ECOS
ENVIRONMENTAL
COUNCIL
OF SACRAMENTO

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City of Sacramento Mayor and City Council:

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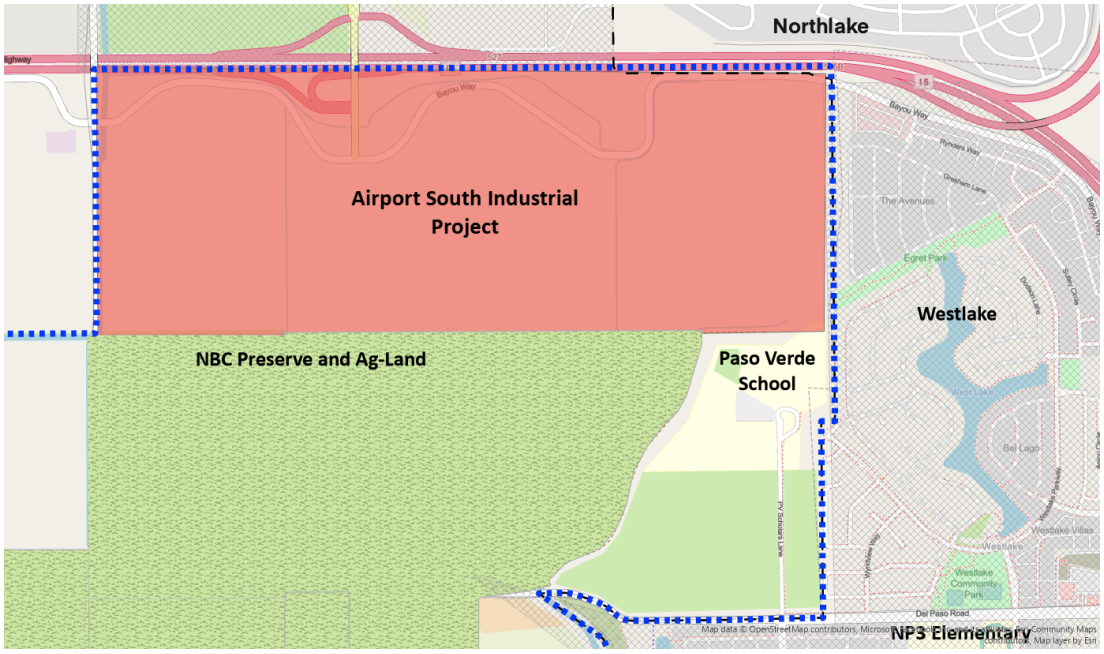
District 8 – Mai Vang – district8@cityofsacramento.org

Dear Mayor and Council,

The Environmental Council of Sacramento (ECOS) is a coalition of environmental leaders, including the Sierra Club Sacramento Group, Sacramento Audubon, Friends of Stone Lakes National Wildlife Refuge, Sacramento Valley Chapter of California Native Plant Society, Save the American River Association, Save Our Sandhill Cranes, Friends of Swainson's Hawk, Sacramento Area Creeks Council, and more. For over 50 years, ECOS has provided a space for action-oriented advocacy, and has fostered partnership between our members, communities, and elected officials. We thank you for the upcoming opportunity to meet with Mayor McCarty on July 31 to discuss the biggest environmental decision to come before the City Council in decades: the Airport South Industrial (ASI) project. Due to the complexity and gravity surrounding this proposed project, we wish to provide you vital information for your consideration ahead of our meeting.

We believe the approval of this project as presented by City Staff will cast a long shadow over the City's and its elected leaders' reputation for protecting citizens and the environment from harm.

Located immediately south of I-5, west of the Westlake residential neighborhood, north of the Paso Verde School, and east of active agricultural land, the 474-acre ASI project proposes to convert farmland and connected habitat into 6 million square feet of warehousing. The proposed project demands the amendment of the Sacramento City sphere of influence (SOI), the City boundary, the Urban Services Boundary (USB), and the Urban Policy Area (UPA). Such policy changes require the involvement of the Natomas Community Planning Commission, the Local Area Formation Commission (LAFCo), the City Planning and Design Commission, the City Council, and the Sacramento County Board of Supervisors.



