

Zachary Dahlia

From: Ron Maertz <ronmaertz@surewest.net>
Sent: Thursday, February 12, 2026 3:25 PM
To: Zachary Dahlia; rkutect@gmail.com; District 4; Mayor
Subject: zdahlia@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 Dahlia

From: Ani Baghdassarian <ab@4pbw.com>
Sent: Thursday, February 12, 2026 3:03 PM
To: District 4; Mayor; Zachary Dahlia; rkutect@gmail.com
Subject: Opposition to Project Number P24-007

Follow Up Flag: Follow up
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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 Dahlia

From: Leslie Hagins <lesolita@gmail.com>
Sent: Thursday, February 12, 2026 3:18 PM
To: Mayor; District 4; rkutect@gmail.com; Zachary Dahlia
Subject: Alhambra Corridor Redevelopment Project. PLEASE oppose!

Follow Up Flag: Follow up
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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 Dahlia

From: Susan Heaton <Susan.Heaton@doj.ca.gov>
Sent: Thursday, February 12, 2026 3:04 PM
To: Zachary Dahlia; 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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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

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



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 feet¹. 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. The Initial Study's Analysis of Impacts is Inadequate, Incorrect and Incomplete

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 MTCO₂e 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).

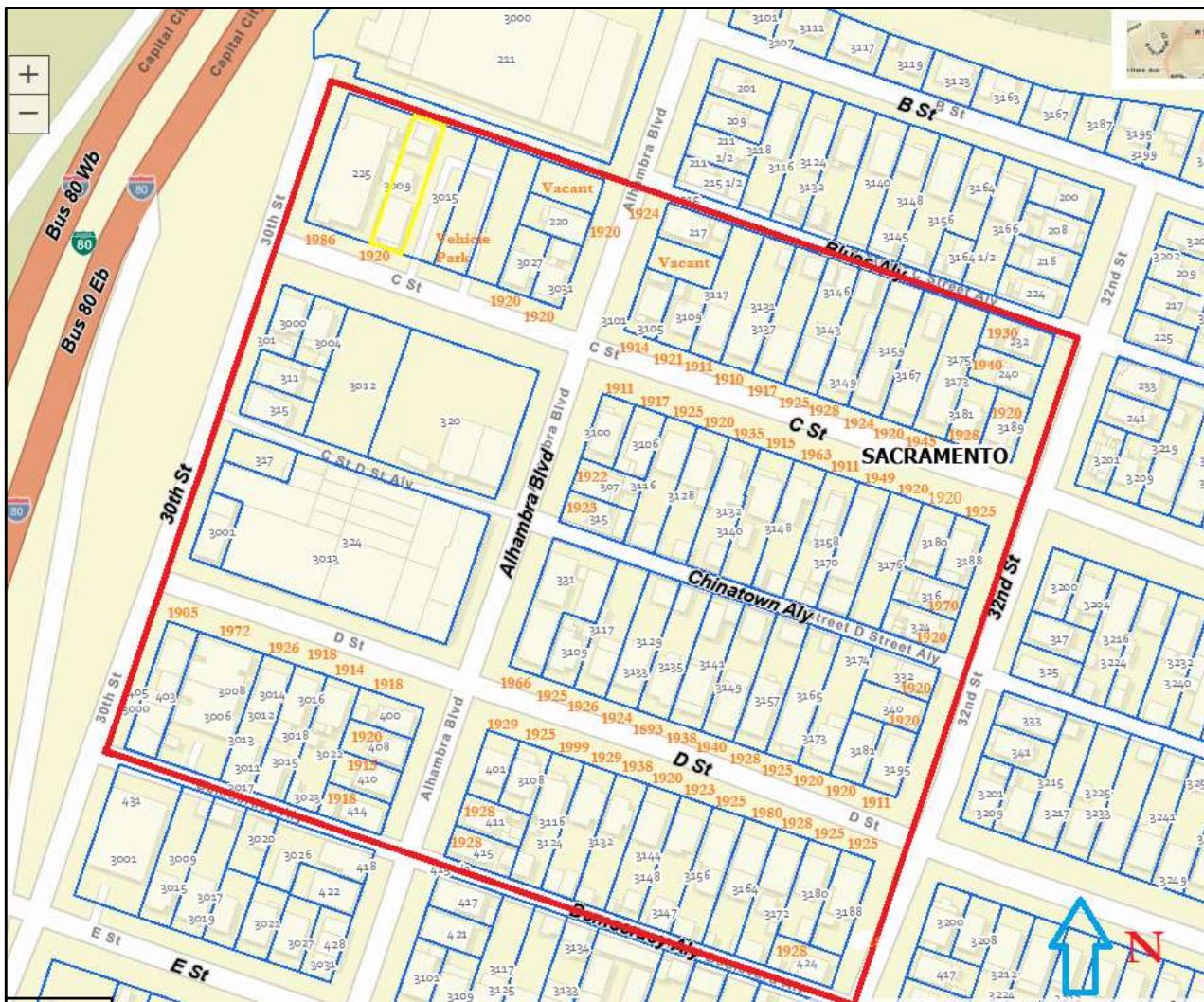


Figure 2 - Area of Potential Effect - Assessor's Map, data provided by HEC

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].

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.

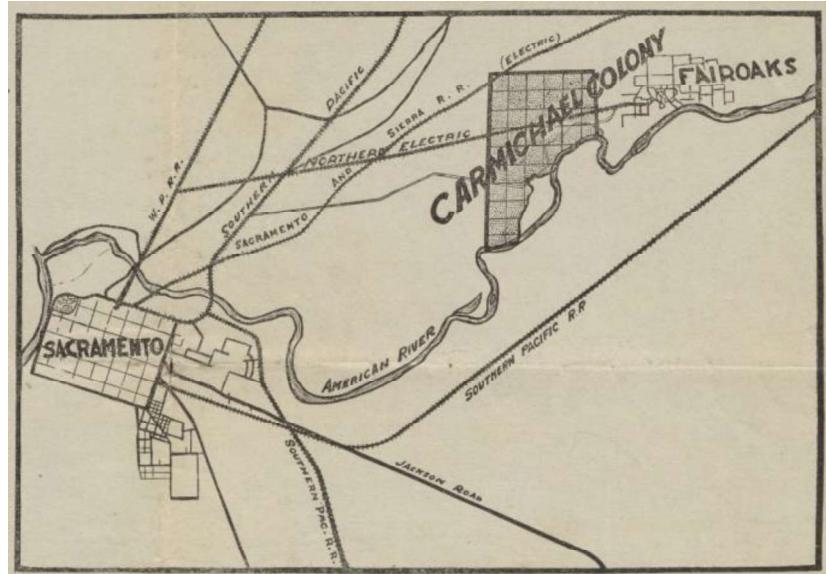


Figure 4 - A 1909 map showing the location of Carmichael Colony No. 1 (Willis, p. 447).



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.

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]

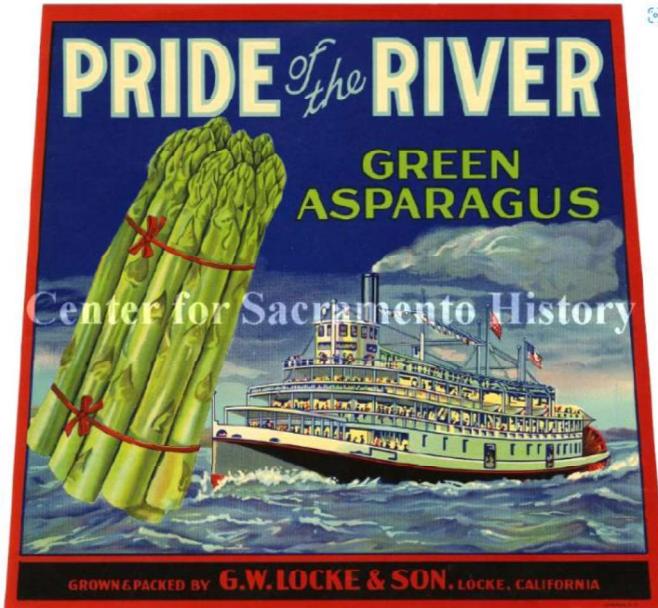


Figure 6 - Asparagus labels courtesy of the Center for Sacramento History.

