



SACRAMENTO COUNTY FARM BUREAU

PUTTING THE FOOD ON YOUR FORK SINCE 1917

October 9, 2024

Sacramento County,
Department of Community Development, Planning & Environmental Review Division
Attn: Environmental Coordinator
827 7th St, Rm 225
Sacramento, CA 95814
CEQA@sacounty.gov

RE: Upper Westside Specific Plan (State Clearinghouse No 2020100069, County Control Number PLNP2018-00284)

Dear Environmental Coordinator,

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 important to this state's vitality and lifestyle.

The Sacramento County Farm Bureau has several concerns with the Specific Plan that will develop over 1,532 acres and detrimentally impact the remaining 534 acres left of the 2,066 acres in the project area. 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. All this area needs to be preserved as agricultural lands for flood control, health benefits derived from agricultural lands, wildlife habitat, and a sustainable local food supply.

The proposed narrow strip of remaining agricultural land, some as narrow as 700 feet, will be detrimentally impacted by the urban zone. The placement of the elementary school is a poor choice due to the state regulatory requirements placed on agriculture operations. The neighboring school will disrupt production for most of that parcel and will lead to pest and disease outbreaks, food quality and health issues, and crop losses because operational practices



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including pest management will be blocked due to the school's location. In addition, the 30-50 foot buffer gravel access trail and farm fence is not a conducive buffer to protect the agricultural land against food safety hazards, pest infestations, or maintain quality production while also maintaining public safety. The minimum buffer to protect agricultural production needs to be a quarter mile.

This project area is already the needed flood buffer between the river and the urban city. The County needs to preserve this appropriately sized flood buffer which also consists of mostly prime agricultural land. These lands are classified by the State and County as important for a reason and need to remain intact as such. The county needs to protect the actual agricultural lands already here without trying to mitigate with other land that most likely is already protected or classified as important. 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 county 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 also assist in improving the environment and food quality.

These agricultural lands are full of wildlife. 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. The wildlife utilizes this particular area because of the resources the agricultural land provides and allows them to thrive. Moving them to other areas only impacts those other areas that already contain populations of various diverse species. The phasing buildout of this Specific Plan is backwards and will cause major issues for wildlife to be able to migrate from the area and will trap many species in the phasing buildout. Buildout needs to start next to the current existing developed edge and work out from that location to direct wildlife towards the future remaining agricultural land and river. Ultimately, this project causes an overall loss of land; therefore, leaving a substantial small area for all wildlife to concentrate on for the sake of surviving and thriving. Agricultural lands also provide a buffer to limit wildlife impacts within the residential and urban areas.

The DEIR mentions that the City of Sacramento is to provide the water to this new development. Where will the water to supply this new development come from? There will be less groundwater to pull from as around 1,500 acres will now be permanently covered, preventing water to infiltrate down into the groundwater basin. This project reduces the



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amount of water that can recharge this basin and increases the amount of flooding for this and neighboring areas. This land has been in agriculture not only because of its prime soil quality to grow food but also to be a flood buffer for the urban zone. The annual crops grown in this area are grown because the ground is too wet in the winter. It is designated by FEMA as a high-risk flood zone. Developing this low-lying area puts more people at risk and causes more economic damage when flooding occurs. The narrow strip of agricultural land left to be a flood buffer is not large enough. The DEIR points out under PH-1, the contradictory plans of the General Plan and SACOG which will create a huge unplanned population growth of about 25,460 residents in 9,356 housing units of whom will need water, food, and other vital resources that must be obtained and maintained. In addition, the impact of traffic, noise, carbon emissions that previously were very minimal for the area will be greatly elevated and disruptive to the current rural residents' lifestyle. Their way of life will be destroyed. Even the remaining agricultural zone and wildlife will be heavily disrupted and degraded with the bombardment of trash, traffic congestion, trespassing, and other damaging impacts. The people on these agricultural lands and rural residences value the land and the livelihood with it.

Our organization has concerns with the perception the county has of how to protect our local food system. The Project Description states under the Sustainable Community section of incorporating measures that would preserve sensitive habitat and conserve agricultural lands. How can this Specific Plan state that when they will remove 1,324 acres (over 70%) of the agricultural land and the wildlife associated with it? It is contradicting. While small urban farms are important to the diversity of produce, they cannot sustain the region or a large city like the neighboring 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 region. 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. Preserving agricultural land in our county 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.

The County needs to understand this agricultural land currently assists with lowering the carbon footprint with carbon sequestration, provide resources for the wildlife on them, and as a buffer for flooding and wildfires. The County is doing a disservice to its current residents and businesses by eliminating agricultural lands from this area. In addition, human health and safety will be threatened. Agricultural lands and managed conservation areas are the key for carbon sequestration. This project will add to the carbon the county emits. The County needs to preserve this project area in its current state to provide aid in balancing its carbon footprint.



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The County needs to determine the value of all aspects of this project area and not focus on one component that will ruin everything else for the one. In addition, a quick profit for one component but then leaves an entire community in dire straits with potential issues with water availability and quality, food shortages, poor air quality, increased flooding, and climate change is not a valid strategy the County should support. This project area has a lot of State designated Prime Farmland. Most other counties do not have any Prime Farmland. Our county is privileged to have so much abundant prime and statewide important farmland. This makes Sacramento County very valuable as other areas continue to develop more urban centers.

The County needs to support Alternative 2: No project/Existing Zoning as the best option for this area. It has the ideal proper placement, proper growth, proper preservation of resources including land, food, wildlife, water and air quality, and carbon sequestration. As more areas remove agricultural land, the need for food and land to produce food will increase. Preservation of agricultural land for long term options is best in this drastically developing region. Once covered over, the land able to produce food will be gone forever and leaves our county dependent on other areas for the resources vital for human survival. It is a priceless resource we cannot get back.

Absolute consideration of preserving agricultural lands in Sacramento County is imperative to sustain the county with an abundant food supply, carbon sequestration, wildlife habitat, and the local economy. The Draft EIR acknowledges these issues and that this specific plan 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,

Amber McDowell
Executive Director