



# SACRAMENTO COUNTY FARM BUREAU

PUTTING THE FOOD ON YOUR FORK SINCE 1917

July 15, 2024

Scott Johnson, Senior Planner  
City of Sacramento Community Development Department  
300 Richards Blvd, Third Floor  
Sacramento, CA 95811  
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## **RE: Airport South Industrial Project**

Dear Mr. Johnson,

The Sacramento County Farm Bureau is a non-governmental, non-profit, grassroots membership organization. Our purpose is to preserve and protect our agricultural economy and rural lifestyle since 1917. Four thousand acres of vital farmland are lost each year to urbanization. There is great concern among farmers and ranchers that not only is the practice of farming and ranching decreasing, but their rural way of life is being threatened. Area growers work hard to supply consumers with high quality products while battling obstacles such as increased production costs and water availability. As the earth's original conservationists, farmers and ranchers have a keen interest in preserving our precious land for future generations. Farmers are concerned with natural resources, animal health, water, and air quality, among other imperative issues. Farm Bureau's voluntary elected leaders and professional staff work hard for all Californians to ensure the rural economy's growth, to protect the family farm, and to maintain the treasured natural resources that are so important to this state's vitality and lifestyle.

The Sacramento County Farm Bureau has several concerns with the City of Sacramento's proposed 373.5 acre Airport South Industrial Project. The Draft EIR further supports the issues that we address with the proposed project. The Draft EIR identifies multiple significant and unavoidable impacts to agricultural land with the proposed project. The City also acknowledges that the non-participating parcels will likely be subject to future development, furthering the loss of additional agricultural land. All this area south of the airport needs to be preserved as agricultural lands for flood control, a buffer for open space, health benefits derived from agricultural lands, wildlife habitat, and a sustainable local food supply.

The Sacramento LAFCo had designated areas as Prime Farmland of which 385.3 acres is located within the proposed project. The farmland within the project has consisted of hay and rice since 1937. While some of the land has been fallow the last few years, the land is still a priceless resource for agriculture in the future and for wildlife. The city acknowledges that the study areas include classified Farmland of Statewide Importance or Local Importance, but then dismisses respect of those classifications by planning to convert those lands to industrial use.



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The city must be cognizant about these classifications to ensure priority is maintained in preserving these limited land resources that cannot be created. Agricultural lands provide numerous benefits to the community including cooler temperatures, cleaner air, a diverse and reliable food supply that often is healthier and cheaper the less distance it must travel, carbon sequestration, producing oxygen essential for humans and wildlife, flood and fire control buffer, groundwater basin sustainability with recharge, and a habitat for wildlife. The technological advances and efficiencies applied to farming practices assist in improving the environment and food quality. Wildlife and agricultural lands have a symbiotic relationship that benefits wildlife survival because of the agricultural practices on those lands. Agricultural lands provide food sources, a living habitat, protection from predators, functional water resources, and spacing needs for both individuals and specie population. Agricultural lands also provide a buffer between the urban and residential areas and the open space/conservation areas to limit wildlife impacts within the residential and urban areas.

We are concerned with how the city perceives to protect agriculture under the Preserving Agriculture section. Under the City of Sacramento 2040 General Plan, Policy LUP-1.11 and 1.12, the City is required to protect and provide appropriate buffers. This project area is already the buffer between the neighboring agricultural land and the urban city. The City also believes it can just move wildlife species to other areas. The wildlife is utilizing this particular area which allows them to thrive. Moving them to other areas only impacts those other areas that already contain populations of various diverse species. This project causes an overall loss of land; therefore, leaving a substantial smaller area for all wildlife to concentrate into for the sake of surviving and thriving. The city needs to protect the actual agricultural lands already here without trying to mitigate with other land that most likely already protected or classified as important. These lands are classified by the State and County as important for a reason and need to remain intact as that. Agricultural land cannot be created; what land is here is all that is left. Trying to substitute other land is not an acceptable or equitable mitigation. The City of Sacramento acknowledges that this project will lead to an overall loss of farmland.

The people on these agricultural lands and rural residences value the land and the livelihood with it. The city needs to understand that these lands assist with lowering the carbon footprint with carbon sequestration, provide a buffer for open space/conservation lands and the wildlife on them, and a buffer for flooding and wildfires. The city is doing a disservice to its own residents and businesses by eliminating agricultural lands from this area. In addition, human health and safety will be threatened. The dismissed alternative project of upgrading a current industrial area, while expensive, would be a better utilization of the area currently within the City's boundary to revitalize and better infill a developed area. Expansion beyond its boundary will be more detrimental overall to permanent loss of the natural land. The City needs to maximize its current area and infill or upgrade deteriorating areas such as one of the alternative projects the project dismissed.



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Our organization has concerns with the perception the city has on how to protect our local food system under Policy ERC-9.12 . While small urban farms are important to the diversity of produce, they cannot sustain a large city like the City of Sacramento. It requires large acreage of good land to grow the quantity and variety of food required to provide a balanced diet and plentiful supply to sustain grocery stores, restaurants, and farmers markets for all residents and guests within the entire city. Having agricultural land close to the city reduces transportation of those foods allowing for a lower carbon footprint, less pollution, fresher and healthier products, and maintains local control with jobs and economic dollars staying in the area. Relying on other areas for a food supply and sending our dollars to those areas is not a sustainable decision. Quality agricultural land is a finite and priceless resource. The cities that preserve these types of lands now will benefit the best later as food, which is essential for life, becomes a very limited resource in most areas.

Agricultural lands and managed conservation areas are the key for carbon sequestration. The City of Sacramento has approved to reach carbon neutrality by 2045 but this project will add to the carbon the City emits. The City needs to preserve this project area in its current state to provide aid in balancing its carbon footprint. The City already has proven its disregard for carbon neutrality when it cut down many old oaks for a urbanization project in Freeport. The project could have easily been designed to include those trees that mostly edged a short section of one side of the project. Oak trees are one of the top carbon sequestration plants in the area. These trees would have greatly offset the carbon emissions for the City, but they chose not to.

It has become extremely apparent that the preservation of agricultural land and open space is not a priority of the City of Sacramento. Absolute consideration of agricultural lands in Sacramento County is imperative to sustain the city with an abundant food supply, carbon sequestration, and wildlife habitat. The City of Sacramento acknowledges these issues and that their project will lead to an overall loss of farmland. This is deemed unacceptable. Therefore, the project should not move forward. Please keep the Sacramento County Farm Bureau informed with any updates and future notices.

Sincerely,

Jerry Spencer  
President