Location of the proposed Airport South Industrial Project. The project is located outside of the USB (blue dotted line). Natomas Basin Conservancy (NBC) preserve and agricultural land is depicted in the textured green areas. Areas that are purchased for development and that have provided in-basin mitigation in accordance with the Natomas Basin Habitat Conservation Plan (NBHCP) are crosshatched.

ECOS has been following the project since its first appearance on the City Consent Calendar back in June, 2021. We have submitted written and oral comments on the Notice of Preparation (NOP) and Draft Environmental Impact Report, and we attended the relevant LAFCo and City Planning and Design Commission meetings. As such, we feel equipped to provide an overview of the environmental and policy concerns that have been downplayed or misconstrued by the applicant and staff.

The Adoption of the Statement of Overriding Considerations Will Brand the City Leaders as Environmentally Negligent

If the Council certifies the EIR and approves the project, as part of CEQA compliance, the Council will have to adopt a statement declaring that the benefits of the project outweigh the environmental harm.

The environmental impact report (EIR) acknowledges that the proposed project would have significant and unavoidable impacts on agriculture, air quality, and visual aesthetics, but we have also found inadequacies in the EIR in providing information, accurately assessing impacts, and sufficiently mitigating other impacts to less than significant. These inadequacies translate to:

- Increased cancer risks for children and families
- Conflict with the regional air quality plan
- Unmanageable traffic on I-5 and local roads
- Disregard for the City's adopted habitat conservation plan

- Destruction of habitat for many species, including the protected Giant Garter Snake and Swainson's Hawk.
- Added risks to air travel due to the project's 96 acres of detention basins and increased conflict with waterfowl.

Altogether, the environmental harm is heavy and should not be minimized by a statement of "overriding considerations."

Plenty of empty warehousing and vacant land zoned for warehouse uses exist in areas like the Metro Airpark, McClellan Business Park, and elsewhere in Sacramento.

Is new industrial space more important than conserving agricultural land, or more important than honoring our commitments to the air quality plan and Natomas Basin Habitat Conservation Plan? Of course not!

The proposed location next to a school and neighborhood, and on prime agricultural land, is unsuitable for this project.

Why Does Staff Support This Project?

The staff identifies the benefits of the project as the tax revenues the project produces for the City. This amounts to $4 million a year, according to the developer-prepared benefits report. The report, however, is an accounting of expected gross benefits and does not include the costs to the City to serve the project. So, for less than $4 million a year, the City staff is recommending an aye vote.

Bad Public Process Taints The ASI Project with Bad Faith

Thus far, the ASI project has been reviewed in hearings by the County's Natomas CPAC, LAFCo, and the City Planning and Design Commission. All hearings have posed obstacles that have discouraged public engagement. Please don't make this process worse.

The Natomas CPAC hearing was held in a room with a maximum capacity of 25 people. This left little room for attendees beyond the commissioners, the staff, and the presenting applicants. Approximately 50 overflow attendees stood in the hallway, where they struggled to overhear the applicant's presentation. At the following NCPAC meeting, there was sufficient space for the attendees, but the allotted speaking time for public comment was limited to 1 minute per person, with no reduction to the applicant's presentation. The project passed unanimously and was passed on to LAFCo.

Similarly to the Natomas CPAC hearings, the April 2, 2025 LAFCo hearing was well attended, resulting in over 4 hours of testimony, the submission of 900 pages of comments, and 60 speakers opposed to the project. The hearing was continued to May 2, but the staff only made minor changes to the EIR that were not explained at the continued hearing. Public comment was then limited to 10 supporters and 10 opposers, and the commission voted unanimously to amend the SOI and certify the EIR, offering no

justification for their votes. The lack of explanation from any of the commissioners made the vote an ambiguous, unjustified decision to the public.

