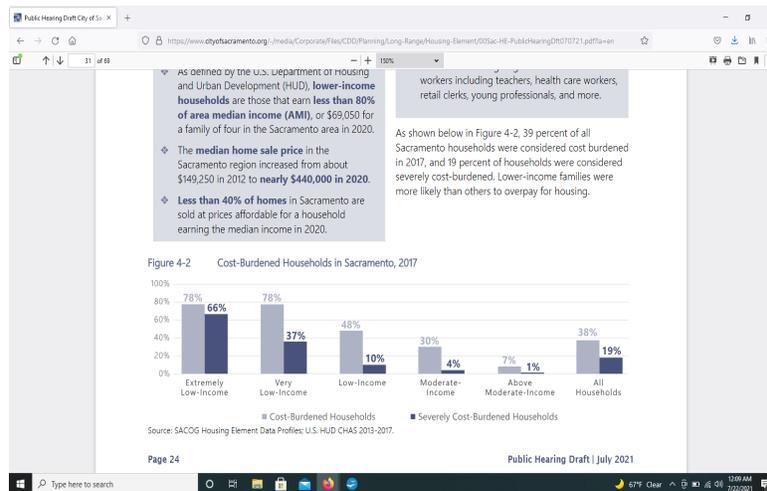




Combine this information with another chart in the Housing Element:



*Almost NONE of the above-moderate income households are cost burdened, yet 44.5% of new housing units projected will be priced for those with above moderate means, while somewhere **around 70-75% of very low-income households are cost-burdened, yet only 23% of the projected housing will be in their price range.***

Even considering the current thinking that the way to build a city out of a housing crisis is to build a tremendous amount of market-rate housing, this Housing Element will fail to achieve its goals to lower the price of housing because there won't be enough market-rate units created. We will nearly double the number of housing units in our city, but only 18.7% of the new units are projected to be moderately priced.

And there is absolutely no research anywhere that says the way to build our way out of a housing shortage or a housing crisis is to build more above-moderate housing than anything else. It is recommended for our current situation that we either we build a majority of low- and very-low housing OR we build a majority of moderate-rate housing. The writers of this housing element do not seem to be following any respected advice from anyone. So who's advice are they following?

Perhaps they are following the advice of the property tax assessors office? The projected housing percentages in this Housing Element will be good for the city revenues that come from property taxes. The greatest amount of city property tax revenues will happen if there is more above moderate housing than any other price point. Let the lowest classes sleep in tents on unwanted pieces of land that no one can see a good way to develop – if they could afford a little piece of land with a little house, they would never keep the city funded with their little, cheap properties. When all is said and done, the city has to make money to keep itself going, and they will accomplish that better with more above moderate housing than any other type.

The land speculators, developers, construction companies, and construction unions also have money to make. And they will make the most from above moderate housing, too.

So far, this Housing Element places a greater value on property values than on providing a healthy, safe home under a solid roof for the majority of hard-working, tax-paying Sacramentans. But will it live up to its promise to move discriminated minorities into historically-redlined, privileged neighborhoods?

**2) Where will most of the new housing units be located?**

While the Housing Element does not tell us exactly where everyone of the 45,580 new units will go, there is one chart in the Housing Element that gives us a good idea where at least half of the projected new units will go on vacant and underutilized lots.

Findings by Community Plan Area

Applying the assumptions and methodology described in Appendix H-2, the City determined the total residential capacity on vacant and underutilized sites within the City (see Table 3-3).

**Table 3-3 Residential Capacity on Vacant and Underutilized Sites by Community Plan Area**

Community Plan Area	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Units
Arden Arcade	21	88	13	122
Central City	4,733	1,154	12	5,899
East Sacramento	404	89	12	505
Fruitridge/Broadway	2,313	1,571	821	4,705
Land Park	432	153	120	705
North Natomas	1,662	1,106	162	2,930
North Sacramento	1,500	1,229	1,236	3,965
Pocket	13	0	58	71
South Area	4,532	970	1,569	7,071
South Natomas	522	212	87	821
<b>TOTAL</b>	<b>16,132</b>	<b>6,572</b>	<b>4,090</b>	<b>26,794</b>

Source: Ascent, 2021; City of Sacramento, 2021.

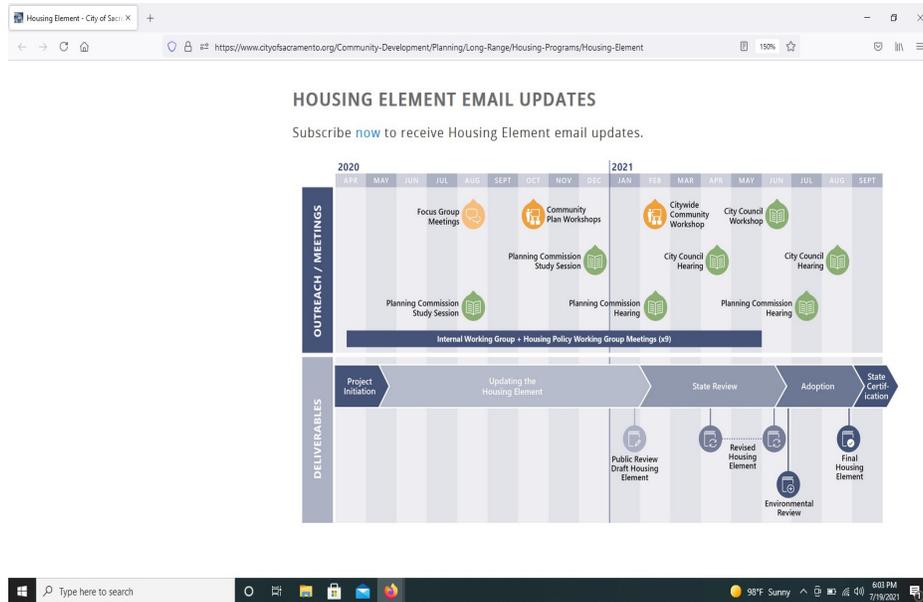
So the Community Plan Areas that might see the most new development will be the South Area with the highest number, then the Central City, and Fruitridge-Broadway, respectively. The areas that will see the least new development will be the Pocket, Arden-Arcade, and East Sacramento.

