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City of Sacramento Mayor and City Council

October 21, 2025

Subject: RE: City Council Meeting Agenda, Tuesday, October 21, 2025, Consent Calendar Item # 28 [Pass for Publication] Airport South Industrial Annexation (P21-017), File ID: 2025-01124

Dear Mayor and City Council members –

The Environmental Council of Sacramento (ECOS) asks you to oppose the Airport South Industrial Project. As you review the 10/21/2025 document “[Pass for Publication] Airport South Industrial Annexation (P21-017)” – please consider the issues below:

Natomas Basin Habitat Conservation Plan

How are you going to assure the public and the wildlife agencies that what you propose does not compromise the ability of the Natomas Basin Habitat Conservation Plan (NBHCP, or HCP) to be implemented as approved? The City is a signatory to the Plan.

How will the approval of this project impact the ability of the Natomas Basin Conservancy (NBC) to implement its HCP? Please provide more specific information about the number of acres of mitigating habitat required and planned for this Project, and their location with respects to the HCP boundary and the incorporated vs unincorporated areas of Sacramento County.

How will the City comply with the NBCHP’s requirements for projects outside of the current permit area?

Has the City consulted with California Department of Fish and Wildlife regarding their concerns about this project beyond the formal CEQA communication process? Will you discuss this project’s mitigation with the agency that is responsible for the City’s legal commitment to implement the Natomas Basin HCP, prior to voting on the project?

AB 98

This issue was brought up by Commissioner Larry Lee of the Planning and Design Commission during their meeting of June 26, 2025. AB 98 goes into effect January 1, 2026. Much of AB 98 applies to a project like ASIP. It would make sense to wait to vote on the Project until after the new bill goes into effect.

Location

The EIR did not consider alternative locations for Airport South. For example, why wasn’t Mather considered as an alternative location, where infrastructure is already in place and away from sensitive receptors?

How much of the build out at the Metro Air Park is directly related to supporting the airport? What are future plans for development at MAP and do they include business that could be located elsewhere, such as a hotel or

golf course? Is Airport South Industrial needed for warehouses if MAP is investing in non-airport freight related uses?

Parcel 8

Based on emissions of fine particles from diesel trucks, the EIR calculates a risk of over 9-and-a-half excess cancer cases per million - just under the threshold for mitigation of 10 in a million. However, this assumes no development in Parcel 8, which is closest to residences and Paso Verde elementary school. The EIR states that if Parcel 8 is developed with over a hundred trucks per day, the health risk assessment for cancer would **then** be analyzed.

If Parcel 8 is developed, it would likely push the level of pollutants into the need for mitigation. Who will be responsible for the mitigation? Only the Parcel 8 owner, Northpoint, or the City?

Planning and Design Commission Recommendations

During their consideration of this project on June 26, 2025, the Planning and Design Commission discussed the necessity for this Project to establish more robust plans to protect the community and natural resources than outlined in the EIR. The Commission was particularly concerned about requirements related to setbacks, loading dock placement, and noise. How will these concerns be addressed? Will new conditions regarding setbacks, air quality, and noise be formally published in the EIR and recirculated for public review? What will be the guiding principles for the new conditions?

Conflicts with existing Planning Policies

The proposed Project location falls outside of the County Urban Services Boundary (USB) and Urban Policy Area (UPA). Although these are County plans, what are the implications of the City urbanizing beyond these foundational policies? Would the approval of this project not have precedent-setting impacts to disregard policies like the USB and UPA in favor of future development in the Natomas Basin?

As you vote on this project you must consider the unanswered questions and outstanding issues that remain.

We look forward to your answers before a City Council vote.

Sincerely,



Alexandra Reagan
Director of Operations, ECOS