulted: the City of Sacramento Assessor's Office, Building Department, and City Clerk's Office; the Cartwright Aerial Surveys Collection at UC Santa Barbara; the CSU Sacramento Library; Newspapers.com and Ancestry.com.

The following key technical reports provided background information to inform the evaluation:

Table 2. Previous Historical Resource Studies and Reports in the CEQA Study Area

Author	Date	Report Title
Historic Environment Consultants	July 2016	*DPR-523 Form for 320-350 Alhambra Blvd*
ESA	June 2022	*Pureta Sausage Factory Memorandum*

Historic Context

Early Settlement of East Sacramento

The subject block, which contains two industrial buildings, four residential buildings, and one commercial building, is located in East Sacramento, a residential neighborhood that was annexed by the City of Sacramento in 1911.[1] The Nisenan and Plain Miwok peoples inhabited the region pre-contact, and tended the land through burning, hunting, and plant cultivation. During the Mexican era in 1839, European settlement of what is presently the City of Sacramento began when John Sutter built a fort on land he named New Helvetia. Commercial trade from the Gold Rush brought Americans from the East and people from around the world to Sacramento, and the population rose from 150 in 1849 to 9,087 in 1850.[2] However, the location of the subject property in East Sacramento remained largely undeveloped and agricultural. During the city's early years, the area around William McKinley Park, one block away from the subject property, was a swampy area with a stream known as Burns Slough. During Sacramento's agricultural development the slough became an irrigation canal.[3]

Residential Development in East Sacramento

Residential development began in July 1871 when City Street Railway Company expanded their operations to take people to the easternmost reaches of the city and surrounding agricultural lands. To encourage riders to make the trip east, they founded East Park, which later became McKinley Park, as a 30-acre "suburban place of resort."[4] The park became a popular recreation spot in Sacramento, and in 1902, the city purchased the park from the City Street Railway Company.[5]

During the 1890s, the City Railway Company installed more streetcar lines to promote further residential development, which began around 1905, and the city annexed the area in 1911. However, the land remained largely agricultural until the 1920s.[6] Sanborn Maps of the block of 30th Street from C Street to Chinatown Alley dating to 1915 show the location of the subject property without any buildings. However, surrounding streets

[1] City of Sacramento, "City of Sacramento History of Annexation Activity," November 19, 2013, https://www.cityofsacramento.org/-/media/Corporate/Files/CDD/Planning/Long-Range/New-Growth/annexhist.pdf?la=en.
[2] City of Sacramento Historic Preservation Department, *Sacramento Historic District Plans Final*, City of Sacramento, accessed June 27, 2024, 20.
[3] City of Sacramento Department of Parks and Recreation, "William McKinley Park: 146 Years of History (1871-2017)" Sign, City of Sacramento, 2017, McKinley Park, Sacramento, California, The Historical Marker Database, https://www.hmdb.org/m.asp?m=137570.
[4] City of Sacramento Department of Parks and Recreation, "William McKinley Park: 146 Years of History (1871-2017)" Sign, City of Sacramento, 2017, McKinley Park, Sacramento, California, The Historical Marker Database, https://www.hmdb.org/m.asp?m=137570.
[5] City of Sacramento, *Sacramento Parks Plan 2040: Final Draft Plan May 2024*, prepared by MIG, EMC Research, and UC Davis Center for Regional Change, May 2024, 19, https://www.cityofsacramento.gov/content/dam/portal/ypce/Parks/ppds/Sacramento_Parks_Plan_05172024_WEB.pdf.
[6] Lee M.A. Simpson, "Images of America: East Sacramento," (Charleston: Arcadia Publishing, 2004), 7.

each have several lots with residential dwellings, showing the beginning of development in the area.[7] Residential development increased around McKinley Park and East Sacramento in the 1920s, and this is demonstrated by the development of the subject block through construction of new residential buildings. While larger developers in East Sacramento constructed large tracts all at once, including Charles Wright and Howard Kimbrough with the Fabulous Forties neighborhood, the subject block was developed in piecemeal fashion by individual landowners.

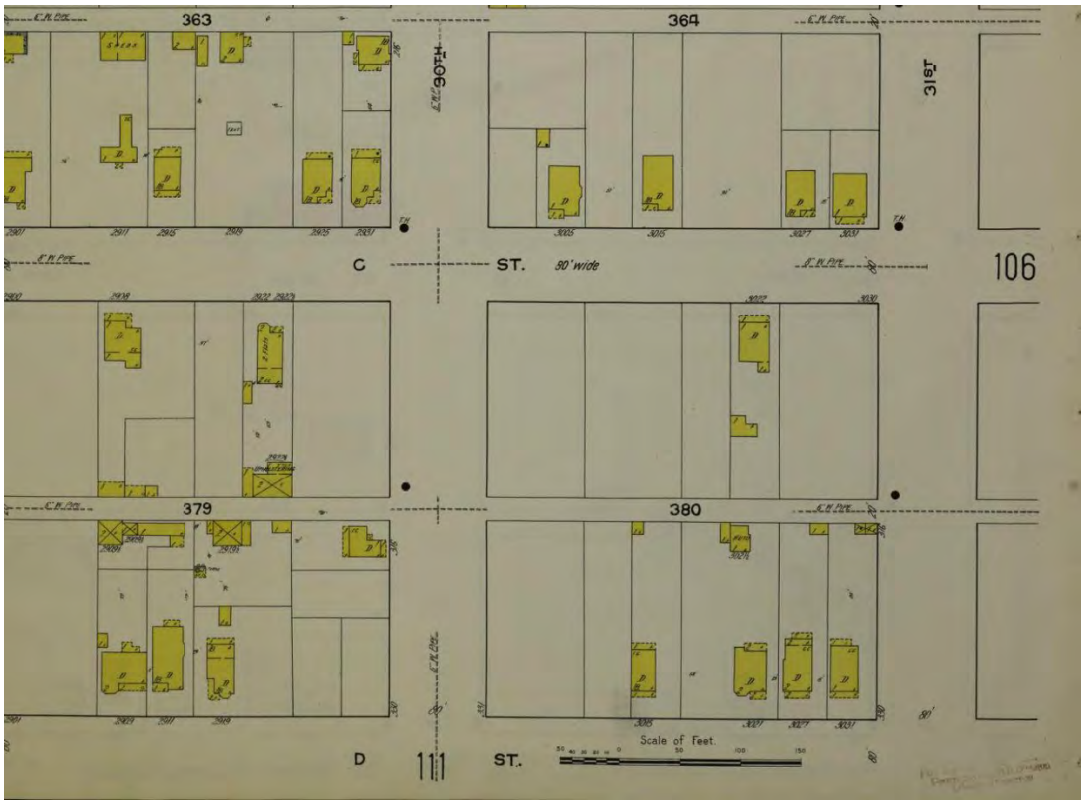

Figure 4: 1915 Sanborn Map of subject block, Library of Congress, http://hdl.loc.gov/loc.gmd/g4364sm.g4364sm_g00799191502.

[7] *Sanborn Fire Insurance Map from Sacramento, Sacramento County, California*, Sanborn Map Company, 1915-DeVol. 2, 1952, Library of Congress, http://hdl.loc.gov/loc.gmd/g4364sm.g4364sm_g00799191502.

Subject Block Site History

Development on the subject block was completed in piecemeal by individual owners and companies in the first decades of the 20th century. According to *The Sacramento Bee*, this was a period of a high volume of building permit applications submitted to the city.[8] Five residential buildings were construction on the subject block by 1915 (see Figure 4 above). By the Fall of 1925, the four one-story, wood-framed Craftsman Bungalows evaluated in this HRE were built.[9]

Development around the subject property remained largely residential, as evidenced by aerial photography of the expansive suburbs in the East Sacramento region in 1928.[10] However, the subject block saw industrial and commercial development with the founding of the Pureta Sausage Company in 1926 on C Street and Alhambra Blvd. Pureta became a highly successful meat-packing company and expanded its operations rapidly from the late-1920s to the 1960s. Pureta erected two brick buildings and several additions to these buildings on the block on either side of Chinatown Alley, altering the residential quality of the subject block and surrounding area. By 1947, the streetcar service that had made East Sacramento possible was discontinued due to the rise of private automobile ownership in the suburbs.[11] By 1962, the Elvas Freeway, originally a one-lane north-south artery that crossed the American River and relieved traffic congestion, was expanded into the six-lane Business Loop 80 highway one block west of the subject block.[12] The installation of the highway destroyed the remaining residential quality of the subject block. However, it also separated the properties from Midtown and Downtown Sacramento, firmly placing them in East Sacramento. By 1961, the area was officially rezoned as a General Commercial/Special Planning District and was advertised as such in newspaper articles.[13]

[8] "$300,000 Permit Valuation In Week's Report," *The Sacramento Bee*, March 21, 1925, Newspapers.com.
[9] "Building Permits," *The Sacramento Union*, April 17, 1925, Newspapers.com.
"Application for Permit to Build," City of Sacramento Building Division, June 17, 1925, Sacramento, CA, City of Sacramento Records Search, https://records.cityofsacramento.org/AdvanceSearch.aspx.
[10] "Flight CAS-201, 1: 14,000 Photograph," Sacramento, CA, March 28, 1928, Cartwright Aerial Surveys Collection, University of California, Santa Barbara Library, Santa Barabara, California, https://mil.library.ucsb.edu/ap_indexes/FrameFinder/.
[11] City of Sacramento Historic Preservation Department, "Sacramento Historic District Plans Final," City of Sacramento, accessed June 27, 2024, 26
[12] "Elvas Freeway Photograph," 1945, Sacramento California, Sacramento Room Photograph Collection, Sacramento Public Library, Sacramento, California, https://sacroom.contentdm.oclc.org/digital/collection/p15248coll1/id/2363.
[13] "Duplex 3000 C Street," *The Sacramento Union*, December 18, 1961, Newspapers.com.

311 30th Street

In February 1922, property owner C.F. Peterson applied for a permit with the City of Sacramento to build a wood-framed house at 311 30th Street.[14] By May 1922, the one-story, wood frame Bungalow was completed, and it was advertised in *The Sacramento Bee*.[15] 311 30th Street has primarily served as a rental property since its construction. For a detailed list of previous owners and occupants of the subject properties, refer to Appendix C.

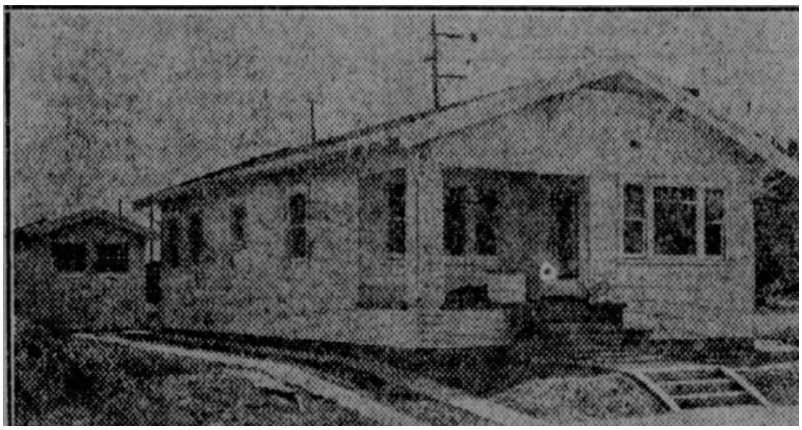

Figure 5: 1922 Photograph of 311 30th Street, *The Sacramento Bee*, Newspapers.com.

3000 C Street/301 30th Street

In 1925, property owner Percy L. Philips applied for a permit with the City of Sacramento to build a wood-framed house at 3000 C Street.[16] In 1933, Philips submitted a building permit to the City of Sacramento, and although the purpose is unknown, it is possible it was to divide 3000 C Street into a two unit duplex, as evidence shows this work was completed by 1933.[17,18] This new unit became 301 30th Street. Since then, the two units have been owned and rented out by various people. Percy L. Philips remained the primary owner and occupant of 3000 C Street until his death in 1952, and his wife Elizabeth remained the owner until 1955. By the 1960s, the duplex was largely rented out by off-site landlords. For a detailed list of previous owners and occupants of the subject properties, refer to Appendix C.

[14] "Application for Permit to Build," City of Sacramento Building Division, February 1, 1922, Sacramento, CA, City of Sacramento Records Search, https://records.cityofsacramento.org/AdvanceSearch.aspx.
[15] "A Classy Home Open For Inspection Sunday," *The Sacramento Bee*, May 6, 1922, Newspapers.com.
[16] "Building Permits," *The Sacramento Union*, April 17, 1925, Newspapers.com.
[17] "Building Division: Building Inspector's Report Card," February 1, 1933, City of Sacramento Building Division, February 1, 1922, Sacramento, CA, City of Sacramento Records Search, https://records.cityofsacramento.org/AdvanceSearch.aspx.
[18] "Percy Phillips," *The Sacramento Union*, November 3, 1952, Newspapers.com.; Polk's Sacramento Directory Co. Publishers, *1955 Sacramento (Sacramento County, Calif.) Directory,* San Francisco, California, 211, City Directories, 1822-1995 Collection, Ancestry.com.

3004 C Street

In March 1925, building contractor Niels H. Lund applied for a permit with the City of Sacramento to build a wood-framed house at 3004 C Street.[19] Since then, the property has had numerous owners, some who lived at the property and some who rented it out to tenants. For a detailed list of previous owners and occupants of the subject properties, refer to Appendix C.

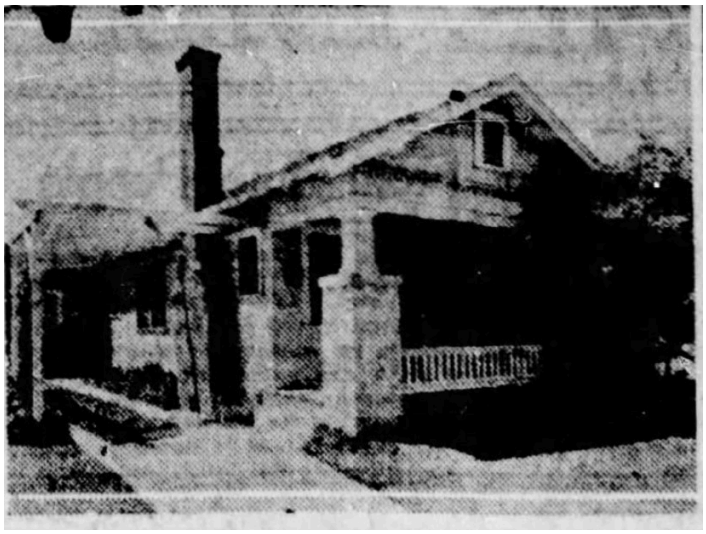

Figure 6: 1925 Photograph of 3004 C Street, *The Sacramento Bee,* Newspapers.com.

315 30th Street

In June 1925, building contractor Burton H. Bill applied for a permit with the City of Sacramento to build a wood-framed house at 315 30th Street.[20] Since then, the property has been owned and rented out by various tenants. In 1982, Gallaghan's Typing Exchange occupied the building, exemplifying the rezoning of the area.[21] However, after 1982, the building was only used as a residential dwelling and either occupied by owners or renters. For a detailed list of previous owners and occupants of the subject properties, refer to Appendix C.

[19] "Building Permits," *The Sacramento Union*, March 13, 1925, Newspapers.com.
[20] "Application for Permit to Build," City of Sacramento Building Division, June 17, 1925, Sacramento, CA, City of Sacramento Records Search, https://records.cityofsacramento.org/AdvanceSearch.aspx.
[21] Polk's Sacramento Directory Co. Publishers, *1982 Sacramento (Sacramento County, Calif.) Directory,* Dallas, Texas, 82, City Directories, 1822-1995 Collection, Ancestry.com.

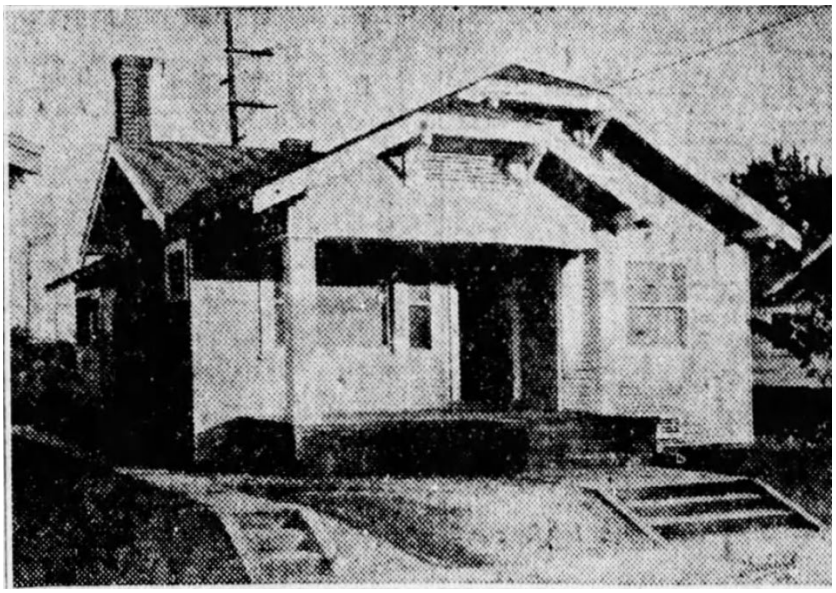

Figure 7: 1925 Photograph of 315 30th Street, *The Sacramento Bee,* Newspapers.com.

The Pureta Sausage Factory, 1926-1969

In 1926, the Pureta Sausage Company was founded by Alfred Zehnder, Joseph Reichmuth, and Herman Zimmerman and built their first factory at 316 (now 320) Alhambra Blvd between C Street and Chinatown Alley. The one-story brick building with a rectangular-shaped plan was built by Holdener Construction Co. and housed both production and a commercial space for the Pureta Sausage Company. The plant opened in early 1927 and quickly became a successful meat-packing and processing plant in Sacramento. By 1931, *The Sacramento Bee* noted that meat-packing and processing ranked third in Sacramento for the industry with the most output, and Pureta was specifically identified as one of the most successful plants in the city.[22]

[22] Historic Environment Consultants, "DPR-523 Form for 320-350 Alhambra Blvd," by Paula Boghosian, July 2016, Sacramento, California, 2.

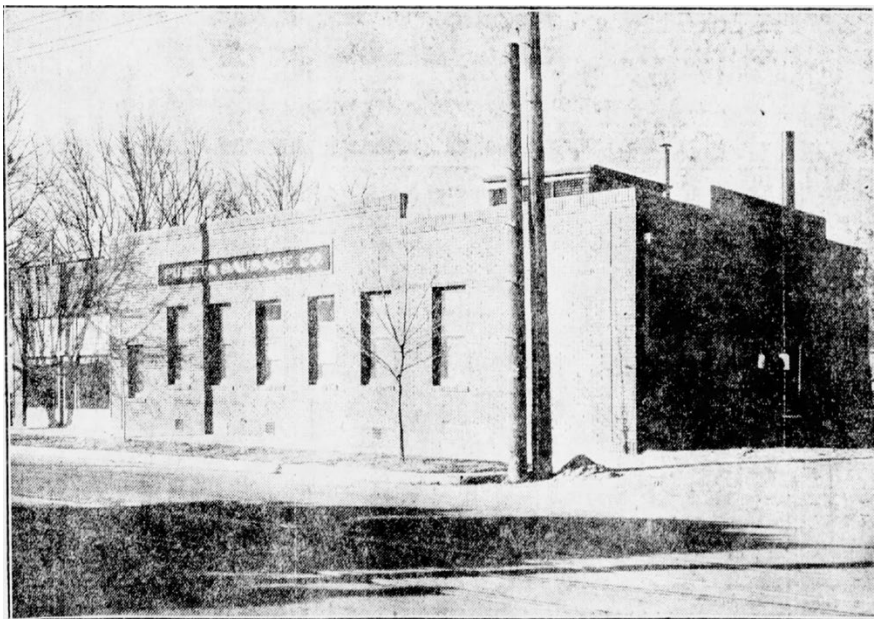

Figure 8: 1927 Photograph of the Pureta Sausage Factory at 316 Alhambra Blvd, *The Sacramento Bee*, Newspapers.com.

Within its first five years, three additions to the plant were built by Holdener Construction Co., all situated across Chinatown Alley between the alley and D Street. A second building at 324-350 Alhambra Blvd was constructed to house these additions, which became a one- and two-story brick building with a rectangular-shaped plan. By 1940, a one-story concrete addition was added to 324-350 Alhambra Blvd along Chinatown Alley, and the Pureta Sausage Factory was described as "...one of the most modern (plants) of its kind on the Pacific Coast."[23] With almost 140 employees during peak season, offices across California, and a growing fleet of refrigerated trucks and sales cars, the company continued to grow in the 1940s. A 13,000 square foot brick and concrete addition was added to the plant in 1942 west of the 1940 addition (see Figure 2).[24]

[23] Historic Environment Consultants, "DPR-523 Form for 320-350 Alhambra Blvd," by Paula Boghosian, July 2016, Sacramento, California, 4.
[24] Historic Environment Consultants, "DPR-523 Form for 320-350 Alhambra Blvd," by Paula Boghosian, July 2016, Sacramento, California, 4.

Figure 9: 1930s Photograph of the Pureta Sausage Factory at 324-350 Alhambra Blvd, Lance Armstrong Collection cited in "DPR-523 Form for 320-350 Alhambra Blvd, July 8, 2016" by Historic Environment Consultants.

By 1950, Sanborn Maps identify the original 1926 building (320 Alhambra) as a garage, the 1935-1940 building (324-350 Alhambra) as containing the cutting room, offices, and cold storage, and the 1940 and 1942 additions as the factory (see **Figure 10**).[25] Growth continued in the 1950s, with two more brick and concrete additions added in 1950 and 1959, and over 200 people being employed during peak season in 1957. By 1963, *The Sacramento Bee* described the company as "…one of the largest and most modern sausage plants on the Pacific Coast" and that it was expanding its market to the San Francisco Bay Area.[26]

[25] *Sanborn Fire Insurance Map from Sacramento, Sacramento County, California*, Sanborn Map Company, 1915-DeVol. 2, 1952, Library of Congress, http://hdl.loc.gov/loc.gmd/g4364sm.g4364sm_g00799191502.
[26] Historic Environment Consultants, "DPR-523 Form for 320-350 Alhambra Blvd," by Paula Boghosian, July 2016, Sacramento, California, 4.