Let's rephrase that – the neighborhoods that will have the most new development are most likely to be the neighborhoods of Brentwood, Meadowview, Parkway, Midtown, Downtown, Oak Park, Colonial Village, Colonial Manor, and Avondale. Many of these neighborhoods are the last almost affordable neighborhoods in Sacramento, and many are very racially diverse. Roughly 44% of the projected new housing in these areas is supposed to be above-moderate in price? Don't we call this gentrification?

The neighborhoods that will see the least new development will be the privileged areas of the Pocket, Arden-Arcade, and East Sacramento. So much for moving the racially- discriminated people into the privileged neighborhoods.... instead it sounds like this Housing Element wants to move the privileged people into the last affordable areas for lower-income Sacramentans.

**3) Where's the Environmental Impact Report?**

According to the City calendar for the 2040 General Plan, there was supposed to be an Environmental Impact Report (EIR) that was supposed to take place BEFORE the Planning and Design Commission final vote on the Housing Element. Do you see where the EIR was supposed to happen on this diagram – before the Planning Commission Hearing: ?



The reason given for not preparing an EIR as a part of approving the Housing Element is that the Housing Element is a policy document, NOT a planning document. As a policy document, it is not subject to CEQA rules for review. (To read more about the CEQA Negative Declaration, you can read the 75-page staff report justifying this decision at:

<http://www.cityofsacramento.org/-/media/Corporate/Files/CDD/Planning/Environmental-Impact-Reports/20212029-Sac-HE-ISND051821.pdf?la=en>

But now that I have shown you only a few of the charts and diagrams of the Housing Element, does the Housing Element seem to be ONLY a policy document, and NOT a planning document to you?

For more on this, I suggest reading the following letter to the Planning Commission written by other concerned citizens at: <https://no2rezone.files.wordpress.com/2021/06/concerned-citizens-challenge-to-sacramentos-proposed-housing-element-negative-declaration-june-17-2021-1.pdf>

In this Housing Element, Sacramento is considering doubling its population in the next 9-10 years, and the Housing Element is supposed to outline just how we are going to accomplish that AND also meet the housing needs of all Sacramento residents. And there's going to be NO FACTS PRESENTED TO THE PUBLIC of the impact to our water system, sewer system, electrical grid, roads/transportation systems, and school systems before the Housing Element is included in the 2040 General Plan? This is grossly irresponsible of city leadership and staff. Planning and Design Commissioners – please demand a complete EIR be presented for public review and comment before voting on the Housing Element. You are the last line of planning defense for all Sacramentans – and we are depending upon you.

I am not forgetting the Master Environmental Impact Report (MEIR) that was ordered by the City Council back in January and will be presented to the public in the final public review. Let's be honest- by now, at least a preliminary MEIR report draft should be circulating around City Hall, so the likely truth of the impacts on our infrastructure of this increase in housing will by now be known to any of those casting any votes for this Housing Element for inclusion in the 2040 General Plan. Not publicly releasing the EIR or MEIR before the Housing Element leaves the Planning and Design Commission as the original timeline stated leaves close watchers of the Housing Element think there's something in the EIR or MEIR that won't reflect well on the plan

laid out in the Housing Element. If this Housing Element was a great plan, the EIR or MEIR would be released by now for public review as proof of a job well done.

Lack of an early, accurate, and publicly reviewed EIR is also the sign that our elected officials are very cavalier with the quality of life of those who put them in office. The City's intention to spur rapid, unchecked, deregulated development may leave us with insufficient flow of clean water to families, backed-up sewer systems, an overburdened, inconsistent electrical grid, roads impassable for emergency vehicles, and schools too crowded to teach our children.

## ***Conclusion***

Consider the words of the California Legislative Analyst's Office for the State Legislature on housing: “Because the need for housing assistance outstrips current resources and there are fewer policy options to address affordability for low-income households, we suggest the Legislature consider prioritizing General Fund resources towards programs that assist low-income households.” and “Despite higher incomes relative to the rest of the country, for most California households, higher housing costs consume a large portion of their income. Specifically, the typical California household spends about 26 percent of their monthly income on housing. The typical household in the rest of the country, on the other hand, spends about 20 percent. Some households in California spend significantly more on housing. Over 1.5 million low-income renter households in California report spending more than half of their income on housing. This is about 11 percent of all California households, a higher proportion than in the rest of the country (about 7 percent). Figure 1 depicts the share of income spent on rent by income quartile. The figure demonstrates that Californians spend a larger share of their income on rent than households in the rest of the nation at every income quartile and households with the lowest income face the highest rent burden “ (<https://lao.ca.gov/Publications/Report/3941> )

In being asked to vote on this Housing Element, first the Planning and Design Commission and then the City Council are also going to be asked the same question as the State Legislature – will this Housing Element prioritize resources towards programs that will assist low-income households as well as create enough housing for low-income households?

Please vote on this Housing Element with your conscience and for the benefit of the majority of Sacramentans, and not only the 'above moderate' residents. And I hope you don't need help from Jimminy Cricket to do so.

Sincerely,

Jennifer Holden  
Mangan Park Neighborhood Association (MPNA)  
Sacramento, CA  
Council District 5