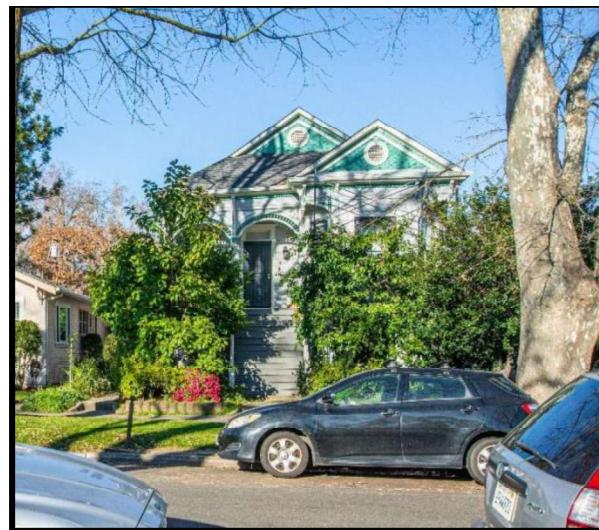


Figure 7 - The 1893 Queen Anne house built by John and Mary Guisto still graces the neighborhood of Casa Loma Terrace.

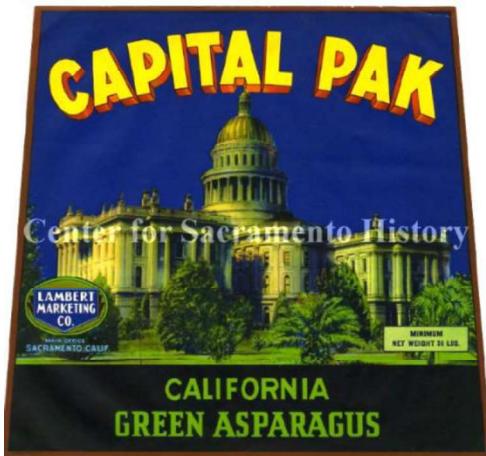


Figure 8 - Asparagus labels courtesy of the Center for Sacramento History.

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.

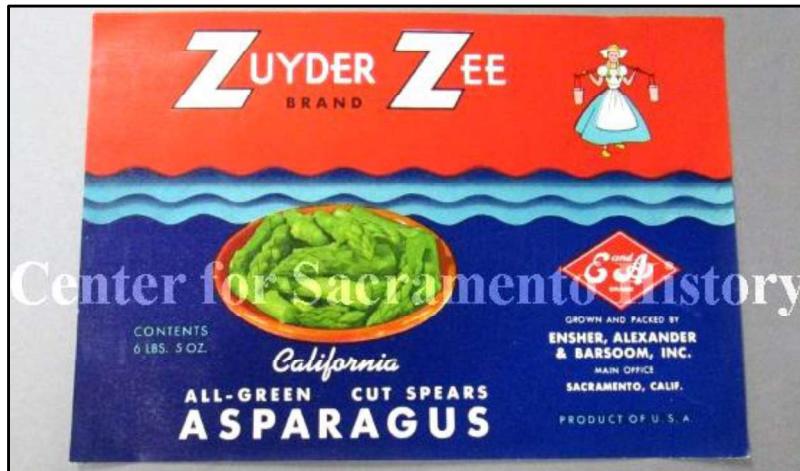


Figure 9 - Asparagus labels courtesy of the Center for Sacramento History.

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 street. 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.