Figure 10: 1950 Sanborn Map of subject block (at right) and surroundings, Library of Congress, http://hdl.loc.gov/loc.gmd/g4364sm.g4364sm_g00799195002.

In April 1964, Hygrade Food Products purchased Pureta to expand the sale of their national line of Ball Park Franks in Northern California. Throughout the late 1960s, Pureta sold the hot dogs under the name "Pureta, Ball Park Franks". In 1969, Hygrade consolidated their production and closed the Sacramento branch of its operations at the Pureta Sausage Factory.[27]

In 1970, Andrew Demas, a well-known Sacramento Greek community member, opened Mary Ann's Bakery in the factory buildings. The bakery became very successful and in 1977 added another addition to the building south of the alley on the west side.[28] In 1974, the original factory building at 320 Alhambra Blvd housed a vintage car restoration shop.[29] From about 1990 to 2009, an American Cancer Society office was located at 350 Alhambra Blvd.[30] A Tea Shop also occupied a space in the building on D Street at an unknown time as

[27] Historic Environment Consultants, "DPR-523 Form for 320-350 Alhambra Blvd," by Paula Boghosian, July 2016, Sacramento, California, 5.
[28] Historic Environment Consultants, "DPR-523 Form for 320-350 Alhambra Blvd," by Paula Boghosian, July 2016, Sacramento, California, 5.
[29] Jim Anderson, "Fact Finder," *The Sacramento Bee*, November 3, 1974, Newspapers.com.
[30] "Health Organizations," *The Sacramento Bee*, May 15, 1990, Newspapers.com.; "Huntsman, Mildred," *The Sacramento Bee*, September 8, 2009.

evidenced by an extant sign affixed to the side of the building. In 2004, the bakery moved to a new location on Power Inn Road and the subject property remained owned by the Demas family.[31]

Figure 11: 1976 Aerial Photograph of the subject block, indicated by red lines (north is up). Cartwright Aerial Survey Collection, UC Santa Barbara Library.

Today, the former Pureta factory buildings are vacant and in poor condition. The four residential buildings, all owned by Demas Enterprises, remain as occupied residential dwellings. Demas Enterprises plans to redevelop the subject block into a six-story, 332-unit apartment complex.

[31] Historic Environment Consultants, "DPR-523 Form for 320-350 Alhambra Blvd," by Paula Boghosian, July 2016, Sacramento, California, 5.

Major Alterations

The original portions of the Pureta Sausage Factory have been minimally altered since their period of significance of 1926-1935. Wood siding was added to a section of the brick wall on the contributing east elevation of 324-350 Alhambra Blvd near the intersection of Alhambra Blvd and Chinatown Alley. Additionally, some minor exterior and interior alterations to 324-350 Alhambra Blvd related to the functions of the meat processing, and later bakery production, were carried out over time. In 1940, the first major non-contributing alteration was made with the construction of the concrete addition on the north façade along Chinatown Alley, connected on the west side of the 1935-1940 building. In 1942, another addition was connected along Chinatown Alley adjoining to the west side of the non-contributing 1940 addition. In 1950, another addition was made on the south façade along D Street and connected to the west side of the 1935-1940 historic building. In 1959, an addition adjoined to the west side of the 1950 addition was constructed along D Street. The most significant alteration was the construction of the addition related to the bakery in 1977 on the north elevation near the intersection of 30th Street and Chinatown Alley (See Figure 2).[32]

Minimal exterior alterations were made to 311 30th Street, 315 30th Street, and 3004 C Street since they were built in the 1920s. All still retain their original form, window and door arrangements, and most of the original materials. Wood and chain link fences have been constructed on all the properties since they were built in the 1920s.

311 30th Street has been minimally altered. The 1922 building permit states that the original shingles on the house were wood, indicating that the property was reroofed at an unknown time.[33] Additionally, one window on the north façade was replaced with a vinyl replacement window at an unknown time.

315 30th Street's main alterations include the replacement of most of the original windows with vinyl replacement windows at an unknown time before 2011.[34] Building permits on file also indicate that the original wood shingles were replaced with composite shingles at an unknown time, and that within the interior of the home the kitchen and electrical system were modified.[35]

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[32] Historic Environment Consultants, "DPR-523 Form for 320-350 Alhambra Blvd," by Paula Boghosian, July 2016, Sacramento, California, 3.

[33] "Application for Permit to Build," February 1, 1922, City of Sacramento Building Division, Sacramento, CA, City of Sacramento Records Search, https://records.cityofsacramento.org/AdvanceSearch.aspx.

[34] "Google Maps Street View of 315 30th Street," Google Maps, August 2011, https://www.google.com/maps/@38.5802807,-121.4634431,3a,75y,84.68h,90.17t/data=!3m7!1e1!3m5!1s03fsBhX8Yvp0vZnmIX7qIg!2e0!5s20110801T000000!7i13312!8i6656?coh=205409&entry=ttu.

[35] "Application for Permit to Build," June 17, 1925, City of Sacramento Building Division, Sacramento, CA, City of Sacramento Records Search, https://records.cityofsacramento.org/AdvanceSearch.aspx.; "Building Division: Building Inspector's Report Card," February 21, 1955, City of Sacramento Building Division, Sacramento, CA, City of Sacramento Records Search, https://records.cityofsacramento.org/AdvanceSearch.aspx.; "Building Division: Building Inspector's Report Card," April 19, 1982, City of Sacramento Building Division, Sacramento, CA, City of Sacramento Records Search, https://records.cityofsacramento.org/AdvanceSearch.aspx.

3004 C Street was also minimally altered. According to city building permits, the only alterations to the property include reroofing in 1979.[36]

The most altered property is 3000 C Street/301 30th Street. Due to the property's configuration and examination of the designs of surrounding residential properties built during the same period, it is likely that the building was originally designed in the Craftsman style and was later stripped of its architectural detailing. Possible alterations include but are not limited to new siding and removal of a shaded porch. The 301 30th Street unit was likely added in 1933 according to building permits and city directories first listing the address that year, meaning the porch and entryway on the south façade were likely added that year. In 1961, termite and rot damage were repaired on the property, which could have altered the façade if it was previously clad in wood siding like the surrounding residential properties. In 1981, electrical repairs were made, and in 1999 the roof cladding was replaced.[37] The windows and doors were replaced between August 2007 and August 2011.[38]

Architectural Descriptions

320 Alhambra Boulevard

320 Alhambra Blvd was the first building constructed on the Pureta Sausage Factory site in 1926. The building is one-story with a flat roof and is located on the north side of Chinatown Alley. The north elevation is a blank brick wall. The east elevation contains a narrow window and four rows of multi-paned metal sash windows, two with 24 lights and two with 36 lights, extending across the elevation beneath a shallow raised section of the roof parapet. The south elevation contains a garage door opening and two multi-pane metal sash windows. A small rectangular concrete block addition constructed at an unknown date is adjoined to the southwest portion of the main historic building. The addition contains two roll-up garage doors, a standard door and two small windows. This is the only structure in the complex not surfaced with brick and appears to be a later addition. A

[36] "Building Division: Building Inspector's Report Card," February 28, 1979, City of Sacramento Building Division, Sacramento, CA, City of Sacramento Records Search, https://records.cityofsacramento.org/AdvanceSearch.aspx.
[37] "Building Division: Building Inspector's Report Card," March 22, 1961, City of Sacramento Building Division, Sacramento, CA, City of Sacramento Records Search, https://records.cityofsacramento.org/AdvanceSearch.aspx.; "Building Division: Building Inspector's Report Card," July 22, 1981, City of Sacramento Building Division, Sacramento, CA, City of Sacramento Records Search, https://records.cityofsacramento.org/AdvanceSearch.aspx.; "Building Division: Building Inspector's Report Card," January 13, 1999, City of Sacramento Building Division, Sacramento, CA, City of Sacramento Records Search, https://records.cityofsacramento.org/AdvanceSearch.aspx.
[38] "Google Maps Street View of 315 30th Street," Google Maps, August 2007, https://www.google.com/maps/@38.5805982,-121.4633536,3a,75y,97.48h,83.32t/data=!3m7!1e1!3m5!1sCsu6SGMms5e77hqAl46PCg!2e0!5s20070801T000000!7i3328!8i1664?coh=205409&entry=ttu.; "Google Maps Street View of 315 30th Street," Google Maps, August 2011, https://www.google.com/maps/@38.5806359,-121.4632694,3a,75y,97.48h,83.32t/data=!3m7!1e1!3m5!1sngQvVos7m4cFaPH98efRpg!2e0!5s20110801T000000!7i13312!8i6656?coh=205409&entry=ttu.

metal enclosed conveyor belt structure extends from the second floor of this building, over the paved alley, and connects to the larger factory/office building to the south.[39]

Figure 12: South façade of 320 Alhambra Blvd, looking north, July 29, 2024.

[39] This architectural description is adapted from Historic Environment Consultants, "DPR-523 Form for 320-350 Alhambra Blvd," by Paula Boghosian, July 2016, Sacramento, California, 1.

Figure 13: East façade of 320 Alhambra Blvd, looking west, July 29, 2024.

Figure 14: North (rear) façade of 320 Alhambra Blvd, looking southeast, July 29, 2024.

Figure 15: West façade of 320 Alhambra Blvd and concrete block addition (at right), looking east, July 29, 2024.

Figure 16: West side of South façade of 320 Alhambra Blvd concrete block addition, looking north, July 29, 2024.

Figure 17: Oblique view of east façade of 320 Alhambra Blvd (right), concrete block addition (center), and north façade of 324-350 Alhambra Blvd (left), looking west, July 29, 2024.

324-350 Alhambra Boulevard

324-350 Alhambra Blvd is a large, mostly brick-faced building located across Chinatown Alley from 320 Alhambra Blvd. Originally constructed in 1935, this building received a series of ground floor additions from ca. 1940 to 1977 (see Figure 2). The 1940 and 1942 additions are located west of the original building along Chinatown Alley. The 1950 addition is located west of the historic building and south of the non-contributing 1940 addition along D Street. The 1959 addition is located west of the 1950 addition and east of the parcel excluded from the project along D Street. The 1977 addition is located north of the 1959 addition and the parcel excluded from the project and west of the 1942 addition along 30th Street.

The north façade of 324-350 Alhambra Blvd is comprised of both the original building and non-contributing additions dating to 1940, 1942, and 1970. The historic building is located on the left side of the façade and the ground floor is massed in red brick that has been painted over. The far-left side is two-stories and clad in stucco on the second story (possibly a later alteration to the original brick). Two industrial metal roll-up garage doors are located on the first story with a metal door located to the right. A corrugated metal awning is affixed to the roofline above the entry door. Two fixed, single pane replacement windows and one double-hung window are located on the second story. Attic vents are visible below the roofline. After the entry door the building steps down to one-story, and the remainder of the building and additions are one story. To the right of the entry door

are three original multi-pane steel sash windows and another metal door. The building massing changes from the original brick massing to concrete block construction after the third window, demarcating where the non-contributing additions. The far-right side of the façade that contains the 1977 addition has a significant set-back to accommodate a loading dock covered with a metal-framed awning. This addition is clad in stucco. Six multi-pane steel sash windows of various sizes, four glass block windows, three metal doors, and three metal roll-up garage doors are located across this façade. Clerestory windows are set-back from the 1940 and 1942 additions and are obscured from the public right-of-way.

The non-contributing west façade is clad in stucco and contains no fenestration. The building on the parcel excluded from the project obscures the right side of this façade.

The south façade is clad in various types of brick representing the various phases of development including the 1950 and 1959 additions. The non-contributing section of the façade (left side) is two stories tall, is clad in red brick; and contains five metal roll-up garage doors of varying sizes, three entry doors, and four windows. Plywood boards are affixed to the doors and windows. A sign that says "Tea Shop" is affixed to the far-right side of this portion of the façade. After this sign the building steps down from two- to one-stories in height, demarcating where the non-contributing additions ends and the original (contributing) building begins on the far-right side of the façade (see Figure 21 below). The contributing building is massed with both red brick and blonde brick, possibly indicating historic infill projects. A parapet wall is located at the roofline on the far-right side of the façade. The façade contains two doors, one window, and one garage door. Plywood boards are affixed to all openings. A clipped entryway is located at the intersection between the historic south and east façades and contains a set of double-doors obscured by plywood boards.

The east façade is entirely contributing and massed in red and blonde brick like the south façade. Wood planks are affixed to the far-right side of the façade on the first story. The first story contains three doors and two windows obscured by plywood boards. A parapet wall is located at the roofline on the left side of the façade, and the middle and right side of the façade steps up from one- to two- stories in height. The second story is massed with red brick and contains nine fixed, single pane replacement windows.

Figure 18: Contributing clipped corner of 324-350 Alhambra Blvd at Alhambra Blvd and D Street, looking northwest, July 29, 2024.

Figure 19: Contributing portion of the south façade, looking west, July 29, 2024.

Figure 20: Contributing portion of the south façade, looking north, July 29, 2024.

Figure 21: South façade (Red arrow indicates the separation between the contributing/historic (right) and non-contributing (left) portions of the façade, looking north, July 29, 2024.

Figure 22: Non-contributing portion of the south façade, looking north, July 29, 2024.

Figure 23: Non-contributing portion of the south and partially-obscured west façades, looking east, July 29, 2024.

Figure 24: Non-contributing west façade, looking east, July 29, 2024.

Figure 25: Non-contributing portion of the north façade, looking southeast, July 29, 2024.

Figure 26: Non-contributing portion of the north façade, looking south, July 29, 2024.

Figure 27: Non-contributing portion of the north façade, looking south, July 29, 2024.

Figure 28: Contributing portion of the north façade, looking south, July 29, 2024.

Figure 29: Contributing east façade, looking west, July 29, 2024.

Figure 30: Contributing east façade, looking north, July 29, 2024.

311 30th Street

The primary façade of 311 30th Street faces west towards Business Loop 80 and a sidewalk directly in front of it. The building is clad in horizontal wood clapboard siding and has a low-pitched, gabled roof with moderate eaves, decorative brackets, and is covered in composite shingles. Attic and basement vents are visible on the upper and lower portion of the primary façade. The primary façade is arranged asymmetrically. On the left side is a recessed wood porch with decorative elements, such as decorative banisters and squared railings. An original wood-framed picture window flanked by two double-hung windows is located on the façade and the entryway is set into the L. On the right side of the façade is a picture window identical to the one under the porch. A straight concrete staircase leads to the porch from the sidewalk.

The south façade faces 315 30th Street. Decorative rafters are located along the roofline. Fenestration includes five windows that are original and wood-framed. Two fixed rectangular windows are located on either side of a brick chimney on the left side of the façade, a picture window identical to the ones on the primary façade is located in the center, and two double-hung windows are located on the right side of the façade. A wood fence separates the back portion of the façade from both the public right of way and the adjacent property.

The rear façade faces a private backyard and beyond a wood fence is the factory property. Decorative brackets and attic vents are located along the roofline. A rear entry-way with a wood door is located on the left side of the façade and is elevated above the ground. A small wood porch and stairs are affixed to the entryway. Two

original, wood-framed double-hung windows are located on the façade, one directly left of the rear entryway and one on the right side of the façade. An original storage shed clad in horizontal wood clapboard siding with a gabled roof is located in the rear.

The north façade faces 3000 C Street/301 30th Street. Decorative rafters are located along the roofline. Two original double-hung windows are located on the far-left side, one double-hung vinyl replacement window and one original fixed square window are located in the center, and one original double-hung window is located on the far-right side. A wood fence with a gate separates the back portion of the façade from both the public right of way and the adjacent property.

Figure 31: Primary façade of 311 30th Street, facing east, July 29, 2024.

Figure 32: South façade of 311 30th Street, facing northeast, July 29, 2024.

Figure 33: Rear façade of 311 30th Street, facing west, July 29, 2024.

Figure 34: North façade of 311 30th Street, facing southwest, July 29, 2024.

3000 C Street/301 30th Street

The primary façade of 301 30th Street/3000 C Street faces north towards C Street. A sidewalk is located directly in front of the building. The building is clad in stucco and has a rectangular plan. The cross-gabled roof is moderately pitched with slight eaves and covered in composite shingles. Attic vents are visible underneath the gable. The façade is arranged asymmetrically. A small concrete porch is located on the left side of the façade and has round metal railing. Fenestration on the porch includes two double-hung, vinyl replacement windows and a wood door covered by a vinyl screen door. The right side of the façade features another entryway with two concrete steps leading up to. Fenestration includes two, double-hung, vinyl replacement windows to the left of a wood door covered by a vinyl screen door, and one large square fixed replacement window. A wood awning with decorative brackets is affixed to the façade above the doorway.

The west façade faces Business Loop 80 and the adjacent sidewalk. Attic and basement vents are located underneath the gable and at the bottom of the façade respectively. The façade features a concrete porch with round metal railing, five double-hung vinyl replacement windows with wood shutters, and a door on the porch obscured by a metal screen door. A small wood awning is affixed to the façade above the door.

The rear façade is partially visible from the public right-of-way and faces south towards 311 30th Street. The far-left side of the façade is visible and features a small stone porch with a wood awning. Fenestration includes a door on the porch that is obscured by a metal screen door. A brick chimney is also located in the rear. A wood fence with a gate obscures the rest of the façade. Behind the fence are two double-hung vinyl

replacement windows and a metal utility box affixed to the façade. A shed clad in horizontal clapboard siding with two swinging doors is located in the rear outside of the fence line.

The east façade faces 3004 C Street. An attic vent and five double-hung vinyl replacement windows are located on the façade. A mix of mature and immature trees and landscaping is located along the property lines.

Figure 35: Primary façade of 3000 C Street/301 30th Street, facing south, July 29, 2024.

Figure 36: West façade of 3000 C Street/301 30th Street, facing east, July 29, 2024.

Figure 37: Portion of rear façade of 3000 C Street/301 30th Street, facing northeast, July 29, 2024.

Figure 38: East façade of 3000 C Street/301 30th Street, facing southwest, July 29, 2024.

3004 C Street

The primary façade of 3004 C Street faces north towards C Street and a sidewalk located directly in front of the building. The building is clad in horizontal wood clapboard siding and has a low-pitched, cross-gabled roof with a dormer, moderate eaves, decorative brackets, and is covered in composite shingles. An attic vent is visible on the upper portion of the primary façade. The primary façade is arranged asymmetrically. On the left side is a recessed wood porch supported by concrete piers with short battered columns on top. It is bordered by short squared railings. Two original wood-framed, double-hung windows flank the centrally located door located within the porch. A picture window is located on the right side of the façade.

The west façade faces 3000 C Street/301 30th Street. An attic vent and three windows are located on the façade. The type and composition of the windows are unknown as they are currently covered by wood panels.

The rear façade faces a private backyard and beyond a wood fence line is 311 30th Street. An attic vent, a door, and four windows are located on the façade. The type and composition of the door and windows are unknown as they are currently covered by wood panels. An original storage shed clad in horizontal wood clapboard siding with a gabled roof and damaged door is located in the rear.

The east façade faces a chain-link fence that separates it and the factory property. A brick chimney and four windows are located on the façade. The type and composition of the windows are unknown as they are currently covered by wood panels

Figure 39: Primary façade of 3004 C Street, facing south, July 29, 2024.

Figure 40: West façade of 3004 C Street, facing east, July 29, 2024.

Figure 41: Rear façade of 3004 C Street, facing north, July 29, 2024.

Figure 42: East façade of 3004 C Street, facing west, July 29, 2024.

315 30th Street

The primary façade of 311 30th Street faces west towards Business Loop 80 and a sidewalk directly in front of it. The building is clad in horizontal wood clapboard siding and has a low-pitched cross-gable-on-hip roof with moderate eaves and is covered in composite shingles. Attic and basement vents are visible on the upper and lower portion of the primary façade. The primary façade is arranged asymmetrically. On the left side is a recessed concrete porch supported by two square columns. A replacement wood-framed cottage window flanked by two double-hung windows with patterned glass panes is located on the façade. The wood entryway door with multiple glass panels and a metal screen door is located to the right of the window. A double-hung vinyl replacement window with a metal window awning affixed to the façade above it is located on the right side of the façade. A straight concrete staircase leads to the porch from the sidewalk.

The south façade faces Chinatown Alley. Fenestration on the façade includes three double-hung, one rectangular fixed, and one sliding vinyl replacement windows. One double-hung window has a metal window awning affixed to the façade above it.

The rear façade faces a private backyard and beyond a wood fence is the factory property. The wood fence has an access gate to the backyard. Fenestration includes one fixed rectangular and three double-hung vinyl

replacement windows and one window of an unknown type and composition covered by wood panels. A small metal storage shed is located in the rear.

The north façade faces a small side yard and a wood fence that separates the building and 311 30th Street. A brick chimney is located on the right side of the façade. One fixed, square window and one window obscured by a wood panel is located on the left side of the façade and three double-hung vinyl replacement windows are located on the right side of the façade. A wood door with a concrete step provides access to the side yard in the center of the façade.

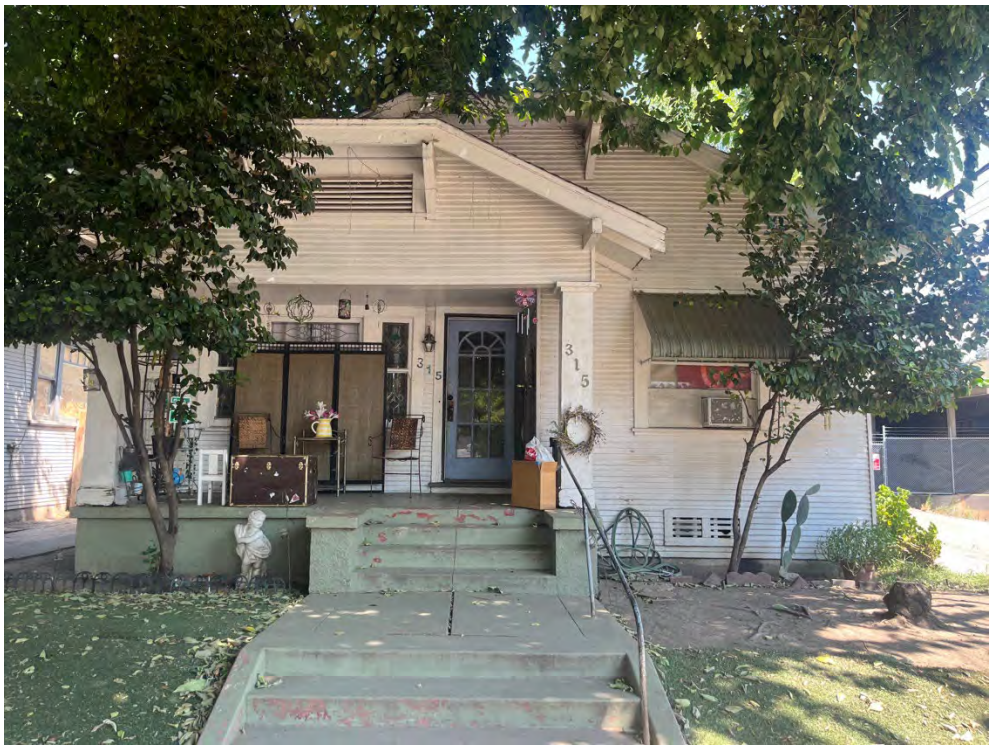

Figure 43: Primary façade of 315 30th Street, facing east, July 29, 2024.