Once again pushed forward, the project made its way to the City Planning and Design Commission for a recommendation. Despite the controversial nature of the project, made clear by the hours of testimony, hearing continuations, and overflowing written comments to both LAFCo and the Planning and Design Commission, the ASI project was scheduled during the same hearing as another controversial item (the Crocker Village housing project). The commission did not reach the ASI project item until 9:00 PM, after an hour and a half of staff and developer presentations. Public comment began at 10:30 PM, by which point many of the members of the public had left. Only then, at the request of Commissioner Deborah Ortiz, did the commission chair agree to continue the hearing to a later date, despite being asked to do so earlier.

At every step, the public has shown up and engaged in the process. We are not the only folks who have read the EIR, studied the impacts, and listened to the community members who are afraid of the cancer-inducing toxins that their children will be regularly exposed to by diesel trucks, simply when they are at school or playing in their neighborhood. Over 1200 people have signed a petition addressed to you, asking you to deny this project. Petitioners are asking why the staff continues to push forward a project that is unnecessary and that requires the amendment of all local and regional plans. They ask why our local and regional leaders continue to ignore the deafening threat of climate change, an issue that we claim to care about in our plans but overlook in the face of this applicant-requested development project. And they wonder if they can actually do anything to protect the beauty and integrity of the home they love, or if their engagement in public meetings simply contributes to an appealing facade of a democratic, representative process on an already done deal. A repeat of this kind of process at Council will further erode public confidence in City leadership.

To Discuss with City Staff

The EIR is deficient and we have addressed those issues separately during this process. There are three things you should discuss with staff now:

- Council is being asked to approve this project, which is in conflict with the City agreement with wildlife agencies for the NBHCP. The agreement requires agency permits before zoning (see attached excerpt). And yet, City staff has scheduled Council approval before complying with requirements of the NBHCP agreement. <u>Council should insist the City follow the requirements of the agreement.</u>
- The EIR doesn't fully cover the environmental impacts of the parcel closest to the Paso Verde School (Parcel 8) and staff has promised a future Health Risk Assessment and added environmental review. However, recent law (SB 131) would likely exempt Parcel 8 from further review and mitigation because it exempts industrial parcels for "advanced manufacturing" from environmental review. Having no opportunity for public input regarding the use of facilities on Parcel 8 is not a good execution of public process, and it isn't fair to the kids and neighbors. <u>Council should insist upon review, public hearing, and mitigation, if necessary, of any proposed uses on Parcel 8.</u>

- Signed into law in September 2024 and effective January 1, 2026, AB 98 is part of an effort in California to regulate warehousing and trucking activity to reduce emissions and enhance community health by designating truck routes and establishing buffers, among other things. Airport South could be grandfathered in – or the City Council could require the ASI Project to meet the AB 98 design standards.

Consider your legacy when you make your decision

On August 12, 2025, you will be asked to adopt a statement claiming that the benefits of the project outweigh the significant unavoidable impacts on residents and the environment. We urge you not to adopt such a statement.

Whether you consider this locally or regionally, the potential revenue to the City from the project is not worth the cost – to your legacy. There are better ways to balance the City budget than to override 30 years of planning for sustainability and flood the neighbors with air toxins.

Please consider the significant impact that this project would have on the residents, the local environment, our ability to meet regional goals, and on the growth-inducing precedent the City would set for other projects proposed in the Natomas Basin.

According to the EIR, twenty-five unique areas of controversy were raised in agency and public responses to the NOP (Page 3-1 and 3-2 in the EIR; Executive Summary). These concerns range from policy and process (e.g., regional planning conflicts; project feasibility; mitigation deferment) to tangible impacts the project would have on people and place (e.g., significant health risks and environmental degradation).

Despite its length, the list of concerns included in the EIR is incomplete. The list fails to identify the significance of the project's conflicts with the Natomas Basin Habitat Conservation Plan (NBHCP) and its conservation strategy.

Thank you for your consideration and we look forward to our meeting with the Mayor on Thursday.

Sincerely,

Heather Fargo

Heather Fargo
President of the Board of Directors