

# Planning & Design Commission

Meeting Time: 06-26-25 17:30

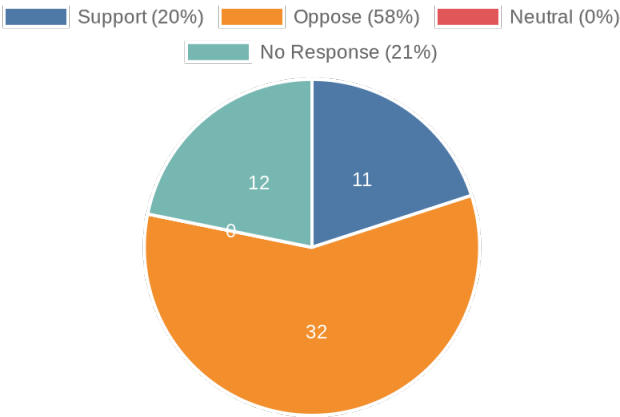
## eComments Report

Meetings	Meeting Time	Agenda Items	Comments	Support	Oppose	Neutral
Planning & Design Commission	06-26-25 17:30	17	55	11	32	0

### Sentiments for All Meetings

The following graphs display sentiments for comments that have location data. Only locations of users who have commented will be shown.

#### Overall Sentiment



Planning & Design Commission

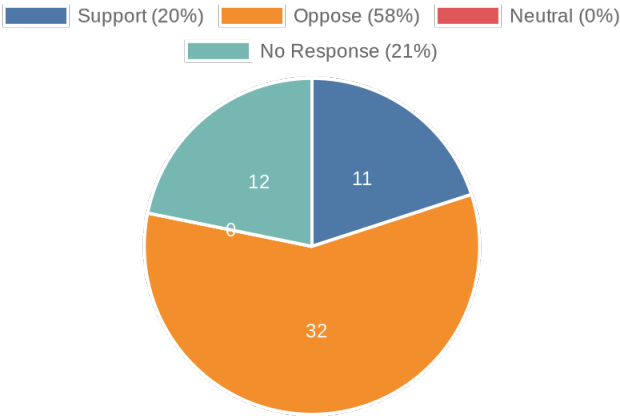
06-26-25 17:30

Agenda Name	Comments	Support	Oppose	Neutral
1. Approval of Planning and Design Commission Minutes File ID: 2025-00275	2	0	0	0
2. Airport South Industrial Annexation (P21-017) [Published 05/02/2025] File ID: 2025-01031	25	11	9	0
3. Birchway at Natomas Apartments Rezone (P24-033) [Published 06/06/2025] File ID: 2025-01142	1	0	0	0
4. Independence in Natomas (P22-047) [Published 06/06/2025] File ID: 2025-00918	22	0	20	0
5. An Ordinance Amending Section 15.08.070 of and Adding Chapter 17.868 to the Sacramento City Code, Relating to Ministerial Approval of Development Projects of 10 or Fewer Dwelling Units on Urban Lots (M25-008) [Published 06/6/2025] File ID: 2025-01145	1	0	0	0
Public Comments-Matters Not on the Agenda	4	0	3	0

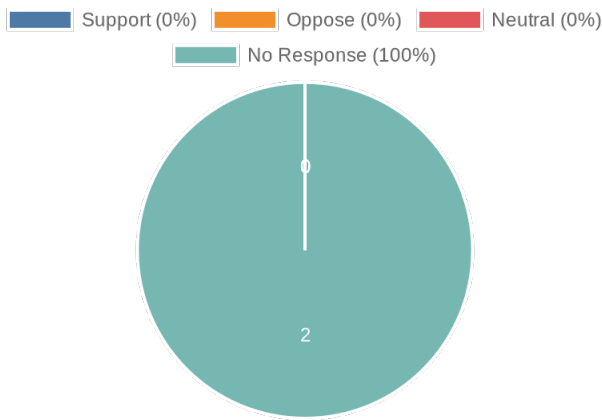
Sentiments for All Agenda Items

The following graphs display sentiments for comments that have location data. Only locations of users who have commented will be shown.

Overall Sentiment



Overall Sentiment



**Sandeep Kaur**

Location:  
Submitted At: 9:00pm 06-23-25

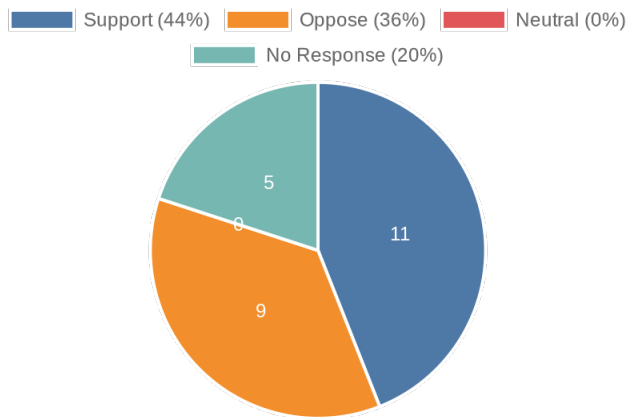
I don't agree with multi-unit development because it will increase traffic, which could negatively impact the safety of pedestrians, particularly children near the school. Furthermore, the proximity of a school raises additional safety considerations. Addressing speeding issues will be crucial if this development moves forward. Already people drive recklessly on streets. We need something which can help the community.