Figure 44: South façade of 315 30th Street, facing north, July 29, 2024.

Figure 45: Rear façade of 315 30th Street, facing west, July 29, 2024.

Figure 46: North façade of 315 30th Street, facing southwest, July 29, 2024.

Evaluation Summary

The following section evaluates historic-age properties located in the CEQA Study Area to determine whether they meet the eligibility criteria for listing in the California Register of Historical Resources (CRHR). Detailed prior evaluations of the Pureta Sausage Factory at 320-350 Alhambra Blvd can be found in Appendices A and B.

In order to be eligible for listing in the CRHR, a property must demonstrate significance under one or more of the following criteria:

- Criterion 1 (Events): Resources that are associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States.
- Criterion 2 (Persons): Resources that are associated with the lives of persons important to local, California, or national history.
- Criterion 3 (Design/Construction): Resources that embody the distinctive characteristics of a type, period, region, or method of construction, or represent the work of a master, or possess high artistic values.
- Criterion 4 (Information Potential): Resources that have yielded, or have the potential to yield, information important to the prehistory or history of the local area, California, or the nation.

320-350 Alhambra Blvd (former Puerta Sausage Factory)

The following evaluation is summarized from the 2016 DPR form evaluation prepared by Paula Boghosian of Historic Environment Consultants and the 2022 Character-Defining Features Memorandum prepared by ESA.

320 and 324-350 Alhambra Blvd, the original Pureta Sausage Factory buildings built in 1926 and 1935, are significant under Criterion 1 for their contributions to the local history of Sacramento, California and Northern California. As a major regional wholesaler, distributor, and manufacturer of processed meats from 1927-1969, the Pureta Sausage Factory served as one of the leading companies in the meatpacking industry in Sacramento. Pureta's regional success positioned it to be purchased by Hygrade Food Products and become a part of the national distribution and popularization of the nationally well-known hot dogs, Ball Park Franks. While the additions after 1940 do not contribute to the historical resource, the two original buildings built between 1926 and1935 exemplify the importance and early success of the Pureta Sausage Factory in Sacramento.

The two original Pureta Sausage Factory buildings at 320 and 324-350 Alhambra Blvd are eligible for listing in the CRHR under Criterion 1 and are considered historical resources under CEQA.

Period of Significance

According to ESA, the period of significance for the buildings associated with the Pureta Sausage Company extends from construction of 320 Alhambra Blvd in 1926 to the first phase of construction of 324-350 Alhambra in 1935. This period covers the initial years of operation of the Pureta Sausage Company as a leading regional business and meat processing plant in Sacramento, California and across Northern California.

Character-Defining Features: 320 Alhambra Boulevard

- Brick construction
- One-story massing
- Parapet wall
- Brick pattern (east façade)
- Six multi-paned metal-framed windows (four on the east façade and two on the south façade)

Character-Defining Features: 324-350 Alhambra Boulevard

- Brick construction
- One- and two-story massing
- Parapet wall
- Brick pattern (east and south façades)
- Clipped corner entry (southeast corner)
- Three, multi-paned, metal framed windows (north façade)

311 30th Street

Criterion 1 (Events)

To be eligible under the events criterion, a property cannot merely be associated with historic events or trends but must have a specific association to be considered significant. The 311 30th Street was constructed in the 1920s and is associated with residential development of East Sacramento in the early 20th century. Although the property was constructed as part of a community-wide need to provide housing for growing East Sacramento at the time, the property does not stand out singularly within this context. Research did not uncover any other important events or associations at the property with the development of East Sacramento in the 20th century. Therefore, 311 30th Street is not eligible for listing in the CRHR under Criterion 1.

Criterion 2 (Persons)

311 30th Street does not appear to be associated with the lives of persons important to local, California, or national history. To be found eligible under Criterion 2, the property must be directly tied to a historically important person and the place where the individual conducted or produced the work for which he or she is known. Research on the builder, property owners, and occupants revealed no historically significant persons associated with the property. 311 30th Street is not eligible for listing in the CRHR under Criterion 2.

Criterion 3 (Design/Construction)

To be eligible under Criterion 3, the property must represent the work of a master, embody the distinctive characteristics of a type, period, region, or method of construction, or possess high artistic values. While builder Burton H. Bill was a professional building contractor based in Sacramento for many years, research did not reveal any information to suggest he made significant contributions to the architecture of Sacramento or elsewhere.

The subject building was constructed in 1922 in a Craftsman Bungalow style, which was widely applied by architects and builders for residential buildings across California and the United States in the early twentieth century. 311 30th Street has minimal architectural features characteristic of the Craftsman Bungalow Style, limited to a low-pitched roof, a front porch with minimal ornamentation, wood siding, and brick materials that are not distinctive in their architectural design. Overall, 311 30th Street is a moderate examples of Craftsman Bungalow style architecture and does not embody the characteristics of a particular type, period, region, or method of construction. Considering all of these factors, the subject property is not eligible for listing in the CRHR under Criterion 3.

Criterion 4 (Information Potential)

311 30th Street is not significant under Criterion 4, which most commonly apply to archaeological resources. Where buildings or architectural elements are concerned, Criterion 4 typically relates to rare construction

types, of which the subject properties are not examples. For this reason, the subject building is not eligible under CRHR Criterion 4.

Finding

311 30th Street is not significant under any of the CRHR criteria and is not an eligible historical resource under CEQA.

3000 C Street/301 30th Street

Criterion 1 (Events)

To be eligible under the events criterion, a property cannot merely be associated with historic events or trends but must have a specific association to be considered significant. The 3000 C Street/301 30th Street was constructed in the 1920s and is associated with residential development of East Sacramento in the early 20th century. Although the property was constructed as part of a community-wide need to provide housing for growing East Sacramento at the time, the property does not stand out singularly within this context. Research did not uncover any other important events or associations at the property with the development of East Sacramento in the 20th century. Therefore, 3000 C Street/301 30th Street is not eligible for listing in the CRHR under Criterion 1.

Criterion 2 (Persons)

3000 C Street/301 30th Street does not appear to be associated with the lives of persons important to local, California, or national history. To be found eligible under Criterion 2, the property must be directly tied to a historically important person and the place where the individual conducted or produced the work for which he or she is known. Research on the builder, property owners, and occupants revealed no historically significant persons associated with the property. 3000 C Street/301 30th Street is not eligible for listing in the CRHR under Criterion 2.

Criterion 3 (Design/Construction)

To be eligible under Criterion 3, the property must represent the work of a master, embody the distinctive characteristics of a type, period, region, or method of construction, or possess high artistic values. There is no evidence that Percy L. Philips, builder of 3000 C Street/301 30th Street, built any other buildings in his lifetime and was likely an amateur and would not be considered a master architect or builder.

The subject building was constructed in 1925, likely in a Craftsman Bungalow style, which was widely applied by architects and builders for residential buildings across California and the United States in the early twentieth century. 3000 C Street/301 30th Street is stripped of all of its architectural detailing and does not embody the characteristics of a particular type, period, region, or method of construction. Considering these factors, the subject property is not eligible for listing in the CRHR under Criterion 3.

Criterion 4 (Information Potential)

3000 C Street/301 30th Street is not significant under Criterion 4, which most commonly apply to archaeological resources. Where buildings or architectural elements are concerned, Criterion 4 typically relates to rare construction types, of which the subject properties are not examples. For this reason, the subject building is not eligible under CRHR Criterion 4.

Finding

3000 C Street is not significant under any of the CRHR criteria and is not an eligible historical resource under CEQA.

3004 C Street

Criterion 1 (Events)

To be eligible under the events criterion, a property cannot merely be associated with historic events or trends but must have a specific association to be considered significant. The 3004 C Street was constructed in the 1920s and is associated with residential development of East Sacramento in the early 20th century. Although the property was constructed as part of a community-wide need to provide housing for growing East Sacramento at the time, the property does not stand out singularly within this context. Research did not uncover any other important events or associations at the property with the development of East Sacramento in the 20th century. Therefore, 3004 C Street is not eligible for listing in the CRHR under Criterion 1.

Criterion 2 (Persons)

3004 C Street does not appear to be associated with the lives of persons important to local, California, or national history. To be found eligible under Criterion 2, the property must be directly tied to a historically important person and the place where the individual conducted or produced the work for which he or she is known. Research on the builder, property owners, and occupants revealed no historically significant persons associated with the property. 3004 C Street is not eligible for listing in the CRHR under Criterion 2.

Criterion 3 (Design/Construction)

To be eligible under Criterion 3, the property must represent the work of a master, embody the distinctive characteristics of a type, period, region, or method of construction, or possess high artistic values. While builder Niels H. Lund was a professional building contractor based in Sacramento for many years, research did not reveal any information to suggest he made significant contributions to the architecture of Sacramento or elsewhere.

The subject building was constructed in 1925 in a Craftsman Bungalow style, which was widely applied by architects and builders for residential buildings across California and the United States in the early twentieth century. 3004 C Street has minimal architectural features characteristic of the Craftsman Bungalow Style,

limited to a low-pitched roof, a front porch with moderate ornamentation, wood siding, and brick materials that are not distinctive in their architectural design. Overall, 3004 C Street is a moderate examples of Craftsman Bungalow style architecture and does not embody the characteristics of a particular type, period, region, or method of construction. Considering all of these factors, the subject property is not eligible for listing in the CRHR under Criterion 3.

Criterion 4 (Information Potential)

3004 C Street/301 30th Street is not significant under Criterion 4, which most commonly apply to archaeological resources. Where buildings or architectural elements are concerned, Criterion 4 typically relates to rare construction types, of which the subject properties are not examples. For this reason, the subject building is not eligible under CRHR Criterion 4.

Finding

3004 C Street is not significant under any of the CRHR criteria and is not an eligible historical resource under CEQA.

315 30th Street

Criterion 1 (Events)

To be eligible under the events criterion, a property cannot merely be associated with historic events or trends but must have a specific association to be considered significant. The 315 30th Street was constructed in the 1920s and is associated with residential development of East Sacramento in the early 20th century. Although the property was constructed as part of a community-wide need to provide housing for growing East Sacramento at the time, the property does not stand out singularly within this context. Research did not uncover any other important events or associations at the property with the development of East Sacramento in the 20th century. Therefore, 315 30th Street is not eligible for listing in the CRHR under Criterion 1.

Criterion 2 (Persons)

315 30th Street does not appear to be associated with the lives of persons important to local, California, or national history. To be found eligible under Criterion 2, the property must be directly tied to a historically important person and the place where the individual conducted or produced the work for which he or she is known. Research on the builder, property owners, and occupants revealed no historically significant persons associated with the property. 315 30th Street is not eligible for listing in the CRHR under Criterion 2.

Criterion 3 (Design/Construction)

To be eligible under Criterion 3, the property must represent the work of a master, embody the distinctive characteristics of a type, period, region, or method of construction, or possess high artistic values. There is no

evidence that C.F. Peterson, builder of 315 30th Street, built any other buildings in his lifetime and was likely an amateur and would not be considered a master architect or builder.

The subject building was constructed in 1925 in a Craftsman Bungalow style, which was widely applied by architects and builders for residential buildings across California and the United States in the early twentieth century. 315 30th Street has minimal architectural features characteristic of the Craftsman Bungalow Style, limited to a low-pitched roof, a front porch with minimal ornamentation, wood siding, and brick materials that are not distinctive in their architectural design. Overall, 315 30th Street is a moderate examples of Craftsman Bungalow style architecture and does not embody the characteristics of a particular type, period, region, or method of construction. Considering all of these factors, the subject property is not eligible for listing in the CRHR under Criterion 3.

Criterion 4 (Information Potential)

315 30th Street is not significant under Criterion 4, which most commonly apply to archaeological resources. Where buildings or architectural elements are concerned, Criterion 4 typically relates to rare construction types, of which the subject properties are not examples. For this reason, the subject building is not eligible under CRHR Criterion 4.

Finding

315 30th Street is not significant under any of the CRHR criteria and is not an eligible historical resource under CEQA.

Evaluation Summary

The two historic Pureta Sausage Factory buildings at 320 Alhambra Blvd and 324-350 Alhambra Blvd were determined eligible for listing on the CRHR under Criterion 1 due to the company's significance as a major regional wholesaler, distributor, and manufacturer of processed meats in Sacramento and the Northern California region. The period of significance extends from 1926, when the factory building at 320 Alhambra Blvd was constructed, to 1935 when the first phase of construction was completed for 324-350 Alhambra Blvd. The building additions after 1940 do not contribute to the historical resource and only the two original Pureta Sausage Factory buildings built in 1926 and 1935 exemplify the region's agribusiness evolution and history. Therefore, the buildings are considered historical resources under CEQA

The four residential buildings at 311 30th Street, 315 30th Street, 3000 C Street/301 30th Street, and 3004 C Street are ineligible for listing in the CRHR due to lack of historical significance under the evaluative criteria. Therefore, the buildings should not be considered historical resources for the purposes of environmental review under CEQA.

IV. Project Analysis

The following schematic design plans, project description, and related project information were reviewed and analyzed for the project analysis below.

Table 3. Project Information

Author	Date	Report Title
HRGA	September 24, 2024	*Alhambra Redevelopment Architectural Plans, 324 Alhambra Blvd.*
HRGA	August 13, 2024	*Project Narratives – Alhambra Redevelopment*

Secretary of the Interior's Standards Analysis

The *Secretary of the Interior's Standards for Rehabilitation* (Standards) provide guidance for reviewing proposed work on historic properties, with the stated goal of making possible "a compatible use for a property through repair, alterations, and additions while preserving those portions or features that convey its historical, cultural, or architectural values."[40] The Standards were published and codified as 36 Code of Federal Regulations 68 in 1995 and updated in 2017 and are used by federal agencies when evaluating work on historic properties. The Standards have also been adopted by local governments across the country, including the City of Sacramento, when reviewing proposed rehabilitation work on historic properties under local preservation ordinances. The Standards are a useful analytic tool for understanding and describing the potential impacts of substantial changes to historical resources. The rehabilitation standards are as follows:

> Rehabilitation Standard 1: A property will be used as it was historically or be given a new use that requires minimal change to its distinctive materials, features, spaces, and spatial relationships.
>
> Rehabilitation Standard 2: The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features, spaces, and spatial relationships that characterize the property will be avoided.
>
> Rehabilitation Standard 3: Each property will be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features or elements from other historical properties, will not be undertaken.
>
> Rehabilitation Standard 4: Changes to a property that have acquired significance in their own right will be retained and preserved.

[40] National Park Service, Department of the Interior, Technical Preservation Services, Rehabilitation as a Treatment, published online at https://www.nps.gov/tps/standards/four-treatments/treatment-rehabilitation.htm.

Rehabilitation Standard 5: Distinctive materials, features, finishes and construction techniques or examples of craftsmanship that characterize a property will be preserved.

Rehabilitation Standard 6: Deteriorated historic features will be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature will match the old in design, color, texture, and, where possible, materials. Replacement of missing features will be substantiated by documentary and physical evidence.

Rehabilitation Standard 7: Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.

Rehabilitation Standard 8: Archeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.

Rehabilitation Standard 9: New additions, exterior alterations, or related construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work shall be differentiated from the old and compatible with the historic materials, features, sizes, scales, proportions, and massing to protect the integrity of the property and environment.

Rehabilitation Standard 10: New additions and adjacent or related new construction will be undertaken in such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

Conformance with the rehabilitation standards does not determine whether a project would cause a substantial adverse change in the significance of a historical resource under CEQA. Rather, projects that comply with the standards benefit from a regulatory presumption that they would have a less-than significant impact on a historic resource. Projects that do not comply with the rehabilitation standards may or may not cause a substantial adverse change in the significance of a historic resource and would require further analysis to determine whether the historic resource would be "materially impaired" by the project under CEQA Guidelines section 15064.5(b).

Standards Analysis

To comply with the Standards, a project needs to retain a majority of its essential features such that the property can continue to convey its significance after implementation of the proposed project. The proposed project complies with the Standards as outlined below.

The character-defining features of the historical resources have been identified as follows:

Character-Defining Features: 320 Alhambra Boulevard

- Brick construction

- One-story massing
- Parapet wall
- Brick pattern (east façade)
- Six multi-paned metal-framed windows (four on the east façade and two on the south façade)

Character-Defining Features: 324-350 Alhambra Boulevard

- Brick construction
- One- and two-story massing
- Parapet wall
- Brick pattern (east and south façades)
- Clipped corner entry (southeast corner)
- Three, multi-paned, metal framed windows (north façade)

Rehabilitation Standard 1: A property will be used as it was historically or be given a new use that requires minimal change to its distinctive materials, features, spaces, and spatial relationships.

Currently, the buildings at 320 and 324-350 Alhambra Blvd are vacant. Formerly the buildings were used as an industrial factory for the Puerta Sausage Factory and later the Mary Ann Bakery. The rehabilitation of 320 and 324-250 Alhambra Blvd would convert the buildings from their former industrial use to residential use. To accommodate this change in use, interior features would be demolished and exterior character-defining features would be retained (including the exterior walls and brick cladding, and overall building form). Overall, the change in use will minimally alter the distinctive materials, features, spaces, and spatial relationships that characterize the property. Therefore, the proposed project complies with Standard 1.

Rehabilitation Standard 2: The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features, spaces, and spatial relationships that characterize the property will be avoided.

The proposed project would result in minimal changes to the distinctive materials, features, spaces and spatial relationships that characterize the property. At 320 Alhambra Blvd, all of the character-defining features would be retained or replaced in-kind. Small sections of brick cladding would be removed on secondary façades to accommodate new window and door openings and the multi-pane steel-sash windows will be replaced in-kind. At 324-250 Alhambra Blvd, the contributing façades will be retained (including portions of the south and north façades, and the entire east façade) and non-contributing additions will be demolished (non-contributing portions of the south and north façades, and the entire west façade). 324-250 Alhambra Blvd has experienced many alterations and additions over time, and the retention of the contributing façades will allow the building to continue to be understood as an industrial factory associated with the early era of the Pureta Sausage Company, and the buildings' relationship to the subject block and surrounding neighborhood. Therefore, the proposed project complies with Standard 2.

Rehabilitation Standard 3: Each property will be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features or elements from other historical properties, will not be undertaken.

The proposed project will retain the character-defining exterior features of the historic buildings while also introducing adjacent new construction through a series of vertical and horizontal additions. The additions are sufficiently set back from the historic building façades to ensure that the retained historic buildings read as one- to two-stories in height and the materials of the additions are differentiated such that they will read as contemporary elements. The existing multi-pane metal-sash windows will be replaced in-kind and based on careful documentation of the existing window dimensions. The proposed project does not include conjectural elements from other historic properties and the historic buildings will continue to be understood as an industrial factory associated with the Pureta Sausage Company. Therefore, the proposed project complies with Standard 3.

Rehabilitation Standard 4: Changes to a property that have acquired significance in their own right will be retained and preserved.

A study conducted by ESA determined that the additions to 320 and 324-350 Alhambra Blvd do not contribute to the historic buildings. Therefore, none of the addiction to the historic buildings have acquired significance in their own right and their removal will not alter the property's ability to convey its significance. Therefore, the proposed project complies with Standard 4.

Rehabilitation Standard 5: Distinctive materials, features, finishes and construction techniques or examples of craftsmanship that characterize a property will be preserved.

The proposed project will retain the majority of the historic brick cladding and require removal of small areas of brick to accommodate new window and doors openings. The current window and door openings on the ground story of 320 and 324-250 Alhambra Blvd are boarded up and insufficient to provide the required egress for the residential and service functions of the new construction. Overall, these changes are minimal to the distinctive materials, features and finishes that characterize the building and essential for the adaptive reuse of the building. Therefore, the proposed project complies with Standard 5.

Rehabilitation Standard 6: Deteriorated historic features will be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature will match the old in design, color, texture, and, where possible, materials. Replacement of missing features will be substantiated by documentary and physical evidence.

The proposed project will retain the building façades and select areas of the character-defining brick cladding will be removed to accommodate new window and door openings. The character-defining multi-pane steel-sash windows have deteriorated and the project sponsor has chosen to replace the windows in-kind. The replacement windows will be custom-made of metal and based on careful documentation of the existing

window dimensions to ensure that they match the existing in design, color, material, and texture. Therefore, the proposed project complies with Standard 6.

Rehabilitation Standard 7: Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.

It is not anticipated that the proposed project would require abrasive chemical or physical treatments that have the potential to damage the building's historic materials. Therefore, the proposed project complies with Standard 7.

Rehabilitation Standard 8: Archeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.

It is possible that excavation required for the new construction on the site would have the potential to disturb archaeological resources. However, the IS/MND will outline standard accidental discovery protocols and other measures to ensure that archeological resources are protected during construction. Therefore, the proposed project complies with Standard 8.

Rehabilitation Standard 9: New additions, exterior alterations, or related construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work shall be differentiated from the old and compatible with the historic materials, features, sizes, scales, proportions, and massing to protect the integrity of the property and environment.

The new additions included in the proposed project have been designed with generous setbacks from the retained historic buildings and new construction will be set back a minimum 10' from primary retained façades and 5'6" from secondary retained façades at the ground floor. The tiered vertical additions include a substantial set back of 37' starting at the 5th story. The design of the additions ensures that they read as separate and contemporary elements from the historic buildings.

The horizontal addition at the south and west façades of 324-350 Alhambra Blvd will be clad in gray brick veneer that references the adjacent historic red brick material but will be visually differentiated as new construction. The materials of the vertical additions of 320 and 324-350 Alhambra Blvd will be a neutral palette of corrugated metal and cement plaster that references the industrial character of the historic buildings, while also reading as contemporary construction. The material changes of the vertical additions also help to visually break up the massing of the new construction. As described above, the proposed project complies with Standard 9.

