

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 Commissioners,

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