







February 12, 2024

Maya Wallace, Chair, and Members of the City of Sacramento Planning and Design Commission Remi Mendoza, Matt Hertel, and Cheryle Hodge, City Planning Staff Via email

Re: Planning and Design Commission Hearing Jan 25, 2024

Natomas Basin Special Study Area - our request to have it removed from the General Plan

Update

Dear Chair Wallace, Commissioners, and Staff,

Thank you for the excellent discussion on the issue of the Natomas Basin Special Study area during the hearing for the General Plan Update (GPU) on January 25, 2024.

The GPU Land Use and Placemaking Element states on page 3-17, "The Special Study Area (SSA) designation is applied to five potential annexation areas (shown on Map I-2) that may become part of the City in the future after additional studies have identified the fiscal and service delivery implications on City functions."

At the January 25, 2024 hearing, we requested the removal of the Natomas SSA because we want to protect the remaining open space in the Natomas Basin from development. The compelling truth is that if the 7,500 acres for the Upper West Side and Grand Park developments and the 450 acres for the Airport South Industrial project (proposed for annexation in the City) go ahead, the Natomas Basin Habitat Conservation Plan (HCP) will not succeed. Thirty years of work will be wasted constituting a major planning failure for the Sacramento region.

At the hearing we were encouraged when the City's Long-Range Planning Director cited land use provisions in the General Plan that call for the protection of surrounding open space lands, farm and habitat lands; and when the New Growth Manager affirmed the City's commitment to the success of the HCP. We also appreciated commissioner comments that the City's Special Study Area "ensures the City is at the table and has some level of influence on the plans" in Natomas in Sacramento County (referring to Upper West Side and Grand Park).

Sacramento County: We have communicated with County officials on multiple occasions regarding the importance of retaining agricultural land uses and avoiding further urbanization in the Natomas Basin. The HCP strategy depends upon farmland to buffer and support the habitat values of existing and planned preserves. County policies currently protect agriculture in Natomas, and four of five Supervisors are required to approve any change to the Urban Services Boundary, a County General Plan feature which prohibits urbanization in the Natomas Basin, among other areas.

We ask the City Planning Commissioners and staff to do these two things before the City Council approves the GPU:

- 1. To recommend a change to the sentence in the GPU on page 3-17 cited above to either better represent the full range of the City's interests in the SSAs or to keep it simple, like this: "The Special Study Area (SSA) designation is applied to five areas that are of strategic interest to the City because of their proximity to the City."
- 2. To reconcile the potential annexation and development of the South Airport Industrial Project with the City's stated intent to protect open space as described in the GPU, Community Plans: Special Study Areas, page 11-SSA-5, as follows:

Natomas Basin Study Area. . . The Natomas Basin has been of interest to the City for decades in regard to the preservation of open space, agricultural and habitat areas, transportation/circulation, water resources, and planning for municipal services. . . .

The HCPs for the Natomas Basin provide for a conservation strategy to provide protection for 22 covered species. This strategy calls for a significant portion of the basin to be placed in habitat mitigation reserves and on preservation of agricultural operations. The City is committed to preserving open space and agricultural uses that includes a system of wildlife corridors and creates buffers between habitat and development as called for in the Natomas Basin Habitat Conservation Plan and the 2002 MOU.

We ask the City Planning Commissioners and staff to do the following on an ongoing basis:

- To actively support these Sacramento County policies that are protective of open space, habitat, and agriculture; to use your influence as representatives of the County's largest jurisdiction -- with a third of the County's population and two County Supervisors residing in the City.
- To take a more active role in seeking funding for permanent protection of farmland in the Natomas Basin. We are working with land conservancies and would appreciate the City's engagement in this process as well.

Sincerely,

Susan Herre AIA AICP

President of the ECOS Board of Directors

Judith Lamare and James Pachl

Founders, Friends of Swainson's Hawk (FOSH)

Rob Burness

Co-Chair Habitat 2020

Barbara Leary

Sierra Club Sacramento Group