Rehabilitation Standard 10: New additions and adjacent or related new construction will be undertaken in such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired

The proposed vertical alterations to 320 and 324-350 Alhambra Blvd are not reasonably reversible, as a new six-story building would be constructed above the retained historic buildings. The additions are set back sufficiently from the historic buildings to allow them to read as separate elements from the new construction. The construction of the upper-story and rear additions would require the removal of portions of both building's historic roof planes and the non-contributing west façade of 324-350 Alhambra Blvd. In the unlikely event that the vertical and horizonal additions were removed in the future, the overall form and integrity of 320 Alhambra and the contributing portions of 324-350 Alhambra Blvd would be retained. As such, the project complies with Standard 10.

Summary

Overall, the project retains the majority of the character-defining features of 320 and 324-350 Alhambra Blvd and complies with the Standards. As currently proposed, the project complies with Standards 1 through 10.

CEQA Analysis

Project-Specific Impacts

This section analyzes impacts related to historical resources for the proposed project. It describes the methods used to determine the impacts of the proposed project and lists the criteria used to conclude whether an impact would be significant. The applicable regulation for the proposed project with regards to effects to historic properties is contained in the CEQA Guidelines 15064.5(b):

> (b) A project with an effect 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.
>
> > (1) A substantial adverse change in the significance of an historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired.

The significance of a historical resource is materially impaired if a project demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that justify its inclusion in, or eligibility for, the CRHR, and/or a local register of historical resources (CEQA Guidelines 15064.5(b)(2)(A-C)). Adverse effects shall be considered mitigated to a level of less-than a significant impact for historical resources if a project follows the *Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings* (Grimmer and Weeks 1995).

Impact Evaluation

This HRE identified two historical resources in the CEQA Study Area, the original buildings associated with the former Pureta Sausage Factory at 320 and 324-250 Alhambra Blvd. These buildings were previously determined to be eligible for listing in the CRHR under Criterion 1 for their association with the Pureta Sausage Co., a major regional wholesaler, distributor, and manufacturer of processed meats in Sacramento and the

greater regional, as a vital component of the region's business evolution and history during the period of significance from 1926 to 1935.

The proposed project would retain the majority of the character-defining features of the former Pureta Sausage Factory at 320 and 324-350 Alhambra Blvd to accommodate new residential construction. Per the analysis above, the proposed project complies with the Standards. The project as currently proposed would not cause a substantial adverse change in the significance of the historical resource as defined in CEQA Guidelines section 15064.5 and the buildings would be able to convey their significance under Criterion 1 after implementation of the proposed project. Based on the information presented in this document and in applying CEQA Guidelines 15064.5(b), Groundwork finds that the proposed project would result in a Less-Than-Significant Impact on historical resources.

V. References

ESA. "Pureta Sausage Factory Memorandum," by Amber Grady. Sacramento, California, June 28, 2022.

Historic Environment Consultants. "DPR-523 Form for 320-350 Alhambra Blvd," by Paula Boghosian. Sacramento, California, July 2016.

HRGA. "Alhambra Redevelopment: 324 Alhambra Boulevard." Sacramento, California, September 25, 2024.

HRGA. "Project Narratives – Alhambra Redevelopment." August 13, 2024.

VI. Preparers' Qualifications

Gretchen Hilyard Boyce (B.A. Architectural History, University of Virginia; M.S. Historic Preservation, University of Pennsylvania) is a Principal Cultural Resource Specialist with Groundwork Preservation LLC and meets the *Secretary of the Interior's Professional Qualifications Standards* for Architectural History and History. Ms. Boyce has over 20 years of specialized experience in architectural history, historic preservation, and cultural landscapes. Ms. Boyce's work has focused on California Environmental Quality Act (CEQA), National Environmental Policy Act (NEPA), National Register, and NHPA Section 106 cultural resources assessments throughout California.

Ettienne LeFebre is an Associate Cultural Resources Historian with Groundwork Preservation LLC. She holds a master's degree in public history from Sacramento State University, with a focus in historic preservation and cultural resources management, and a bachelor's degree in History from Sacramento State University.

VII. Appendices

- **Appendix A**: State of California, Department of Parks and Recreation Form prepared by Historic Environment Consultants for 320-350 Alhambra, Blvd, Sacramento, CA. July 2016.
- **Appendix B:** Pureta Sausage Factory and Distribution (320-350 Alhambra Blvd), Character-Defining Features Memo prepared by ESA, June 28, 2022.
- **Appendix C:** Owner/Occupant Tables

Appendix A: State of California, Department of Parks and Recreation Form prepared by Historic Environment Consultants for 320-350 Alhambra, Blvd, Sacramento, CA. July 2016.

State of California — The Resources Agency
DEPARTMENT OF PARKS AND RECREATION

PRIMARY RECORD

Primary #_____
HRI #_____
Trinomial_____
NRHP Status Code_____
Other Listings_____
Review Code_____ Reviewer_____ Date_____

Page 1 **of** 8 **Resource Name or #:** 320-350 Alhambra Blvd.
P1. Other Identifier: Pureta Suasage Factory and Distribution
***P2. Location: *a. County:** Sacramento
b. Address: **City:** Sacramento **Zip:** 95816
***c. USGS 7.5' Quad** Sacramento West **Date:** 1992
***e. Other Locational Data: APN#:** 003-0112-021, 017, 018, 020
***P3a. Description:**

The property includes lots 2, 3, 4, 5, 6, 7, and the northeastern three quarters of lot 8 on the block surrounded by Alhambra, 30th, C and D Streets. The buildings on these lots are one and two stories, surfaced with textured brick, and cumulative. Two wood frame houses located on the south half of lot 1 are included in the proposed project but evaluated on their respective 523 forms.

The first building on the site was the one story flat-roofed rectangle on the north side of the alley that bisects the two major structures on the property, built in 1926. The north elevation is a blank brick wall. The east elevation contains a narrow window and four banks of multi-paned metal sash windows, two with 24 lights and two with 36 lights, extending across the elevation beneath a shallow raised section of the roof parapet. The south elevation of this building contains a garage door opening and two multi-paned metal frame windows. A small brick-surfaced wing projects at right angles at one story height to the southern and a rectangular concrete block rises above it to the west. This one and two story concrete and concrete block structure contains one tall and one standard height roll up garage-type doors, a standard door and two small windows. This is the only structure in the complex not surfaced with brick, and is apparently not original. A metal-enclosed conveyor belt structure extends from the second floor of this building, over the paved alley, to the larger factory/office building to the south.

(Please see Continuation sheet)

***P3b. Resource Attributes:** HP8
***P4. Resources Present:** ■Building ☐Structure ☐Object ☐Site ☐District ☐Element of District ☐Other (Isolates, etc.)

P5b. Description of Photo: View to the northwest
***P6. Date Constructed/Age and Source:** ■Historic ☐Prehistoric ☐Both
1926-27
***P7. Owner and Address:**

Sacramento, CA
***P8. Recorded by:**
Paula Boghosian, Historic Environment Consultants
5420 Home Court
Carmichael, CA 95608
***P9. Date Recorded:**
July 2016
***P10. Survey Type:**
Intensive
P11. Report Citation*: none

***Attachments:** ☐NONE ☐
Location Map ☐Sketch Map ☐Continuation Sheet ■Building, Structure, and Object Record
☐Linear Resource Record ☐Archaeological Record ☐District Record ☐Milling Station Record ☐Rock Art Record
☐Artifact Record ☐Photograph Record ☐ Other (List)

*These items consist of required information.

BUILDING, STRUCTURE, AND OBJECT RECORD

 ***NRHP Status Code:** 5S2

***Resource Address:** 320-350 Alhambra Blvd

B1. Historic Name: Pureta Sausage

B2. Common Name: Maryann's Bakery

B3. Original Use: Sausage manufacture/distribution **B4. Present Use:** Vacant

***B5. Architectural Style:** vernacular light industrial/commercial

***B6. Construction History:** The first building of the complex was built in 1926, on the north side of the paved alley. There were three additions to the plant in its first five years. By the late 1930s the company occupied the east ¼ of the property on the south side of the alley. By 1941 the company was starting its seventh addition. An estimate of the major stages of construction is on the map on page 6. The many smaller stages are hard to discern.

***B7. Moved?** ■**No** □**Yes** □**Unknown** **Date:** **Original Location:**

***B8. Related Features:** The property is comprised of two elements; the freestanding earliest building, and a nearby expanded structure comprised of six buildings. There are two house on the north side of the alley on 30th Street.

B9a. Architect: unknown **b. Builder:** Holdener Construction Co. did most of the additions between 1940-1965

***B10. Significance: Theme:** Agribusiness/meat packing and processing **Area:** East Sacramento

Period of Significance: 1927-1969 **Property Type: industrial, commercial** **Applicable Criteria:** A, i: events

Historical Overview

The Pureta Sausage Company was founded in 1927 in Sacramento by Alfred Zehnder, Joseph Reichmuth and Herman Zimmermann. It was first located in the building at 316 Alhambra (now 320). Pureta grew rapidly and was continually adding on to its existing buildings, buying new land, and adding new buildings. There were three additions to the plant in its first five years. During this period of rapid growth, a 1931 article in the Sacramento Bee [Sept. 26, 1931] noted that the *"…slaughtering and meat packing business, the capital city's third ranking industry in the value of output, the sausage division has been enjoying a remarkable growth in the past two or three years."* Pureta was one of four local sausage makers mentioned in that Bee article. The company was only four years old at the time.

(Please see Continuation Sheet)

B11. Additional Resource Attributes: HP6

***B12. References:**

Armstrong, Lance, *Sausage City*, Valley Community Newspapers, May 22, 2015
Sacramento Bee and Union as indicated
Sacramento City Building Permits
Sacramento County Assessors Data
Sanborn Fire Insurance Maps 1915-1951
Thomas Brothers Maps 1937-41

B13. Remarks:

***B14. Evaluator:** Paula Boghosian, Historic Environment Cons.

***Date of Evaluation:** July 8, 2016

(This space reserved for official comments.)

*These items consist of required information.

Description: (continued)

A large mostly brick-surfaced additive building stands to the south across the paved alley from the first building. This building has received a series of ground floor additions and the addition of a partial second floor from about 1935 to 1977. There appear to be at least four different brick surface materials and the concrete second floor wall on the alley. The building's north elevation includes a concrete second floor section, probably 1935-1940, on the east end and extends down the alley to the west as a one story structure with at least two additions, one of brick and one concrete, probably dating between 1940 and 1942. Fenestration along this elevation from east to west includes from the east at Alhambra, a two-car wide garage opening with metal rollup doors below the three second floor windows of which two are large, square and single pane, a one story shorter section of brick with three tall narrow, metal-framed multi-paned windows, adjacent to a longer concrete wall with two windows like those in the adjacent brick section, two smaller windows, a doorway beneath a projecting canopy, another small window, and four identical window openings filled with glass block. This last section of the north elevation was apparently built in 1942.

The west end of the north elevation contains a flat metal canopy above service door and garage door entries in a stucco-surfaced west end of the northern wall. The west wall contains a painted sign for Mary Ann's Bakery on a stucco surface with no windows or doors. This wall is the west wall of a boxlike wing projecting to the west. Next to this wing stands a small garage, and a small commercial building on the corner, neither one of which is part of this same complex.

The south elevation of the Sausage factory building continues on Alhambra on the east side of the small commercial flag store with a continuous brick one-story façade, shallow cornice projection, and simple linear wall design with a pattern of projecting brick. From west to east there are three large differently sized metal rollup garage doors, a standard door beneath a metal canopy frame, a central two story section surfaced with brick, two standard metal doors and two square shop windows beneath a building sign that says "Tea Shop." The additional second story section ends here. . Next there is a standard metal door, and, almost to the angled corner, another. This south elevation façade serves two buildings, one from 1950 and one from 1959.

The one and two story rectangular building holding the public entry and extending from D Street to the alley off of Alhambra was built betwee1935 and 1940. The angled corner entry contains a double metal door, and there is another square window around the corner on the east elevation. A canopy frame covers the corner entry and a few feet on either side. There is a section of brick beneath the window on the east that is lighter in color, either infill of an opening or covering graffiti. A section of wall a little further north appears to have experienced graffiti. The next section contains the second story portion on the east elevation which contains eight single pane fixed windows above another metal door with canopy, a section of wood planks applied to the brick, and a standard door. The elevation then ends at the paved alley on the north end of this building.

Alterations include the application of a section of wood siding to a small portion of the brick wall on the east elevation near the alley when a small portion of the complex was rented to another business. Other alterations include the addition of minor functional elements contributing to meat packing and distribution over time, and later bakery functions of the complex.

A small portion of the complex is not 50 years of age and was added for the bakery use and not the Pureta Company's activities.

B10. **Significance** **(**Continued)

By 1940, the owners of the company were Zehnder, George E. Wurster, A.C. Jacobs, Joseph F. Enos, Anton Holly and Frank Linggi, Jr. At that time, a Sacramento Union article [Feb. 23, 1940] recognized the Pureta plant as, *"…one of the most modern (plants) of its kind on the Pacific Coast."* By that time, Pureta had around 110 employees, a fleet of 27 refrigerated trucks and five automobiles for its sales force. It also had offices in Redding, Chico, Modesto, Oakland and Santa Rosa. The company's product line-up included: sausage, frankfurters, bologna, salami, smoke bratwurst, liverwurst and head cheese.

Figure 1- This 1930s photograph shows the remarkable growth of the Pureta Sausage Co. It shows a fleet of distribution trucks and at the far end, a fleet of cars for the sales force. Lance Armstrong Collection.

In 1941 Pureta began the seventh addition to its complex. They spent $75,000 adding some 13,000 square feet of space. The business had expanded its fleet to 33 vehicles and it employed up to 140 people during its peak season. [Sacramento Union, July 20, 1941]. The Chamber of Commerce Directory of Industries for 1941, listed Pureta as one of the largest wholesale distributors in Sacramento. The company was distributing its products throughout Central and Northern California.

A 1948 obituary for part-owner George Wurster named Pureta Sausage Co. as "…one of the largest firms of its kind on the Pacific Coast." [*Sacramento Bee*, August 28, 1948]. By 1957 Pureta had expanded its truck fleet to 50, was employing up to 200 people in peak season, and was processing about 2 million pounds of meat per month. [Armstrong]

In 1959 Pureta ran an advertisement in the *Sacramento Bee* announcing the Gold Medals for quality that its product had won the recent California State Fair.

A 1963 article in *The Bee* [May 26, 1963] announced that Pureta was expanding its market into the SF Bay region. At the time, the company employed about 225 people and a company official said that it *"…was one of the largest and most modern sausage plants on the Pacific Coast."*

.

Pureta's strength as a regional meat product distributor caught the attention of a national company, Hygrade Food Products, that purchased Pureta in 1964 [Bee, April 26, 1964]. Hygrade won a competition in 1959 with a new frank and became the exclusive hot dog for the Detroit Tiger's baseball stadium. The new product proved to be very popular with Tiger fans and they were soon selling briskly in grocery outlets. To expand its market penetration Hygrade purchased Pureta to make and distribute their new Ball Park franks in Northern California. The new franks were sold in local and regional supermarkets under the name "Pureta, Ball Park Franks."

Center for Sacramento History

At the time of its purchase, the Pureta Sausage Co. had sales distribution and warehouse facilities in: Vallejo, Santa Rosa, Fresno, Modesto, San Jose and Chico. As is common in this type of acquisition, the most important asset to the purchaser is the sales and distribution network. Establishing such a system from scratch is very costly and could take many years. Hygrade made a smart moving in purchasing an existing wholesaler with a good reputation. It was also just a matter of time before there would be a production consolidation and the Sacramento plant was phased out and closed in 1969 [Sacramento Bee, March 6, 1969].

The Pureta plant was not vacant for long and was soon reopened in 1970 as Mary Ann's Baking Company. Mary Ann's was founded by a Greek immigrant, Andrew Demas. Demas was a popular and well known man in the Greek community in Sacramento. In the 1970s he turned the company over to his three sons. The Bakery was very successful and employed up to 170 people [Bee, June 23, 2002]. In 2004 Mary Ann's moved to a new facility on Power Inn Road [Bee, Nov. 5, 2015].

The Pureta Sausage Company was an important Sacramento-based company that had its roots in the Valley's agribusiness history. It was a major regional wholesaler/distributor and manufacturer of processed meat products for more than 40 years. Meat packing was at one time one of Sacramento's top industries and Pureta was one of its leading companies. It was also recognized as a major player in the wholesale distribution industry by the Sacramento Chamber of Commerce. Pureta was also recognized for its prominence in its industrial niche on the Pacific Coast. The Pureta Sausage Company and its production plant on Alhambra Blvd. are significant historic resources as part of the region's agribusiness industry in general and specifically meat packing and processing. Its success in the region made it a prime candidate for acquisition by a company expanding into national distribution channels and it played a role in spreading the popularity in this region of an iconic national food brand: Ball Park Franks

As such, the Pureta Sausage Company.property appears to meet California Register of Historical Resources criteria b(1); "It is associated with events that have made a significant contribution to the broad patterns of local or regional history." A small portion of the complex was constructed in 1977 and is not yet 50 years old. California Register criteria do not require that eligible properties be 50 years of age.

The former Pureta Sausage Co. also appears eligible for listing in the Sacramento Register of Historic and Cultural Resources under criteria a.(i), due to its association "with events that have made a significant contribution to the broad patterns of the history of the city, the region, the state or the nation." The Pureta Sausage Company served as a vital component of the region's business evolution and history.

Figure 2 - The two-story portion of the building, just south of the alley.

Figure 3 - Panorama showing southeast corner of the building complex.

Figure 4 - Sitting on the north side of the alley, 320 Alhambra Blvd. was the original building and was numbered 316.

Figure 5 - Estimated Construction Dates

Appendix B: Pureta Sausage Factory and Distribution (320-350 Alhambra Blvd), Character-Defining Features Memo prepared by ESA, June 28, 2022.

ESA

2600 Capitol Avenue
Suite 200
Sacramento, CA 95816
916.564.4500 phone
916.564.4501 fax

esassoc.com

memorandum

date	June 28, 2022
to	Danielle Parrella, Gateway Development Company
cc	
from	Amber Grady, ESA
subject	Pureta Sausage Factory and Distribution (320-350 Alhambra Blvd.) Character-Defining Features Memo

The subject property at 320-350 Alhambra Boulevard, Sacramento (APNs 003-0112-021, -017, -018, and -020) includes two buildings formerly associated with the Pureta Sausage Factory. In 2016, the subject property was evaluated for historic significance and recommended eligible for the California Register of Historical Resources under Criterion 2 and for listing on the Sacramento Register of Historic and Cultural Resources for its association with the Pureta Sausage Co. as a "vital component of the region's business evolution and history."[1] As such the Pureta Sausage Factory is a historical resource for the purposes of CEQA. The City of Sacramento's Preservation Director, Sean deCourcy, has reviewed the 2016 evaluation and has concurred with the finding of significance and identified that the portions of the site built between 1926 and 1935 are the contributing elements. Gateway Development Company has hired ESA to identify the character-defining features of this resource to inform potential redevelopment of the subject property. ESA's efforts have been confined to those portions of the site constructed between 1926 and 1935 as those are the portions that contribute to the subject property's historical significance. In the preparation of this Character-Defining Features Memo, ESA reviewed the 2016 DPR523 forms prepared by Paula Boghosian of Historic Environment Consultants and conducted a site visit with city staff. An assessment of structural integrity or any aspects of the building(s) as it relates to the financial feasibility of rehabilitation is outside of the scope and not provided by ESA.

Character-Defining Features

There are two buildings on the subject property that were constructed between 1926 and 1935. The following provides an overall description and a list of the character-defining features of each building.

1 Historic Environment Associates. *320-350 Alhambra Blvd. Department of Parks and Recreations 523forms*, 2016, page 6.

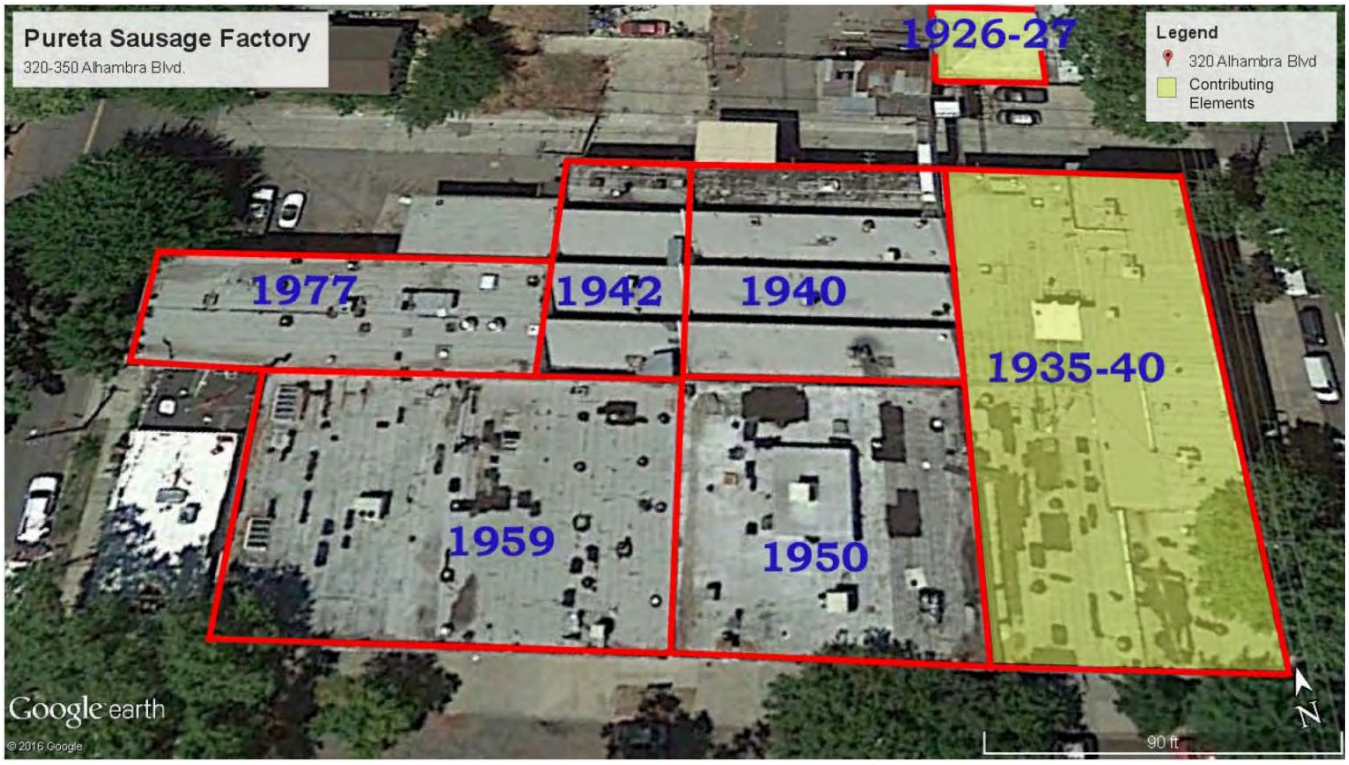

Figure 1, Historic Pureta Sausage Company Factory Site, (Historic Environment Consultants, 2016)

1926 Building (APN 003-0112-018)

The 1926 Building is located north of Chinatown Alley, which bi-sects the subject property. It is a brick, one-story building with a rectangular footprint that fronts Alhambra Boulevard. The east façade abuts the public sidewalk. The site is paved to north, west, and south of the building. The roof is a double dutch gable with a parapet wall. The east (primary) façade (**Figure 2**) is symmetrical and includes four, multi-paned, metal framed windows and is sheathed in a raked brick cladding that differs from the structural masonry construction (**Figure 3**). The patterning of the brick on the east façade includes a row of header bricks spanning the the full length of the façade over the windows, spans of header bricks at the sill of each window, and a row of header bricks topped by a soldier course at the top of the parapet wall at the roof line. The south façade includes two metal-framed, multipane windows, a large roll up metal door, and a single pedestrian door (**Figures 4 and 5**). Portions of the south and west facades are covered by a brick and concrete addition (**Figures 4-6**). The remainder of the west façade includes a large roll up metal door (**Figure 6**). The north façade is a blank brick wall with no openings (**Figure 7**). See **Figures 2-7** for images of the 1926 building.