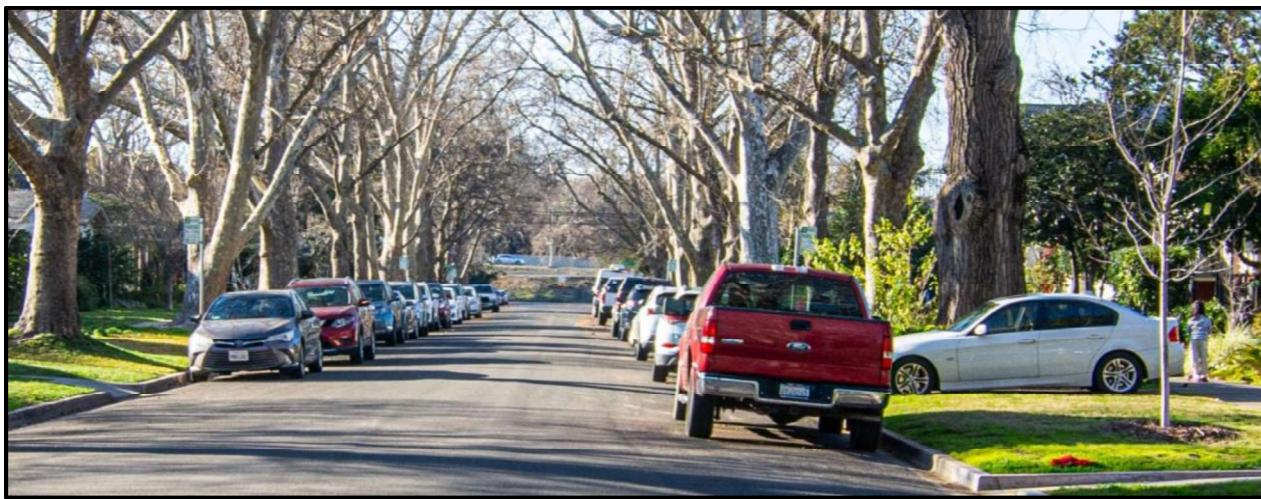


Figure 12 - Streets in Casa Loma Terrace already have traffic and parking problems, photo by Don Cox (HEC).

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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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 Dahlia

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 Dahlia

From: Stacia Cosgrove
Sent: Thursday, February 12, 2026 2:07 PM
To: Zachary Dahlia; 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 uncharacteristic 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 Dahlia

From: Anna Seymour <annaseymour007@yahoo.com>
Sent: Thursday, February 12, 2026 7:57 AM
To: Zachary Dahlia
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 Dahlia

From: Enoch Yeung <pdc.eyeyung@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.

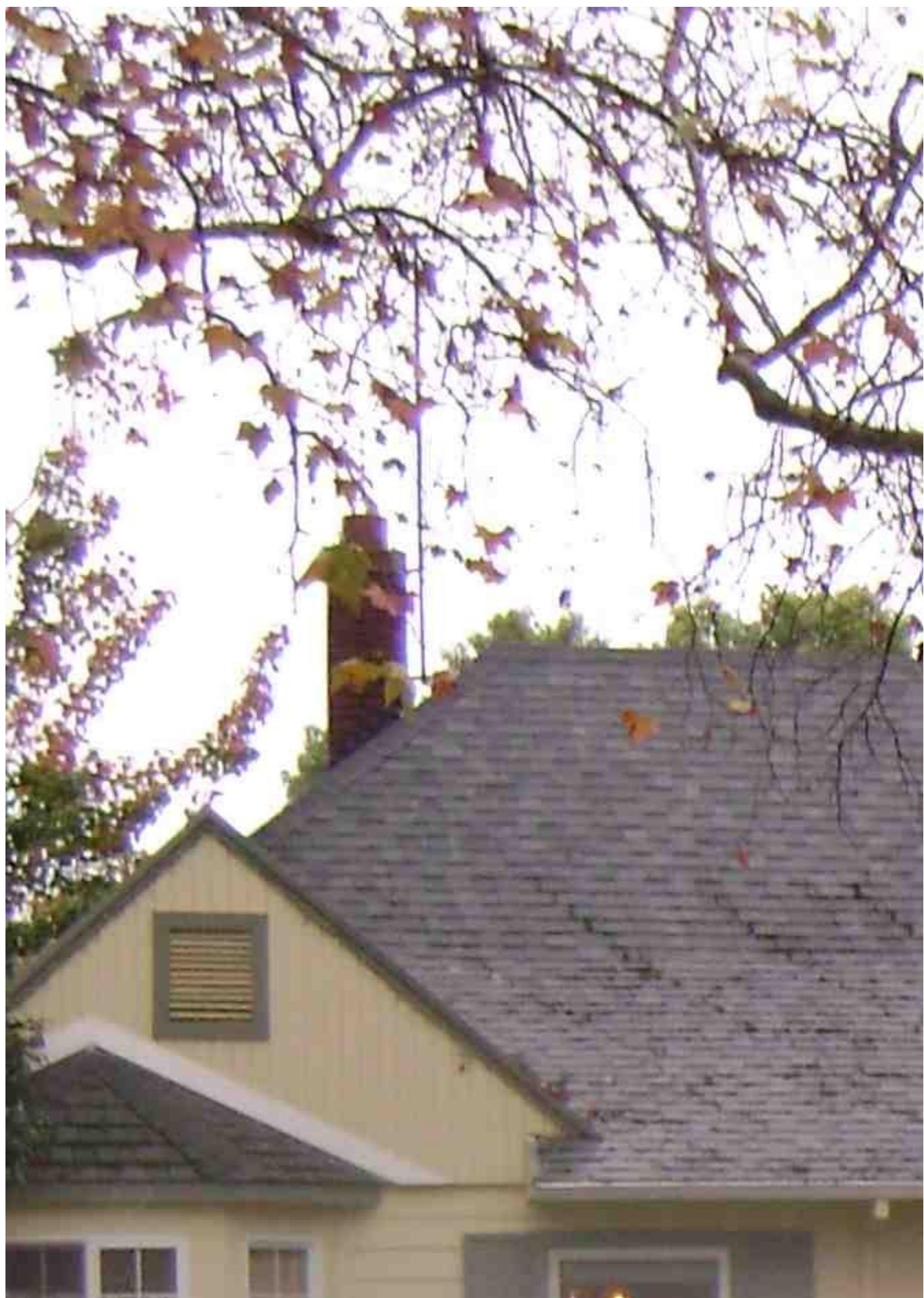
4. See pictures attached: Adding hundreds of toilets to this area's frail sewer system will impact everyone around this area.