Character-defining features:

- Brick construction
- One-story massing
- Parapet wall
- Brick pattern (east façade)
- Six multi-paned, metal framed windows (four on the east façade and two on the south facade)

Figure 2, East (Primary) Façade, ESA 2022

Figure 3, East (Primary) Façade, window detail, ESA 2022

Figure 4, South Façade (West End), ESA 2022

Figure 5, South Façade (East End), ESA 2022

Figure 6, West (Rear) Façade, ESA 2022

Figure 7, North Façade, ESA 2022

1935 Building (APN 003-0112-020)

The 1935 Building is located south of Chinatown Alley, which bi-sects the subject property. It is a brick, one- and two-story building with a rectangular footprint that fronts both D Street and Alhambra Boulevard. The building abuts the public sidewalk on the east and south. The east and south facades are considered the primary facades. The west façade of the original 1935 portion of the building has been completely enclosed since 1950 addition was completed. The 1940 and 1950 additions to the west run the full length of the building. Flat roofs cover both the one- and two-story portions of the building. The south façade includes a window opening, a single pedestrian door opening, and a larger opening that extends to the sidewalk; all remaining openings are boarded up with many previous openings infilled with a lighter color brick (**Figures 8-10**). The primary entry is located on the southeast corner (**Figure 11**). Both the south and east facades have street frontages and are considered primary facades (**Figures 8-13**). The east façade includes two window and three door openings on the first floor; all are boarded up (**Figures 12 and 13**). The second floor includes nine original window openings with replacement windows (**Figures 12 and 13**). Horizonal and diagonal wood siding has been added to the north end of the east façade (**Figure 13**). The north façade fronts China Alley and is brick on the first floor and stucco on the second floor (**Figures 15 and 16**). The first floor includes two large metal, roll-up doors; two pedestrian doors; and three multi-paned, metal framed windows (**Figures 15 and 16**). The second floor includes two aluminum framed windows; one one-over-one wood framed window; and five vents (**Figure 14**). See **Figures 8-16** for images of the 1935 building.

Character-defining features:

- Brick construction
- One- and two-story massing
- Parapet wall
- Brick pattern (east and south façades)
- Clipped corner entry (southeast corner)
- Three multi-paned, metal framed windows (north façade)

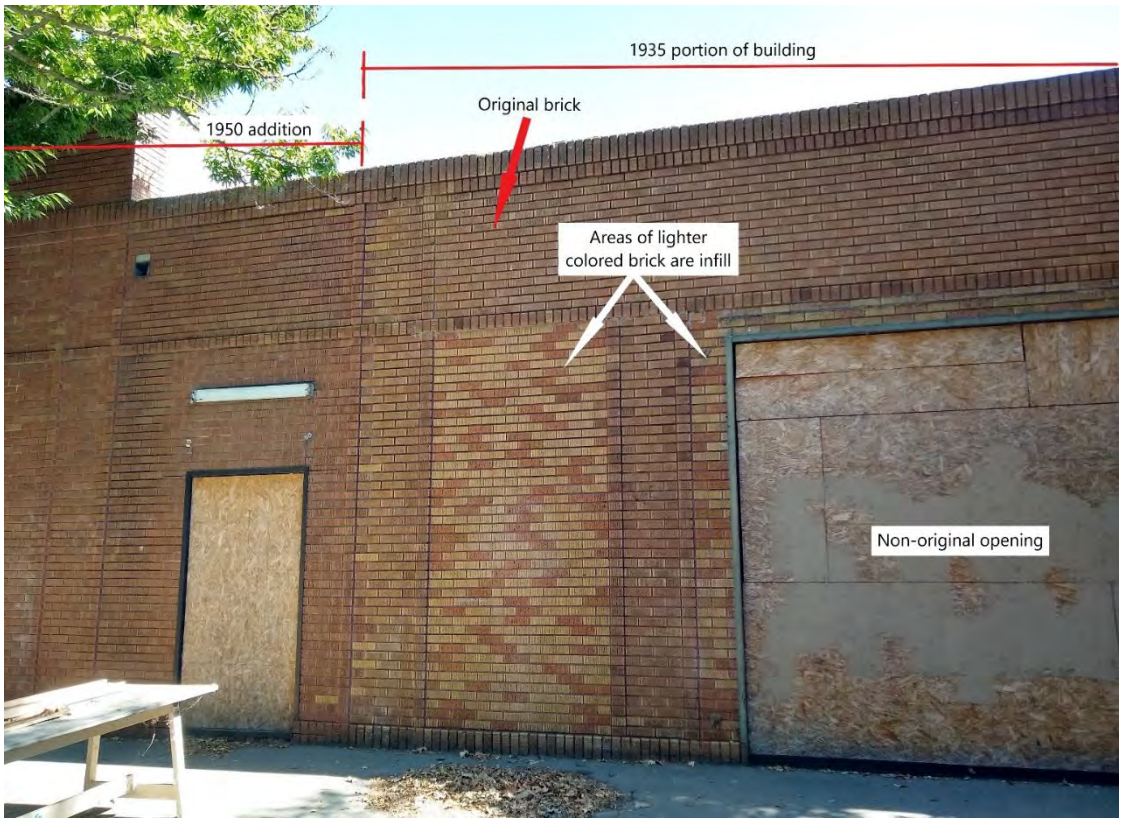

Figure 8, South Façade (West End), ESA 2022

Figure 9, South Façade, ESA 2022

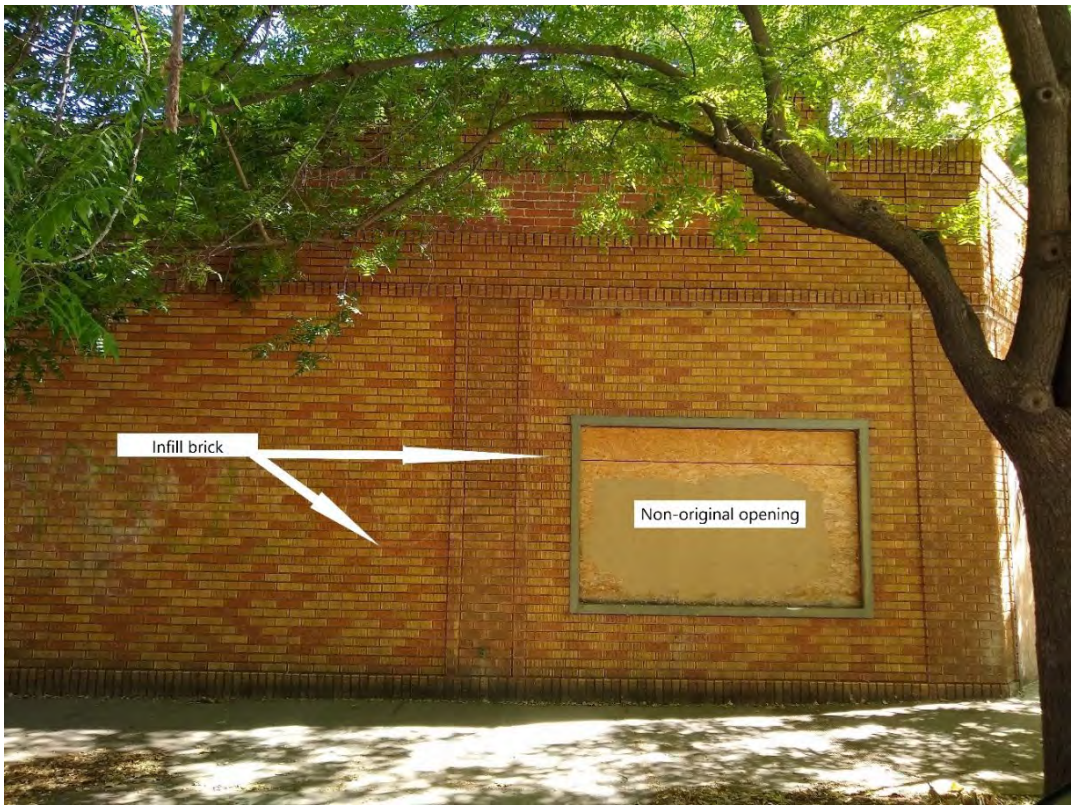

Figure 10, South Façade (East End), ESA 2022

Figure 11, Southeast Corner, ESA 2022

Figure 12, East Façade, ESA 2022

Figure 13, East Façade (North End), ESA 2022

Figure 14, East and North Facades, ESA 2022

Figure 15, North Façade (West End), ESA 2022

Figure 16, North Façade (West End), ESA 2022

Appendix C: Owner/Occupant Tables

311 30th Street - Ownership History

Year(s)	Owner	Source
1922	C.F. Peterson	Sacramento Building Division
1922-ca. 1924	J.H. Shepard	Polk's 1922-1924 Sacramento City Directory
Ca.1924-ca.1929	Unknown	
Ca. 1929-ca. 1932	J.B. Wilson	Polk's 1929-1932 Sacramento City Directory
1932-1945	Unknown	
1945-ca.1959	Woodrow W. McDaniel and Beulah McDaniel	Polk's 1945-1959 Sacramento City Directories; "Mother, Daughter Fight; Mother Is Jailed," *The Sacramento Union*, September 29, 1945
Ca. 1959-1976	Unknown	
1977	Dain Etux Domich Jr.	Sacramento Assessor's Office
1977-1980	Keith W. Etux Buchanan	Sacramento Assessor's Office
1980-1983	Terry T. Ketchum and Emily M. Ketchum	Sacramento Assessor's Office
1983	Emily M. Ketchum	Sacramento Assessor's Office
1983-1986	Norm E Williams and Nancy Marie Williams	Sacramento Assessor's Office
1986-1992	Nancy Marie Williams	Sacramento Assessor's Office
1992-2006	Nancy Carrari	Sacramento Assessor's Office
2006-2007	McKinley Place Sacramento LLC	Sacramento Assessor's Office
2009-Present	George Demas	Sacramento Assessor's Office

311 30th Street - Occupant History

Year(s)	Occupant	Source
1922-1924	J.H. Shepard	"A Classy Home Open Sunday For Inspection," *The Sacramento Bee*, May 6, 1924; Polk's 1923-1924 Sacramento City Directories
1925	J.E. Merriam	Polk's 1925 Sacramento City Directory
1926-1928	Unknown	
1929-1932	Mr. and Mrs. J.B. Wilson	Polk's 1929-1932 Sacramento City Directories; "Driver Of Car Which Injured Woman Sought," *The Sacramento Bee*, June 24, 1930
1933	Vacant	Polk's 1933 Sacramento City Directory
1934-1940	King E. and Ollie F. Connor	Polk's 1934-1940 Sacramento City Directories

1941	Alfred Parsons	Polk's 1941 Sacramento City Directory
1942-1943	James K. and Dorthea Mace	Polk's 1942-1943 Sacramento City Directories
1944	Unknown	
1945-1958	Woodrow W. McDaniel and Beulah McDaniel	Polk's 1945-1948 Sacramento City Directories
1959	Unknown	
1960	Irene Zehnle	"Recruit Training Is Given," *The Sacramento Bee*, February 1, 1960
1961-1964	Wallace A.J. Lereaux	Polk's 1961-1964 Sacramento City Directories
1965	James and Darleta Kephart	Polk's 1965 Sacramento City Directory
1966-1972	Frank Lasecki	Polk's 1966-1972 Sacramento City Directories
1973	Virgil E Stewart	Polk's 1973 Sacramento City Directory
1974	Virgil E Stewart or Hazel E Stewart	Polk's 1974 Sacramento City Directory
1975-1977	Hazel E Stewart	Polk's 1975-1977 Sacramento City Directories
1978-1980	K.W. Buchanan	Polk's 1978-1980 Sacramento City Directories
1981-1982	Terry Ketchum	Polk's 1981-1982 Sacramento City Directories
1983	Unknown	
1984	Vacant	Haines 1984 Sacramento City and Suburban Directory
1985	Unknown	
1986-1990	Vacant	Haines 1984-1990 Sacramento City and Suburban Directories
1991-1993	Unknown	
1994-1996	Vacant	Haines 1994-1996 Sacramento City and Suburban Directories
1997-2006	Nancy Carrari	Haines 1997-2006 Sacramento City and Suburban Directories
2007-2008	Vacant	Haines 2007-2008 Sacramento City and Suburban Directories
2009-2019	George Demas	Haines 2009-2020 Sacramento City and Suburban Directories
2020	Chester Ross	Haines 2019-2020 Sacramento City and Suburban Directory
Ca. 2021-2023	Unknown	
2024	Vacant	

311 30th Street - Permit History

Date	Owner	Contractor	Purpose
2/1/1922	C.F. Peterson	Owner	Application for Permit to Build

3000 C Street - Ownership History

Year(s)	Owner	Source
1925-1952	Percy L. Philips	Polk's 1926-1952 Sacramento City Directories; "Building Permits," *The Sacramento Union*, April 17, 1925
1952-1958	Elizabeth Philips	Polk's 1952-1958 Sacramento City Directories; "Percy L. Phillips," *The Sacramento Bee*, November 3, 1952
1959-ca.1961	Unknown	
1961	Brand & Hullen Jones	Sacramento Building Division
Ca. 1962-ca. 1981	Unknown	
1981-2006	Nick and Victoria Luna	Sacramento Building Division, Haines 2000-2008 Sacramento City and County Directories
2006-2019	Luna Family Trust	Sacramento Assessor's Office
2019	Timothy Patrick Swanston and Elizabeth Romo-Swanston	Sacramento Assessor's Office

3000 C Street - Occupant History

Year(s)	Occupant	Source
1925-1958	Percy L. Philips (until death in 1952) and Elizabeth Philips	Polk's 1926-1952 Sacramento City Directories; "Building Permits," *The Sacramento Union*, April 17, 1925
1957-1977	Edna Weightman	Polk's 1957-1977 Sacramento City Directories
1978	Vacant	Polk's 1978 Sacramento City Directory
1979	Unknown	
1980	Vacant	Polk's 1980 Sacramento City Directory
1979-1981	Unknown	
1982	Vacant	Polk's 1982 Sacramento City Directory
1983	Unknown	
1984	Vacant	Haines 1984 Sacramento City and Suburban Directory
1985	Unknown	
1986-87	Vacant	Haines 1986-87 Sacramento City and Suburban Directories
1988-2018	Not Listed	Haines 1988-2018 Sacramento City and Suburban Directories

2020-Present	Unknown	Haines 2019-2020 Sacramento City and Suburban Directory

3000 C Street - Permit History

Year	Owner	Contractor	Scope of Work
2/1/1933	Elizabeth Philips	A.L. Johnson	Illegible (The word "Installation" is decipherable)
3/22/1961	Brand & Hullen Jones	Orchard Supply Co.	Repair termite and rot damage to dwelling
7/22/1981	Nick and Victoria Luna	Owner	Electrical (Change Service)
1/13/1999	Nick and Victoria Luna	NA	Reroofing
3/27/1999	Nick and Victoria Luna	Annie Henderson (Allstate)	PG&E Meter Moved

301 30th Street - Ownership History

Year(s)	Owner	Occupant
1925-1952	Percy L. Philips	Polk's 1926-1952 Sacramento City Directories; "Building Permits," *The Sacramento Union*, April 17, 1925
1952-1958	Elizabeth Philips	Polk's 1952-1958 Sacramento City Directories; "Percy L. Phillips," *The Sacramento Bee*, November 3, 1952
Ca.1955-1957	Unknown	
1957-1961	William H. and Connie Brooks	Polk's 1957-1961 Sacramento City Directories
1961	Brand & Hullen Jones	Sacramento Building Division
Ca. 1962-1981	Unknown	
1981-2006	Nick and Victoria Luna	Sacramento Building Division, Haines 2000-2008 Sacramento City and County Directories
2006-2019	Luna Family Trust	Sacramento Assessor's Office
2019	Timothy Patrick Swanston and Elizabeth Romo-Swanston	Sacramento Assessor's Office
2019-Present	John Demas	Sacramento Assessor's Office

301 30th Street - Occupant History

Year(s)	Occupant	Source
1925-ca.1933	Percy L. and Elizabeth Philips	Polk's 1926-1952 Sacramento City Directories; "Building Permits," *The Sacramento Union*, April 17, 1925; "Building Permits," *The Sacramento Union*, April 17, 1925
1934	James C. Eakes	Polk's 1934 Sacramento City Directory
1935-1936	Mrs. E.H. Eakes and A.J. Kingman	Polk's 1935-1936 Sacramento City Directories
1937	L.V. Gordon	Polk's 1937 Sacramento City Directory
1938	Mr. and Mrs. Joe Hamon	Polk's 1938 Sacramento City Directory; "Congratulations," *The Sacramento Union*, January 15, 1938
1938-1939	Mr. and Mrs. A.L. Sarmento	Polk's 1938-1939 Sacramento City Directories; "Collision Sends Six Students To Hospital," *The Sacramento Union*, November 14, 1938

1939-1940	Mr. and Mrs. Stephen M. Sherlich	Polk's 1939-1940 Sacramento City Directories; "Congratulations," *The Sacramento Union*, November 25, 1939
1941	E.A. Spalding	Polk's 1941 Sacramento City Directory
1942	Richard McDonald	Polk's 1942 Sacramento City Directory
1943	O.M. Bradford	Polk's 1943 Sacramento City Directory
1944	Unknown	
1945-1947	Mr. and Mrs. Richard H. McDonald	Polk's 1945-1947 Sacramento City Directories; "Mrs. Mendoth honored At Stork Shower," *The Sacramento Union*, March 24, 1945
1948	Unknown	
1949	W.T. Cippa	Polk's 1949 Sacramento City Directory
1950-1951	Unknown	
1952-1955	Otto Minnis	Polk's 1952-1955 Sacramento City Directories; "Otis Minnis," *The Sacramento Union*, June 20, 1955
1956-1960	William H. and Connie Brooks	Polk's 1956-1960 Sacramento City Directories
1961	Johnnie Williams	Polk's 1961 Sacramento City Directory
1962	Unknown	
1963	Adolph Cordova	Polk's 1963 Sacramento City Directory
1964-1972	Ione Marshall	Polk's 1964-1972 Sacramento City Directories
1973-1978	Dena Borba	Polk's 1973-1978 Sacramento City Directories
1979	Unknown	
1980-1981	William Orchard	Polk's 1980-1981 Sacramento City Directories
1982-2003	Simon Carmona	Polk's 1982 Sacramento City Directory, Haines 1984-2003 Sacramento City and Suburban Directories
2004-2008	Nick Luna	Haines 2003-2008 Sacramento City and Suburban Directories
2009-2012	Vacant	Haines 2009-2010 Sacramento City and Suburban Directories
2013-2014	Simon Carmona	Haines 2013-2014 Sacramento City and Suburban Directories
2015-2018	Vacant	Haines 2015-2018 Sacramento City and Suburban Directories

2019	Jaime Tosch	Haines 2019 Sacramento City and Suburban Directory
2019-ca.2020	John Demas	Haines 2019-2020 Sacramento City and Suburban Directory
2021-Present	Unknown	

301 30th Street - Permit History

Date	Owners	Contractors	Purpose
3/22/1961	Brand & Hullen Jones	Orchard Supply Co.	Repair termite and rot damage to dwelling
7/22/1981	Nick and Victoria Luna	Owner	Electrical (Change Service)
1/13/1999	Nick and Victoria Luna	NA	Reroofing
3/27/1999	Nick and Victoria Luna	Annie Henderson (Allstate)	PG&E Meter Moved

3004 C Street - Ownership History

Year(s)	Owner	Source
1925	Niels H. Lund	"Building Permits," *The Sacramento Union*, March 13, 1925
1925-1928	Thomas L. and Bessie E. Roberts	Polk's 1925-1928 Sacramento City Directories
1928-1933	George R. Spence	Polk's 1928-1933 Sacramento City Directories
1934-1937	Unknown	
1938-1979	Sadie Wolfe	Polk's 1938-1979 Sacramento City Directories
1979	John McMillan	Sacramento Building Division
1979-1984	Edna M. Smith and Beulah McDaniel Smith	Sacramento Assessor's Office
1984-1991	Woodrow W. McDaniel and Beulah McDaniel	Sacramento Assessor's Office
1991-2006	Beulah McDaniel	Sacramento Assessor's Office
2006-2010	Beulah V. McDaniel Family Trust	Sacramento Assessor's Office
2010	Lester M. McDaniel	Sacramento Assessor's Office
2010-2024	McDaniel Family Trust	Sacramento Assessor's Office
2024	George A. and Kim L. Demas Revocable Trust	Sacramento Assessor's Office

3004 C Street - Occupant History

Year(s)	Occupant	Source
1925-1928	Thomas L. and Bessie E. Roberts	Polk's 1925-1928 Sacramento City Directories; "Mrs. Bessie E. Roberts Funeral to be Tuesday," *The Sacramento Bee*, December 26, 1927
1929-1932	George Spence	Polk's 1929-1932 Sacramento City Directories
1933-1937	Jack E. Avena	Polk's 1934-1937 Sacramento City Directories; "Twenty Are Hurt Over Week-End In Auto Crashes," *The Sacramento Bee*, September 4, 1933
1937	Bill and Sadie Wolfe	"Congratulations-," *The Sacramento Union*, September 30, 1937
1938-1939	Sadie Wolfe	Polk's 1938-1939 Sacramento City Directories
1940	Jas Ransom	Polk's 1940 Sacramento City Directory

1941	Aurelio Amabisca and Gilbert Amabisca	"Vital Statistics," *The Sacramento Bee*, September 8, 1941; "Pair Admit Burglarizing Office of Cannery Union," *The Sacramento Bee*, November 26, 1941
1942-1943	Sadie Wolfe	Polk's 1942-1943 Sacramento City Directories
1944	Elmer Vernon Peterson	"Forgery Is Charged," *The Sacramento Bee*, January 20, 1944
1944	Edna Newark	"City Briefs," *The Sacramento Union*, October 27, 1944
1945-1979	Sadie Wolfe	Polk's 1945-1979 Sacramento City Directories
1979-ca.1982	John McMillan	Polk's 1979 Sacramento City Directory, Polk's 1980-1982 Sacramento City Directory, Sacramento Building Division
1983-2009	Unknown	Haines 1984-2009 Sacramento City and Suburban Directories
2010	Jack Stephens	Haines 2010 Sacramento City and County Directory
2011	Helen Stephens	Haines 2011 Sacramento City and County Directory
2012	Lester McDaniel	Haines 2012 Sacramento City and County Directory
2013-2017	Unknown	Haines 2013-2017 Sacramento City and Suburban Directories
2018-2019	Jeff Milberger and Jack Stephens	Haines 2018-2019 Sacramento City and Suburban Directories
2020	Jeff Milberger	Haines 2020 Sacramento City and Suburban Directory
Ca. 2021-2024	Unknown	

3004 C Street - Permit History

Date	Owners	Contractors	Purpose
2/28/1979	John McMillan	Owner	Reroofing

315 30th Street - Ownership History

Year(s)	Owner	Source
1925	Burton H. Bill	Polk's 1925 Sacramento City Directory; Sacramento Building Division
1925-ca.1927	C.C. McCabe	Polk's 1925-1927 Sacramento City Directories; "Open for Inspection," *The Sacramento Bee*, October 3, 1925
Ca.1927-1936	Unknown	
1936-1955	Julius Forman	Polk's 1936-1955 Sacramento City Directories
1955-1981	John and Anna Zanich	Polk's 1955-1981 Sacramento City Directories
1981-1982	Jim and Marilyn Burgess	Sacramento Building Division; "315 30th Street," *The Sacramento Bee*, February 2, 1991, Sacramento Assessor's Office Information
1982-1983	Julie C. Hanretty	Sacramento Assessor's Office
1983-1994	Julie C. Hanretty and Donna G. Day	Haines 1998-2003 Sacramento City and Suburban Directories, Sacramento Assessor's Office Information
1995-2003	Julie C. Hanretty	Sacramento Assessor's Office
2003	Demas Enterprises	Sacramento Assessor's Office
2003-2006	George Demas	Sacramento Assessor's Office
2006-Present	Demas Enterprises	Sacramento Assessor's Office

315 30th Street - Occupant History

Year(s)	Occupant	Source
1925-1927	CC McCabe	Polk's 1925-1927 Sacramento City Directories; "Open for Inspection," *The Sacramento Bee*, October 3, 1925
1928-1930	Alice A Brown	Polk's 1928-1930 Sacramento City Directories
1931	Edward Dalton and Alice A. Dalton (nee Brown)	Sacramento Polk's City Directories, "Edward Dalton Marries Alice A. Brown in Reno," *The Sacramento Bee*, June 19, 1930
1932	Shea Clarence	Polk's 1932 Sacramento City Directory
1933	F.J. Boltano	Polk's 1933 Sacramento City Directory

1934-1936	James E. and Ruth Andrews	Polk's 1934-1935 Sacramento City Directories; "Engaged Girl Is Complimented At Bridal Shower," *The Sacramento Bee*, May 25, 1936
1936-1955	Julius and Mary Forman	"Gertrude Forman is Honored Guest at Housewarming," *The Sacramento Bee*, October 21, 1936; Polk's 1937-1955 Sacramento City Directories
1955-1981	John and Anna Zanich	Polk's 1955-1981 Sacramento City Directories, Sacramento Building Division
1981	Unknown	
1982	Gallaghan's Typing Exchange	Polk's 1982 Sacramento City Directory
1983-2003	Julie C. Hanretty	Sacramento Assessor's Office
2004-ca. 2020	Cheryl Uhl	Haines 2003-2020 Sacramento City and Suburban Directories
2021-Present	Unknown	

315 30th Street - Permit History

Date	Owner	Contractor	Purpose
6/17/1925	Burton H. Bill	Owner	Application for Permit to Build
2/21/1955	John Zanich	Ralph Furtado	Remodel Kitchen
4/19/1982	Jim Burgess	Vicari Electric	Electrical Work (Change 60 Amp Fuse)

Preliminary evaluation of the historic significance of the Casa Loma Terrace neighborhood

Historic Environment Consultants May 20, 2025

This report is partly in response to the report produced by Groundwork Preservation LLC for Demas Enterprises on September 27, 2024. The project proposes to put a 6-story apartment complex, covering nearly an entire city block, and having 332 rental units. However, this report also seeks to take a much deeper look at the historic significance of the surrounding neighborhood, primarily Casa Loma Terrace and a few other properties.

This preliminary survey identified an Area of Potential Effect (APE) that needs to be studied to determine what effect this project will have on adjacent historic resources.

Figure 1 – 403 30th Street. Photo by Don Cox (HEC).

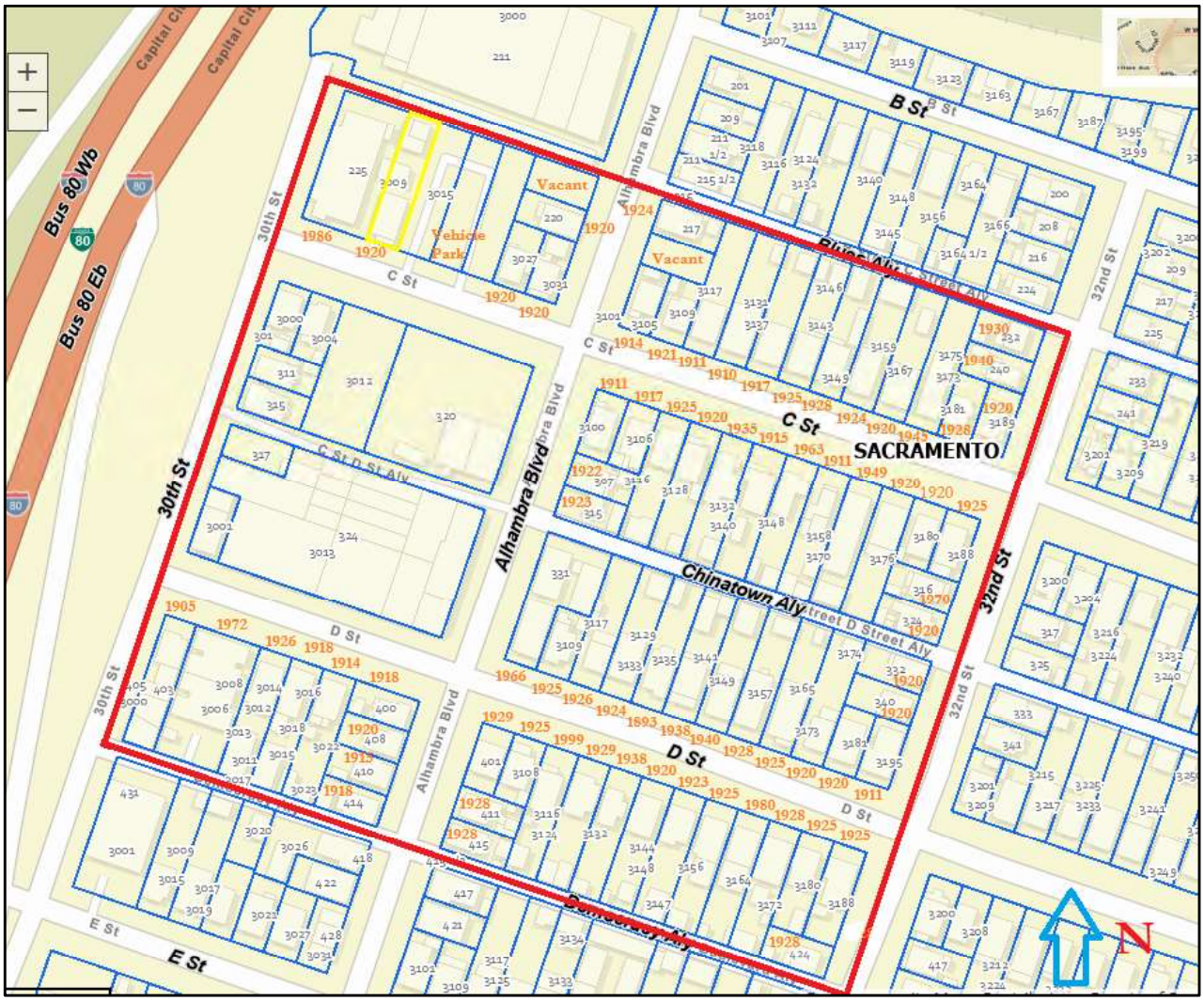

Figure 2 - Area of Potential Effect - Assessor's Map, data provided by HEC

What this preliminary survey intends to show is that this area (the APE) and perhaps all of Casa Loma Terrace is an historic resource.

This report also suggests what is being proposed as "mitigation" for loss of the Pureta Sausage Factory and Mary Ann's Bakery is inadequate.

Casa Loma Terrace

Figure - A handful on Queen Anne houses are mixed in with the later craftsman and period revival cottages. Photo by Don Cox (HEC).

The Casa Loma Terrace development encompasses all the properties from B to E Street and from Alhambra to 33rd Street. In addition, there is a strip of houses on the North side of B Street between Alhambra and 33rd Street. What strikes one during a site visit to the APE is the heavy concentration of one and two-story houses that are Craftsman or Period Revival. Using dates collected from County Assessor's Parcel Viewer reveals that of the 73 housing structures inside the APE, 61 were built before 1930 (84%). Within those 61 housing structures are three Queen Anne houses, two of which predate the development, 403 30th Street (1905) and John Guisto's 1893 house.

Figure 3 – There is a heavy concentration of Craftsman and Period Revival houses throughout the APE, which represents 84% of the housing. Photo by Don Cox (HEC).

The development began after local farmer and rancher John A. Guisto sold his property to the Carmichael Company sometime around 1910. An article appeared in

the Sacramento Bee, on October 15, 1910, p. 12 announcing the opening of the new subdivision. The lots could be reserved, but Carmichael promised he would turn them over to new owners when streets were paved, and curbs and sidewalks were in place. Later that month, Carmichael announced that sales of lots would begin [Bee Oct. 24, 1910, p. 10]. In that ad he mentions, "…some very choice ones have been resold." He concludes the ad with, *"Don't miss this opportunity. You can double your money in two years and perhaps before."* Encouraging this kind of speculative buying was not a good idea. It had been experienced in other developments and proved to slow down the building process. Oak Park was one example [Survey of Oak Park, Historic Environment Consultants, 2007]. Some developers later employed the tactic of placing a minimum cost for houses that could be built, as well as the expectation that building would commence within an established time frame. If building had not begun, the developer retained the right to reclaim the property [HEC National Register Nomination, Montgomery Way]. This may explain why so many homes in Casa Loma Terrace were built in the 1920s rather than in the teens.

Figure 3 - Daniel Carmichael. Photo from Willis, p. 444..

At about the same time Casa Loma Terrace was developing, Carmichael was selling 10-acre home-and-farm parcels in his signature development, Carmichael Colony. It was composed of 4,000 acres of the former Rancho San Juan Land Grant [Reed, p. 813]. The large, suburban district in eastern Sacramento County that bears his name now has an estimated 80,000 residents in a 15.5 square mile section of the Sacramento suburbs Bee, 1/24/2025 in p. 1, 2 in Real Estate Classified].

In 1907, the Sacramento Union newspaper commented on the Carmichael Company and stated that, *"This firm probably handles more property, both city and country, than any other realty concern…The firm enjoys the business of many large commercial and industrial interests."* [Union, 2/3/1907, p. 12].

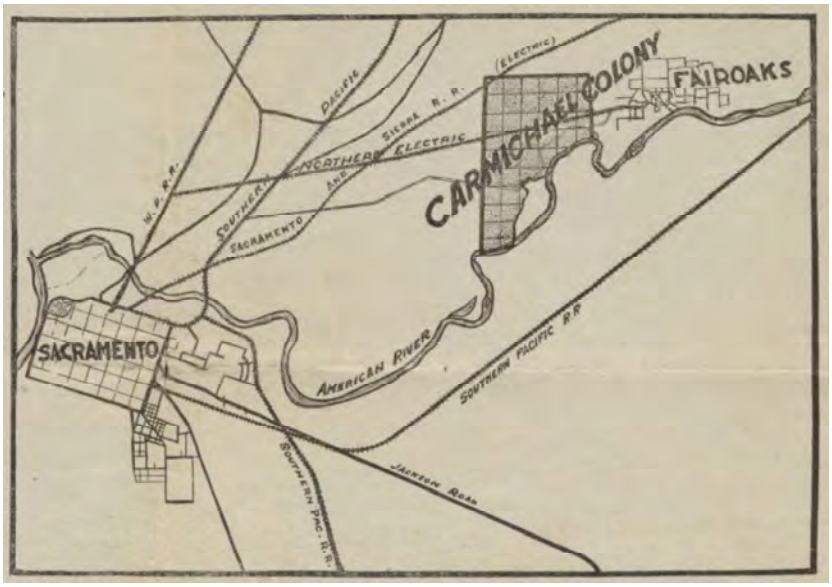

Figure 4 - A 1909 map showing the location of Carmichael Colony No. 1 (Willis, p. 447).

In his obituary, the Bee stated that, *"Carmichael was a pioneer among Sacramento real estate men and active in civic affairs during his long residence in the Capital City. He served as county treasurer and as president of the Sacramento Chamber of Commerce, as well as filling the office of mayor."* [11/2/1936, p. 2]

He also served as City Treasurer and had two terms as Mayor [Bee 11/2/1936, p.2]. He was twice elected as a delegate to the Democratic National Convention. Carmichel was also one of the pioneer developers of the Kern County oil fields. He also founded an oil and gas company.

Figure 5 - The home of Daniel Carmichael at 1903 21st Street. Photo by Don Cox (HEC).

John Guisto

Published in the Bee [4/24/1950, p. 4], the newspaper headlined John Guisto's obituary with *"Services Are Set For Asparagus Pioneer."* The Bee went on to state, *"He operated a farm in the vicinity of D and Thirty First Streets, and it was there he introduced to the Sacramento area the growing of asparagus in 1890."*

As one peruses the fruit label collection of James Henley at the Center for Sacramento History, one realizes that asparagus growing and packing was a lively part of the agribusiness economy. There were several well-known growers and packers involved in its production.

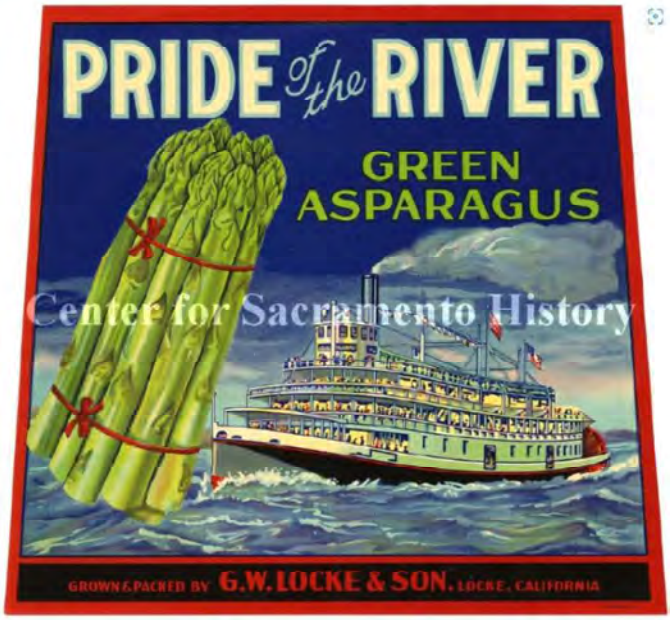

Figure 6 - Asparagus labels courtesy of the Center for Sacramento History.

Guisto's parents arrived in the Sacramento area in the early 1860s from Genoa, Italy. John Guisto was born in Sacramento in 1863.

Guisto sold his property near D and 31st Street (now Alhambra Boulevard) in about 1909. However, he had other plots of land and continued to farm until 1930.

John Guisto and his wife, Mary, built a house on the property at 3135 D Street in 1893. John lived there and died there in 1950. Mary lived there until she died in 1962. Her obituary credits John as, *"…one of the first asparagus growers in the Sacramento Valley."* [Bee 9/14/1962, p. 29]

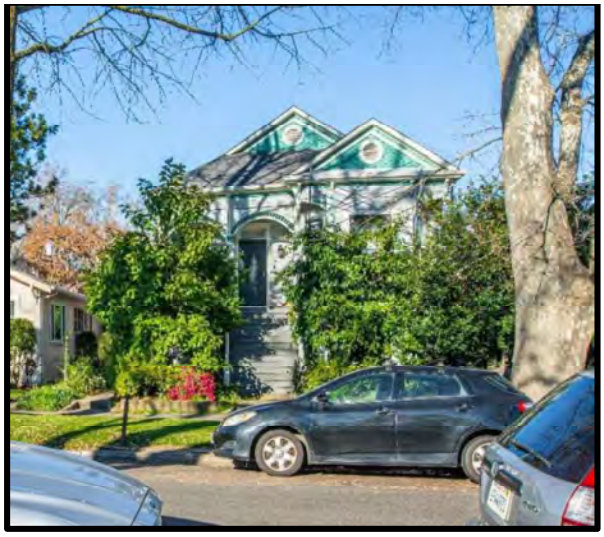

Figure 7 - The 1893 Queen Anne house built by John and Mary Guisto still graces the neighborhood of Casa Loma Terrace.

Figure 8 - Asparagus labels courtesy of the Center for Sacramento History.

Conclusions

The residential housing in the APE meets two of the criteria for listing in the Sacramento Register of Historic & Cultural Resources.

It meets Criteria ii – they are associated with the lives of persons significant in the city's past; and iii – they embody the distinctive characteristics of a type, period, or method of construction.

Criteria ii

The Casa Loma Terrace development is associated with its developer, Daniel W. Carmichael, and his company, the Carmichael Company. He served two terms as Mayor of Sacramento, two terms as County Treasurer, a term as City Treasurer, and was a president of the Sacramento Chamber of Commerce. He and his firm were recognized by the Sacramento Union by stating, *"This firm probably handles more property, both city and country, than any other realty concern."* He also has the major suburb of Carmichael named after him.

Figure 9 – Mural in Carmichael Park, photo by Don Cox (HEC).

Casa Loma Terrace is also associated with John Guisto who was responsible for introducing the growing of asparagus to the Sacramento Region. Many growers and packers joined the movement. Asparagus growing became a vibrant component of the Sacramento Valley agribusiness sector. John and Mary Guisto continued to live in the neighborhood from 1893 to 1962, almost seventy years. Their 1893 Queen Anne home still graces the neighborhood.

Figure 9 - Asparagus labels courtesy of the Center for Sacramento History.

Criteria iii

The homes in the APE and throughout Casa Loma Terrace embody the distinctive characteristics of Craftsman and Period Revival homes built before 1930. The neighborhood has a heavy concentration of these homes and there have been relatively few changes and alterations. In the APE, 84% of the houses fit this definition. The same percentage prevails throughout Casa Loma Terrace. All these properties could become contributing resources to a potentially larger historic district.

This APE meets the criteria to be eligible for designation as an historic district in the Sacramento Register, California Register, and the National Register of Historic Places.

The proposed 6-story project is inappropriate and incompatible in this historic residential neighborhood. The homes in the district are one and two-story. The massive development project will tower four to five stories above that. Designed to be some 68 feet high in a district with a zoning code limit of 35 feet, this new project will tower over the tree-tops and will be seen for some distance. Introducing an urban-style project into a residential historic neighborhood at C Street east of Alhambra Boulevard is problematic. C Street is a major access road for neighborhoods north of E Street, including the commercial office buildings at the historic former American Can Company complex and McKinley Village.

The proposed 6-story project is 68 feet tall

Traffic and Parking

There is a steady volume of traffic in the APE along 30th Street, Alhambra Boulevard, and C Street which is highly evident during a site visit. It is particularly constricted, gridlocked, and untenable as the Elvas Expressway pours into this narrow residential historic neighborhood at C Street east of Alhambra Boulevard. For what should be a quiet residential neighborhood, the traffic is already extremely excessive. Parents with small children should not let them play in the front yard unless closely supervised. Add to that chaos, a 332-unit apartment complex. Using metrics provided by Preservation Sacramento, 332 dwelling units will add about 450-500 daily vehicles to local traffic. What may well happen is that when traffic on C Street gets heavier, some vehicles will begin using D Street. Half a million vehicle trips yearly added to an already overcrowded street system with little street parking available, is unacceptable. H Street already carries freeway volumes as the report in Appendix 1 shows, and it is gridlocked during daily commute hours. Bringing in more cars completely overwhelms the already unsafe volumes in East Sacramento.

Even with 322 parking spaces in the garage, the spillage will fill the local neighborhoods. This is not a transit-oriented housing project. There is no RT train station nearby and the closest bus line is a 6-block walk to J Street. Using C Street, Alhambra Boulevard, and the Camelia City Freeway for high volumes of traffic make this heavily congested vehicle area even worse within this older, historic, park-centered neighborhood.

Figure 10 - On a random site visit, the photograph above shows three cars heading east on C Street at Alhambra Boulevard as well as on coming south on Alhambra.

Figure 11 - In this photo, even though parking is available in the rear, there are seventeen cars parked on the stree. Photo by Don Cox (HEC).