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.

Claudia Campbell













Zachary Dahlia

From: Claudia Kirkpatrick <kirkmusic@hotmail.com>
Sent: Thursday, February 12, 2026 10:21 AM
To: Zachary Dahlia; 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 Dahlia

From: Cierra Ramirez <cilramir@gmail.com>
Sent: Thursday, February 12, 2026 10:17 AM
To: Zachary Dahlia; 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 about 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 it 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 Dahlia

From: dgalbrai@surewest.net
Sent: Thursday, February 12, 2026 9:48 AM
To: rkutect@gmail.com
Cc: District 4; Zachary Dahlia; 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, Dahlia-- 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 Dahlia

From: Nancy Cornelius <nanjean23@gmail.com>
Sent: Thursday, February 12, 2026 12:14 PM
To: Zachary Dahlia; rkutect@gmail.com; District 4; Mayor
Subject: Redevelopment Project P24-007

Follow Up Flag: Follow up
Flag Status: Flagged

Zach Dahlia, 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 Dahlia

From: Rob Sawyer <sawyer.rob@icloud.com>
Sent: Thursday, February 12, 2026 11:46 AM
To: Zachary Dahlia; 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 Dahlia,

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.

Zachary Dahlia

From: Brandenburger, David <David.Brandenburger@nmrk.com>
Sent: Thursday, February 12, 2026 1:47 PM
To: rkutect@gmail.com
Cc: Zachary Dahlia; 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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Zachary Dahlia

From: Drew Sutton <sutton916@gmail.com>
Sent: Thursday, February 12, 2026 8:30 AM
To: Mayor; District 4; Zachary Dahlia; 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 Dahlia

From: kerry.kelly443@gmail.com
Sent: Thursday, February 12, 2026 11:37 AM
To: Zachary Dahlia
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 Dahlia

From: Kristine Shultz <kristineshultz@yahoo.com>
Sent: Thursday, February 12, 2026 2:36 PM
To: Zachary Dahlia; 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 Dahlia

From: Lana Wong <lanabellewong@gmail.com>
Sent: Thursday, February 12, 2026 7:31 AM
To: Zachary Dahlia
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 Dahlia

From: Nora <nbrackbill@gmail.com>
Sent: Thursday, February 12, 2026 8:58 AM
To: Zachary Dahlia; 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 Dahlia

From: Peter Saucerman <psaucerman@gmail.com>
Sent: Thursday, February 12, 2026 2:41 PM
To: Zachary Dahlia
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 Dahlia

From: RJones <rjones@uumma.org>
Sent: Wednesday, February 11, 2026 10:18 PM
To: Zachary Dahlia; 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. But I 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 Dahlia

From: William Ostroff <stroff2@hotmail.com>
Sent: Thursday, February 12, 2026 9:45 AM
To: Zachary Dahlia; 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 Dahlia

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 request 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.

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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>