Conclusions

Traffic in this potential historic district is already excessive on C Street and Alhambra Boulevard. It is projected that this oversized, out of scale, 6-story development with some 332 apartments producing as many as 450-500 vehicles making several trips a day, will generate an additional half-million vehicle trips a year through these neighborhoods.

Parking is inadequate and the overflow will spill into the APE. There is no mass transit option readily available. The location of this project along existing east-west streets makes it a car-centric project. Parking and traffic problems will make the historic APE a less desirable place in which to live, and it is likely that property values will fall. So far, this commentary has only focused on the traffic and parking problems that will be created by the residents. There will be additional traffic and parking problems. Service and supply trucks will need to have a place to park. So will all the friends and family who show up to visit the residents of 332 apartments. The problems of parking, traffic, and sewage will also have a negative effect on McKinley Park, which is listed in the National Register of Historic Places.

Figure 12 - Streets in Casa Loma Terrace already have traffic and parking problems, photo by Don Cox (HEC).

Sewage

Before recent work on the underground sewage storage vault at McKinley Park, heavy storms forced the combined sewage and storm water system to overflow and would send raw sewage floating down the low-lying streets, yards, and basements. Adding the proposed large-scale development project will contribute to the ongoing sewage issues, already difficult and dangerous, as experienced by residents in nearby McKinley Park neighborhoods.

Mitigation

The mitigation measures called for by Groundwork are incomplete. Just retaining some existing brick walls and incorporating them into a new structure is insufficient. Without accompanying plaques, photos, and displays the entire significance of the old building is completely lost. Otherwise, the presence of the brick walls merely looks like

decoration on a new building. Also, if you look closely at the plan elevations, the historic brick façade will be punctured by several new doorways and windows.

Figure 13 - A 1948 obituary for part-owner George Wurster named Pureta Sausage Co. as "…one of the largest firms of its kind on the Pacific Coast." [Bee, August 28, 1948]. By 1957 Pureta had expanded its truck fleet to 50, and was employing up to 200 people. Photo courtesy of the Center for Sacramento History.

*Figure 14 - Notice that they weren't packaged as Ball Park Franks, but **Pureta** Ball Park Franks! (Photo courtesy of the Sacramento Center for History.)*

Conclusions

The proposed mitigation for this 6-story development is inadequate. As proposed, it is nothing but facadism. Unless an effort is made to display the history and importance of the Pureta Sausage Company, its significance will be lost forever.

Casa Loma Terrace

Casa Loma Terrace meets two of the most important criteria for listing in the Sacramento Register of Historic and Cultural Resources. It has a significant concentration of craftsman and period revival homes built before 1930 (84%). It is also associated with people who were significant in Sacramento's history (Daniel Carmichael and John Guisto). The proposed project negatively impacts the health and safety of residents, and will destroy the character of this neighborhood and make it a less livable area.

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City of SACRAMENTO
Community Development

ALHAMBRA BOULEVARD
PUBLIC RESOURCES CODE (PRC) 21080.66 CEQA EXEMPTION REVIEW CHECKLIST

Note: The complete Assembly Bill (AB) 130 text, including the entirety of PRC 21080.66 is available at the following link: https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202520260AB130

General Project Site Information

Address of Project Site: 320 and 324 through 350 Alhambra Boulevard; 3004 and 3012 C Street; and 301, 311, 315, and 317 30th Street

Assessor's Parcel Numbers (APNs) of Project Site: 003-0112-001, -002, -003, -004, -017, -018, -020, and -021

Project Site Acreage: 2.26 acres

Project Site Land Use Designation: Residential Mixed-Use (RMU)

Project Site Zoning Designation: General Commercial-Alhambra Corridor Special Planning District (C-2-SPD)

Project Consistency Checklist

To comply with PRC Section 21080.66(a)(1), the Project Site must meet one of the following criteria:	**Yes**	**No**
(A) The project site is not more than 20 acres. OR	☒	☐
(B) The proposed project is a builder's remedy project, and the Project Site is not more than five acres.	☐	☐
For any criteria marked as "Yes" above, please provide substantial evidence supporting the selected answer: The project site is 2.26 acres, and, thus, is not more than 20 acres. The proposed project is not a builder's remedy project.		

To comply with PRC Section 21080.66(a)(2), the Project Site must meet either of the following criteria:	**Yes**	**No**
(A) Is located within the boundaries of an incorporated municipality. OR	☒	☐
(B) Is located within an urban area, as defined by the United States Census Bureau as having at least 2,000 housing units or a population of at least 5,000.	☐	☐

City of SACRAMENTO
Community Development

For any criteria marked as "Yes" above, please provide substantial evidence supporting the selected answer:
The project site is within the city limits of the City of Sacramento.

To comply with PRC Section 21080.66(a)(3), the Project Site must meet at least one of the following criteria:	**Yes**	**No**
(A) Has been previously developed with an urban use, or	☒	☐
(B) At least 75 percent of the perimeter of the site adjoins parcels that are developed with urban uses, or	☒	☐
(C) At least 75 percent of the area within a one-quarter mile radius of the site is developed with urban uses, or	☒	☐
(D) For sites with four sides, at least three out of four sides are developed with urban uses and at least two-thirds of the perimeter of the site adjoins parcels that are developed with urban uses.	☒	☐

For any criteria marked as "Yes" above, please provide substantial evidence supporting the selected answer:

The project site is currently developed with two vacant warehouse buildings associated with Puerta Sauage Factory, three single-unit dwellings, one duplex dwelling, paved surface parking areas, ornamental trees, and other vegetation. Therefore, the site has been previously developed with an urban use.

The project site is bound by C Street to the north, 30th Street to the west, D Street to the south, and Alhambra Boulevard to the east. In addition, commercial and industrial uses are located to the north of the site, across C Street, and residential uses are located to the east and south of the site, across Alhambra Boulevard and D Street. The project site is surrounded by developed parcels on three of the four sides, with Interstate 80 (I-80) Business Loop immediately to the west.

To comply with PRC Section 21080.66(a)(4), the proposed project must meet all of the following criteria:	**Yes**	**No**
(A) The proposed project is consistent with the City's General Plan.	☒	☐
(B) The proposed project is consistent with the City's Zoning Ordinance.	☒	☐

Notes:

1 If the zoning and general plan are not consistent with one another, a project shall be deemed consistent with both if the project is consistent with one.

2 The approval of a density bonus, incentives or concessions, waivers or reductions of development standards, and reduced parking ratios pursuant to Section 65915 of the Government Code shall not

be grounds for determining that the project is inconsistent with the applicable general plan or zoning ordinance.
For any criteria marked as "Yes" above, please provide substantial evidence supporting the selected answer: The City of Sacramento General Plan designates the project site RMU, and the site is zoned C-2-SPD. The proposed project is an allowed use within the RMU land use designation. In addition, the proposed project would require approval of a Conditional Use Permit (CUP) to allow for the exceedance of height restrictions in the Alhambra Corridor SPD. With a CUP, the proposed project is an allowed use within the C-2-SPD zoning designation.

To comply with PRC Section 21080.66(a)(5), the proposed project must meet the following criteria:	**Yes**	**No**
(A) The proposed project would result in a minimum density of 15 units per acre.	☒	☐
For any criteria marked as "Yes" above, please provide substantial evidence supporting the selected answer: The proposed project would include the construction of 332 residential units on 2.26 acres, resulting in a density of 146.9 dwelling units per acre (du/ac).		

To comply with PRC Section 21080.66(a)(6), the Project Site must meet all of the following criteria:	**Yes**	**No**
(A) The Project Site is not located within a Coastal Zone as defined by PRC Section 30103.	☒	☐
For any criteria marked as "Yes" above, please provide substantial evidence supporting the selected answer: According to the California Department of Fish and Wildlife (CDFW), the project site is not located in a Coastal Zone. The nearest Coastal Zone boundary is located approximately 77.7 miles from the project site. <u>Source:</u> California Department of Fish and Wildlife. *California Department of Fish and Wildlife BIOS*. Available at: https://apps.wildlife.ca.gov/bios6/. Accessed September 2025.		
(B) The Project Site is not located on prime farmland, farmland of statewide importance, or land zoned or designated for agricultural protection or preservation.	**Yes** ☒	**No** ☐
For any criteria marked as "Yes" above, please provide substantial evidence supporting the selected answer: According to the California Department of Conservation Farmland Mapping and Monitoring Program, the project site is designated as "Urban and Built-Up land," and does not include any		

prime farmland, farmland of statewide importance, or land zoned or designated for agricultural protection or preservation.

Source:
California Department of Conservation. *California Important Farmland Finder.* Available at: https://maps.conservation.ca.gov/dlrp/ciff/. Accessed September 2025.

(C) The Project Site does not contain wetlands.	Yes	No
	☒	☐

For any criteria marked as "Yes" above, please provide substantial evidence supporting the selected answer:

The project site is developed with urban uses, including existing structures and impervious surfaces, and does not contain any wetlands or wetland features. In addition, according to the U.S. Fish and Wildlife Service (USFWS) National Wetlands Inventory, the project site does not contain wetlands.

Source:
US Fish and Wildlife Service. *National Wetlands Inventory.* Available at: https://fwsprimary.wim.usgs.gov/wetlands/apps/wetlands-mapper/. Accessed September 2025.

(D) The Project Site is not located within a High or Very High Fire Hazard Severity Zone, as determined by the California Department of Forestry and Fire Protection (CAL FIRE).	Yes	No
	☒	☐

For any criteria marked as "Yes" above, please provide substantial evidence supporting the selected answer:

CAL FIRE's Fire and Resource Assessment program indicates that the project site is not located in a High or Very High Fire Hazard Severity Zone (FHSZ).

Source:
California Department of Forestry and Fire Protection. *Fire Hazard Severity Zone Viewer for Real Estate Inspections.* Available at: https://experience.arcgis.com/experience/03beab8511814e79a0e4eabf0d3e7247/. Accessed September 2025.

(E) The Project Site is not listed as a hazardous waste site, unless the Department of Toxic Substances Control (DTSC) has cleared the site for residential use or residential mixed uses.	Yes	No
	☒	☐

For any criteria marked as "Yes" above, please provide substantial evidence supporting the selected answer:

The project site is not located on the DTSC Hazardous Waste and Substances Site List, the list of solid waste disposal sites identified by the State Water Resources Control Board (SWRCB), or the list of active Cease and Desist Orders (CDO) and Cleanup and Abatement Orders (CAO) from the SWRCB.

One address within the site, 324 Alhambra Boulevard, is listed on the SWRCB's GeoTracker database. However, the SWRCB issued a notice on May 7, 2018, stating that an investigation and corrective action carried out at 324 Alhambra Boulevard is in compliance with the requirements of subdivisions (a) and (b) of section 25296.10 of the Health and Safety Code and with corrective action regulations adopted pursuant to section 25299.3 of the Health and Safety Code, and that no further action related to the petroleum release(s) at 324 Alhambra Boulevard is required. In addition, according to the Phase I Environmental Site Assessment (ESA) prepared by Geocon Consultants, Inc. for the project, Sacramento County Environmental Management District (SCEMD) and the SWRCB closed the leaking underground storage tank (LUST) site on May 8, 2018. The closure of the LUST case without activity and use limitations was identified as a Historical REC (HREC) for the project site. Therefore, although the project site is listed on the SWRCB's GeoTracker database, the site has been closed by the SWRCB and SCEMD. Closure of the site by the SWRCB and SCEMD clears the site for residential or residential mixed uses.

Sources:

CalEPA. *Cortese List Data Resources*. Available at: https://calepa.ca.gov/sitecleanup/corteselist/. Accessed September 2025.

Department of Toxic Substances Control. *Hazardous Waste and Substances Site List (Cortese).* Available at: https://www.envirostor.dtsc.ca.gov/public/. Accessed September 2025.

Geocon Consultants, Inc. *Phase I Environmental Site Assessment.* July 20, 2022.

State Water Resources Control Board. *GeoTracker.* Available at: https://geotracker.waterboards.ca.gov/map/?myaddress=California&from=header&cqid=8858350455. Accessed September 2025.

	Yes	No
(F) The Project Site is not within a delineated earthquake fault zone as determined by official maps published by the State Geologist, unless the development complies with applicable seismic protection building code standards adopted by the California Building Standards Commission.	☒	☐

For any criteria marked as "Yes" above, please provide substantial evidence supporting the selected answer:

Based on the Department of Conservation's California Geological Survey data, the project site is located within a landslide and liquefaction zone. However, the project site is not within a delineated earthquake fault zone as determined by the State Geologist, and the nearest earthquake fault zone is located approximately 80 miles to southwest from the project site. Nonetheless, the project will be required to obtain building permit(s) reviewed in compliance with CA Building Standards Codes (Part 2.5 of the of Division 13). Through issuance of building permits, the project is ensured to be in compliance with the '*applicable seismic protection building code standards'*.

Source:
Department of Conservation California Geological Survey. *Earthquake Zones of Required Investigation Maps and Reports.* Available at: https://maps.conservation.ca.gov/cgs/informationwarehouse/regulatorymaps/. Accessed February 2026.

	Yes	No
(G) The Project Site is not within a flood plain as determined by Federal Emergency Management Agency (FEMA) maps, unless the development has been issued a flood plain development permit.	☒	☐

For any criteria marked as "Yes" above, please provide substantial evidence supporting the selected answer:

According to FEMA Flood Insurance Rate Map (FIRM) Number 06067C0180J, the project site is located entirely within Zone X, which is an area located outside of the 100-year floodplain.

Source:
Federal Emergency Management Agency. *FEMA Flood Map Service Center.* Available at: https://msc.fema.gov/portal/home. Accessed September 2025.

	Yes	No
(H) The Project Site is not within a floodway as determined by FEMA maps, unless the development has received a no-rise certification.	☒	☐

For any criteria marked as "Yes" above, please provide substantial evidence supporting the selected answer:

According to FEMA FIRM Number 06067C0180J, the project site is not located within a floodway.

Source:
Federal Emergency Management Agency. *FEMA Flood Map Service Center.* Available at: https://msc.fema.gov/portal/home. Accessed September 2025.

	Yes	No
(I) The Project Site is not located on lands identified for conservation in an adopted natural community conservation plan or habitat conservation plan.	☒	☐

For any criteria marked as "Yes" above, please provide substantial evidence supporting the selected answer:

The project site is not located within the boundaries of an adopted natural community conservation plan or habitat conservation plan. The nearest habitat conservation plan is the Natomas Basin Habitat Conservation Plan, the nearest boundary of which is located approximately 3,200 feet north of the project site.

	Yes	No
(J) The Project Site does not contain habitat for protected species identified as candidate, sensitive, or species of special status by State or federal agencies, fully protected species, or species protected by the federal Endangered Species Act, California Endangered Species Act, or the Native Plant Protection Act.	☒	☐

For any criteria marked as "Yes" above, please provide substantial evidence supporting the selected answer:

Nesting birds and raptors are protected under the Migratory Bird Treaty Act (MBTA), and the proposed project would be required to comply with all General Plan policies and actions, as well as all federal requirements under the MBTA and Endangered Species Act to ensure impacts to nesting birds and raptors would not occur. On-site trees, shrubs, and utility structures could provide potential habitat for nesting birds and raptors, including Purple Martin. Project construction activities, including initial site grading, soil excavation, associated improvements, and/or tree and vegetation removal occurring during the nesting period for migratory birds (typically between February 1 to August 31) could have the potential to result in nest abandonment or death of any live eggs or young, if migratory birds or their nests are present within or near the project site. However, such habitat is not uncommon within the project area, and often includes urban features; therefore, the project site would not be considered a particularly sensitive environment related to nesting bird and raptor habitat.

	Yes	No
(K) The Project Site is not located on lands under a conservation easement.	☒	☐

For any criteria marked as "Yes" above, please provide substantial evidence supporting the selected answer:

Based on the California Natural Resources Agency (CNRA) California Conservation Easement Database (CCED) Viewer, the project site is not located on lands under a conservation easement.

Source:
California Natural Resources Agency. *California Conservation Easement Database (CCED) Viewer.* Available at: https://gis.cnra.ca.gov/apps/cced/. Accessed September 2025.

To comply with PRC Section 21080.66(a)(7), the Project Site must meet the following criteria:	**Yes**	**No**
(A) The project does not require the demolition of a historic structure that was placed on a national, state, or local historic register before the date a preliminary application was submitted for the project pursuant to Section 65941.1 of the Government Code.	☒	☐

For any criteria marked as "Yes" above, please provide substantial evidence supporting the selected answer:

None of the existing structures located on the project site are officially listed on a national, state, or local historic register. While Groundwork Preservation, LLC confirmed that portions of the existing buildings at 320 and 324 through 350 Alhambra Boulevard were deemed eligible for listing in the California Register of Historic Resources (CRHR) as part of the Historic Resources Evaluation (HRE) performed for the proposed project, the buildings have not been officially listed on a national, state, or local historic register. Although the proposed project would remove portions of 320 and 324 through 350 Alhambra Boulevard, the overall building form and all four facades of 320 Alhambra Boulevard, as well as contributing north, east, and south facades of

324 through 350 Alhambra Boulevard would be retained as part of the proposed project, pursuant to the findings and recommendations of the HRE. The proposed project Site Plans specifically retain and incorporate the character-defining features identified in the HRE into the proposed project design, consistent with the U.S. Secretary of the Interior Standards for the Treatment of Historic Properties. Overall, the proposed project would not require the demolition of a historic structure that was placed on a national, state, or local historic register.

Sources:

City of Sacramento. *Sacramento Register of Historic and Cultural Resources*. Available at: **https://www.cityofsacramento.gov/content/dam/portal/cdd/Planning/Historic-Register/Complete_Register.pdf. Accessed February 2025**.

Groundwork Preservation, LLC. *Historic Resource Evaluation – Final, 324 Alhambra Boulevard, Sacramento, California*. September 27, 2024.

National Park Service. *National Register Database and Research*. Available at: https://www.nps.gov/subjects/nationalregister/database-research.htm#table. Accessed February 2025.

Office of Historic Preservation. *California Register of Historic Resources Listed Resources*. Available at: https://ohp.parks.ca.gov/ListedResources/. Accessed February 2025.

To comply with PRC Section 21080.66(a)(8), the Project Site must meet the following criteria if the project was deemed complete on or after January 1, 2025:	**Yes**	**No**
(A) No portion of the project is designated for use as a hotel, motel, bed and breakfast inn, or other transient lodging.	☒	☐

For any criteria marked as "Yes" above, please provide substantial evidence supporting the selected answer:

The proposed project would include the construction of 332 residential units. Hotel, motel, bed and breakfast inn, or other transient lodging is not included as part of the proposed project.

To comply with PRC Section 21080.66(c)(1)(a), a Phase I Environmental Site Assessment (ESA) must be conducted for the proposed project as a condition of approval, and the following condition must be implemented:	**Yes**	**No**
(A) Did the Phase I ESA identify any recognized environmental conditions (RECs)? If yes, a Preliminary Endangerment Assessment must be conducted; see criterion B, below. If no, criteria B is not required to be implemented.	☒	☐
(B) Will a Preliminary Endangerment Assessment be prepared for the proposed project to identify the existence of any release of a hazardous substance on the site and/or any potential for exposure of future occupants to significant health hazards from any nearby	☒	☐

property or activity? If yes, implement the procedure described in the discussion below to mitigate to allowable levels. If no, nothing further is required to be implemented.		

For any criteria marked as "Yes" above, please provide substantial evidence supporting the selected answer:

A Phase I ESA was prepared for the proposed project by Geocon Consultants, Inc. The Phase I ESA identified one LUST located on the project site as an HREC. In addition, three USTs were formerly located on the site. The Phase I ESA also identified an additional unregistered UST located on the project site as an REC, and recommended that the UST be removed under permit from the SCEMD. Thus, the City will require the preparation of a Preliminary Endangerment Assessment as a condition of approval for the development, in accordance with PRC Section 21080.66(c)(1)(a). Preparation of a Preliminary Endangerment Assessment will ensure that, if needed, measures are identified to adequately mitigate the existence of any release of a hazardous substance on the site and/or any potential for exposure of future occupants to significant health hazards from any nearby property or activity to levels required by current federal and State statutory and regulatory standards included in the EPA risk-based screening levels, the California Code of Regulations and the Health and Safety Code (Title 17 (CCR), Title 23 (CCR), California Human Health Screening Levels, and HSC 25123.3). Documentation of cleanup of any identified environmental conditions to appropriate residential-standards shall be submitted to the City prior to issuance of a certificate of occupancy to ensure the appropriate remediation efforts are completed.

Sources:

Environmental Protection Agency. *Regional Screening Levels (RSLs) – Generic Tables*. Available at: https://www.epa.gov/risk/regional-screening-levels-rsls-generic-tables. Accessed February 2026.

Geocon Consultants, Inc. *Phase I Environmental Site Assessment.* July 20, 2022.

State of California Department of Toxic Substances Control. *Preliminary Endangerment Assessment Guidance Manual.* January 1994 (Revised October 2015). Available at: https://dtsc.ca.gov/wp-content/uploads/sites/31/2023/06/PEA_Guidance_Manual.pdf. Accessed February 2026.

State of California Office of Environmental Health Hazard Assessment. *California Human Health and Screening Levels (CHHSLs).* Available at: https://oehha.ca.gov/risk-assessment/california-human-health-screening-levels-chhsls. Accessed February 2026.

To comply with PRC Section 21080.66(c)(2), the Project Site must meet the following criteria:	**Yes**	**No**
(A) Is the Project Site located within 500 feet of a freeway? If yes, see criteria B through F, below. If no, criteria B through F are not required to be implemented.	☒	☐
(B) The building includes a centralized heating, ventilation, and air-conditioning (HVAC) system.	☒	☐

(C) The outdoor air intakes for the HVAC system faces away from the freeway.	☒	☐
(D) The building provides air filtration media for outside and return air that provides a minimum efficiency reporting value of 16.	☒	☐
(E) The air filtration media shall be replaced at the manufacturer's designated interval.	☒	☐
(F) The building is not designed to include any balconies facing the freeway.	☒	☐

For any criteria marked as "Yes" above, please provide substantial evidence supporting the selected answer:

The project site is located approximately 150 feet from I-80 Business Loop. The above criteria are conditions of approval for the proposed project to ensure compliance with the standards related to HVAC systems, air filtration, and balconies, if approved.

For Lead Agency Use Only:

Outcome of required Tribal consultation[1] pursuant to PRC Section 21080.66(b):

In compliance with AB 52 (PRC Section 21080.3.1), the City distributed requests for consultation to the applicable Native American tribes identified by the NAHC. Project notification letters were distributed to UAIC, Wilton Rancheria, Shingle Springs Band of Mi-Wok Indians, and Buena Vista Rancheria of Me-Wuk Indians on April 3, 2024. A response was received from the UAIC on April 8, 2024 requesting consultation on the project. On May 21, 2024, UAIC closed consultation with the stipulation that a certified tribal monitor conduct periodic spot checks during ground disturbance at the site and the inclusion of an unanticipated discoveries mitigation measure. A response was received from Wilton Rancheria on April 8, 2024 requesting consultation for the project. On April 8, 2024, Wilton Rancheria closed consultation with the stipulation that a certified tribal monitor be on site during ground disturbance activities and that their inadvertent discovery treatment plan is included in the construction protocols for the project. Requests for consultation were not received from Shingle Springs or the Buena Vista Rancheria of Me-Wuk Indian tribes within the required 30-day response period. A response was received from the Shingle Springs Band of Miwok Indians on July 30, 2024, requesting continued updates on the project, as well as the record searches and surveys conducted. Such materials were provided. Additional responses were not received within the consultation period.

Notes:

[1] Tribal consultation efforts shall include, but not be limited to, notification of the project to traditionally and culturally affiliated tribes, completion of a CHRIS records search request, and completion of a SLF search by the NAHC.

3RD STORY – 33’
AVG. 2-STORY HOME
IS 20’ TALL
AVG. 1-STORY HOME
IS 15’ TALL

City Council Appeal Hearing April 28, 2026 regarding P24-007, “Alhambra Redevelopment”

Casa Loma Terrace – East Sacramento Neighborhood Association

- We support responsible, compliant higher density housing. Over 95% of members/neighbors surveyed support appropriate development

- This project violates local zoning and General Plan policies, and creates health and safety problems

- Asking for redesign within 35 ft height limit

LOCAL ZONING CONFLICTS - ACSPD

OVERALL: The intent of the Alhambra Corridor Special Planning District (ACSPD) is to ensure the "preservation of neighborhood scale and character".

- A. Maintain and improve the character, quality, and vitality of individual neighborhoods;
- B. Maintain the diverse character and housing opportunities provided in these urban neighborhoods; and
- C. Provide the opportunity for a balanced mixture of uses in neighborhoods adjacent to transit facilities and transportation corridors.
- HEIGHT limited to 35 feet.

LOCAL ZONING CONFLICTS, CONT'D

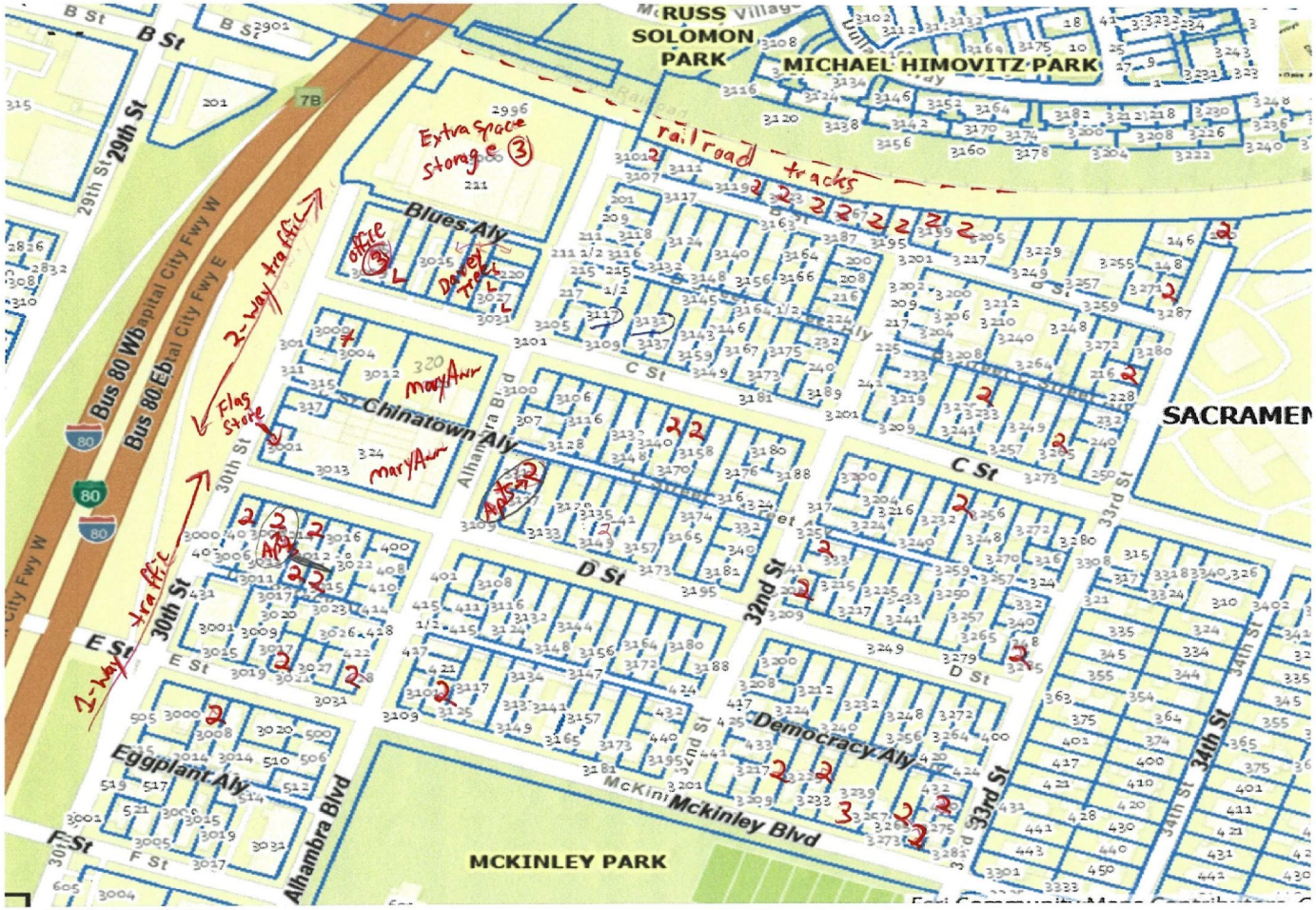
Sacramento City Code 17.420 (ACSPD):

"The Planning and Design Commission May approve a conditional use permit allowing additional height:

To approve the conditional use permit, the Planning and Design Commssion MUST find that the development will not be out of scale with the adjacent residential neighborhood"

COMPARISON: / MEASURE:	P24-007	Adjacent Neighborhood
Height	68+ feet	18 to 30 feet
Number of stories	6	Mostly one-story; some two. Plus (2) three stories
# People Per Square Block	870	48 to 96
# People Per Acre	395	12.8 to 25.6
Square Footage	442,390	890 – 1,800 average, plus smaller ADU's; apartment building(s).

Casa Loma Terrace Building Heights



Greek Church 3

2 = two-story building. There are 2 two-story apartment complexes (16 units & 12 units) nearby.

3 = three-story building. Storage, office, Greek church, & one house

L = Learning Solutions building, all one-story houses

APPLICANT'S SUBMISSION

- 1. SITE PLAN
- ☒ The site layout shall maintain the scale and rhythm of the existing neighborhood.
- Comments / Deviations:
- Yes, the site layout maintains the scale and rhythm of the existing neighborhood.

APPLICANT'S SUBMISSION, CONT'D

- A. ARCHITECTURAL STYLE
- ☒ The design should be similar in scale and architectural character to adjacent single family residential structures. Prevalent styles east of Alhambra include Mediterranean, Mission, Spanish, Colonial, Period Revival, Craftsman and California Bungalow. Prevalent styles west of Alhambra include the above as well as Queen Anne, East Lake, Stick, Italianate and some Blends.
- Comments / Deviations:
- Yes, the architectural style is similar in design and architectural character to the surrounding neighborhoods.

“Scale and rhythm of the neighborhood”

EAST ELEVATION 1/16" = 1'-0" 3

NORTH ELEVATION 1/16" = 1'-0" 2

4

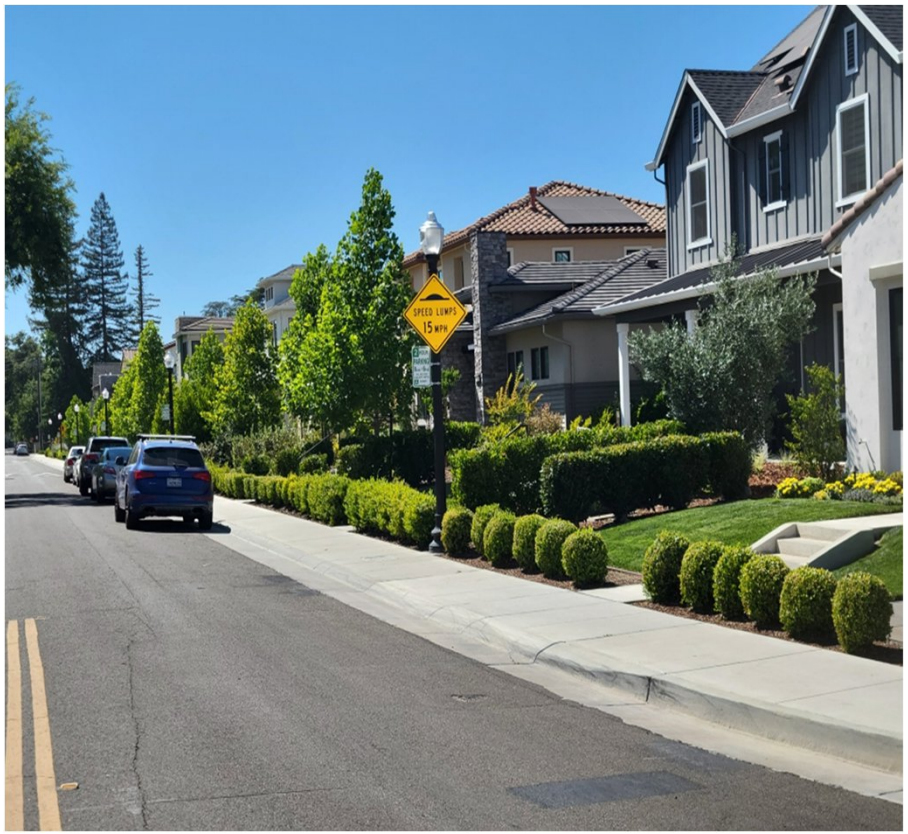
SOUTH ELEVATION 1/16" = 1'-0" 1

GENERAL PLAN CONFLICTS

- LUP-6.3 “The City shall promote the development of… Neighborhood-scale multi-unit buildings.”
- LUP-6.4 City shall recognize patterns in existing neighborhoods, develop defined transitions; designs contribute to the livability of the neighborhood
- LUP-8.11 City shall ensure transitions between areas that border one another so that neighborhoods maintain their own unique qualities

2100 Q Street (formerly Sacramento Bee)

Sutter Park (L)



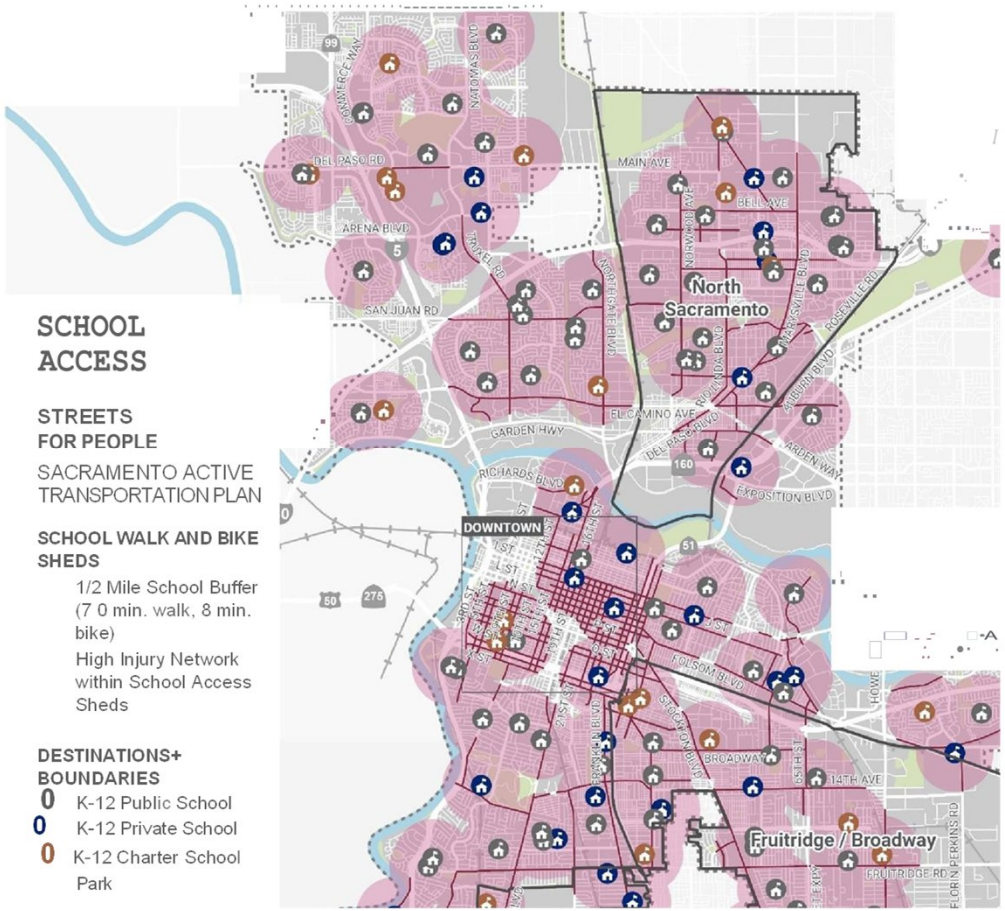
McKinley Village (R)

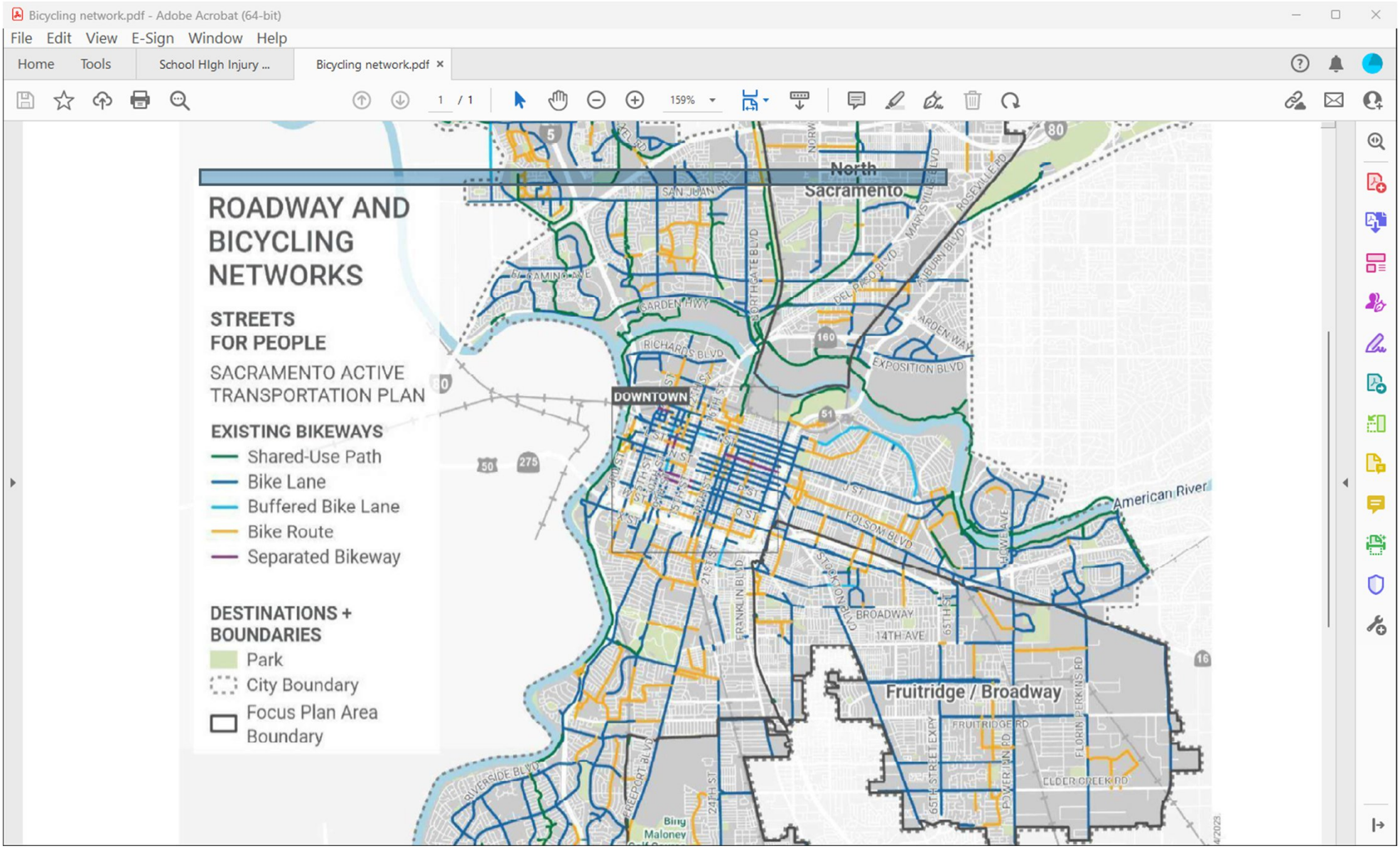
HEALTH AND SAFETY

- TRAFFIC SAFETY
- Sacramento has the highest traffic fatality rate among peer US cities
- Car-centric project generating nearly 1,000,000 vehicle trips per year, over 19,000/week
- Only two exit points – concentrates congestion
- Multiple nearby intersections among worst in City for collisions
- Bounded by “High Injury Network” for school children, pedestrians etc per Streets for People
- Only buffered bike lane in East Sac dumps to Alhambra and C

TRAFFIC SAFETY CONTINUED

- Feeds to extremely congested intersections and freeway on- and off-ramps
- Project conflicts with 20240 General Plan “Vision Zero”
  - M-4.3: The City shall utilize a data driven, “vision zero approach to eliminate ALL traffic fatalities and severe injuries by 2027, while increasing safety, health, and equitable mobility for all.


SCHOOL ACCESS
STREETS FOR PEOPLE
SACRAMENTO ACTIVE TRANSPORTATION PLAN
SCHOOL WALK AND BIKE SHEDS
1/2 Mile School Buffer (7 0 min. walk, 8 min. bike)
High Injury Network within School Access Sheds
DESTINATIONS+ BOUNDARIES
0 K-12 Public School
0 K-12 Private School
0 K-12 Charter School
Park
North Sacramento
DOWNTOWN
Fruitridge / Broadway
DEL PASO RD
ARENA BLVD
SAN JUAN RD
MAIN AVE
BELL AVE
EL CAMINO AVE
GARDEN HWY
RICHARDS BLVD
EXPOSITION BLVD
FOLSOM BLVD
BROADWAY
14TH AVE
FRUITRIDGE RD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ROADWAY AND BICYCLING NETWORKS
STREETS FOR PEOPLE
SACRAMENTO ACTIVE TRANSPORTATION PLAN
EXISTING BIKEWAYS
Shared-Use Path
Bike Lane
Buffered Bike Lane
Bike Route
Separated Bikeway
DESTINATIONS + BOUNDARIES
Park
City Boundary
Focus Plan Area Boundary
North Sacramento
DOWNTOWN
Fruitridge / Broadway
American River
BROADWAY
14TH AVE
FOLSOM BLVD
EXPOSITION BLVD
RICHARDS BLVD
GARDEN HWY
ARDEN WAY
FRUITRIDGE RD
ELDER CREEK RD
RIVERSIDE BLVD
Biny Maloney

HEALTH AND SAFETY

GREENHOUSE GAS EMISSIONS/AIR QUALITY

- Unlike other 6 story buildings in East Sac, P24-007 is not on light rail, and not near major office, retail, and/or campus facilities.
- Adding 990,000 vehicle trips per year conflicts with Net Zero future climate targets in the City's CAAP (Climate Action & Adaptation Plan)
  - 2030: Reduce per capita emissions to 3.63 metric tons of CO_2e per person—63% below 1990 levels. 2045: Reach net zero emissions—100% below 1990 levels.
- 870 maximum residents with 300 parking spaces, and
- Retail with no allotted parking causes idling, circling for parking, and other excess emissions

GREENHOUSE GAS EMISSIONS CONT'D

- Immediately adjacent to Bus 80 (SR51) segment carrying up to 64 million cars per year (CalTrans data 2023)
- Adds nearly 1 million more vehicle trips per year, plus congestion induced idling and circling
- Surrounding area considered "air quality burdened" by City
- What is the "tipping point" for the City to care about residential air quality?

Alhambra Blvd from C St looking south to E/McKinley

CEQA AND AB 130 ISSUES

- ISMND contained major errors and omissions, which were ignored
- AB 130 requires no net GHG increase – conflicts with project
- Known underground storage tank not assessed, therefore exemption not allowed
- Local jurisdiction can reduce scale when project violates both local zoning and General Plan

HOUSING ACCOUNTABILITY ACT

- Project is market rate only
- Applicant has provided no documentation qualifying units as affordable
- HAA provisions limiting local zoning do not apply when the project violates both local zoning and General Plan

INFRASTRUCTURE IMPACTS

- 103,000 gallons/day added to aging combined sewer system
- System already overflows during storms
- Simple physics – flush from 50 feet above ground when system is plugged? Risk of sewage backflow into nearby homes.
- No mitigation plan or funding identified

PARKS AND POPULATION

- Should be offset by 7.9 acres of parkland; pays fee instead
  - McKinley a “destination park”, already overburdened
- Population increase to East Sacramento of 3.97%, not 0.16%
- Compare to:
  - Adding Sacramento’s population to the State’s population: 1.35%
  - Adding San Francisco to the State: 2.2%
  - Adding San Jose to the State: 2.39%
- 34 times denser than East Sacramento overall

CONCLUSION AND REQUEST

- P24-007 conflicts with
  - General Plan
  - ACSPD zoning
  - CEQA requirements
  - City climate, safety, health, air quality, and neighborhood policies
- Please return this project for redesign within the 35 foot height limit
- Goal: A responsible, integrated, sustainable project that benefits the city and the neighborhood