**Mark Rodriguez**

Location:  
Submitted At: 11:16am 06-21-25

Please do not go to Sun Spa, located at 6804 Fruitridge Rd #A  
Sacramento, CA, 95820, They will claim that they are too busy for you.

## Overall Sentiment



### Patricia Johnson

Location:

Submitted At: 4:48pm 06-26-25

To whom it concerns,

I am writing again as a person living in Sacramento who desires to live in a place with clean air for myself and my neighbors. This development will increase traffic, destroy our open space and cause people to suffer life threatening exacerbations of acute breathing problems. Yesterday the traffic was horrendous going north on Highway 5 in the morning and going south in the evening. Please vote against this development.

### Mike Zimmerman

Location:

Submitted At: 4:47pm 06-26-25

I am in full support of the Airport South Industrial development project. Being in the commercial real estate business, I help companies find locations with strong labor pools with superior logistics. Airport South offers all of the above with proximity to the Sacramento International Airport, Interstate 5 and one of the most competitive labor pools in Northern California. This project will help attract great companies with higher paying jobs allowing us to continue grow our region responsibly.

Mike Zimmerman

### Jay Rudin

Location:

Submitted At: 4:46pm 06-26-25

I urge you to reject the Airport South Industrial Project.

This project would pave over farmland and natural habitat, increase diesel truck traffic and greenhouse gas emissions, and pose a serious health risk to children at the nearby elementary school.

It would also cross the Urban Services Boundary — a line this county established over 20 years ago to protect

farmland and limit sprawl. That boundary was supposed to mean something.

Reviewing your official rules of procedure. The first two duties listed are:

1. Stewardship of the public interest must be your primary concern, and
2. You must work for the common good of the PEOPLE of Sacramento — with “PEOPLE” capitalized.

So I ask: Who is this project really for?

It clearly benefits the developer, and likely Amazon. But what about the residents who will breathe the air, lose the farmland, and live with the consequences?

We're told this project will create jobs. But recent articles — including one from The Wall Street Journal — show that Amazon and similar companies are cutting workers and relying more on automation. The jobs that remain often have high turnover due to poor working conditions.

So again: Where is the public good in 4 million square feet of warehouse space?

I see only harm — to the environment, to nearby families, and to the credibility of the Urban Services Boundary.

I respectfully ask you to protect the public interest — and vote no.

Thank you.

Jay Rudin

**Nathan Miller**

Location:

Submitted At: 4:44pm 06-26-25

I am in full support of the Airport South Industrial project. This site will create thousands of sustainable jobs, generate millions in annual tax revenue, and help Sacramento support its continued growth. Industrial development is the backbone of any healthy market as it promotes stable, critical employment, supports all trade of goods and services, and attracts long-term business investment. Without it, we sacrifice our future economic depth and risk seeing much of that business investment focus on other geographic locations. This project is a smart step toward a stronger, more self-sufficient Sacramento.

**Michael Hoo**

Location:

Submitted At: 4:39pm 06-26-25

Dear Commissioners - I urge you to consider the long term benefit a project of this scale could do for the City. Increase the city's tax base and generate additional revenues that could potentially be used to fund multiple municipal services. This project has will typically create thousands of direct and indirect jobs. These include jobs in logistics, warehousing, manufacturing, administration, and supporting services. Additionally, it will generate significant construction job over its development phases. I strongly recommend the support of this project.

Michael Hoo, Colliers

**Irah Shaikh**

Location:

Submitted At: 4:26pm 06-26-25

Dear Commissioners,

I urge you to reject the Airport South Industrial Project and its Annexation into the City. Approving this project would mean amending the General Plan, expanding city infrastructure, and violating the intent of the NBHCP — all to allow warehouse development we simply do not need.

I've identified plenty of sites — totaling over 1113 acres — of vacant or underutilized industrial-zoned land already within 5 miles of the airport which are available for use. Additionally, 65% of that land is within just 2 miles of the Sacramento Airport. These parcels are closer to existing services, don't put pressure on wildlife preserves, and

don't place diesel truck corridors near the 2 neighboring elementary schools and neighborhoods all of which are within an average 1-minute walking distance of the planning site.

And to the argument that even if there is existing warehousing nearby, Airport South still meets the need of commercial sites and hotels, I would like to remind us all that Metro Airpark still has 472 acres available for buildout for the same reasons. To bring that into perspective, if even half of that was to be allocated to hotels with 200-300 rooms, we could have 23 hotels in the area.

This project is not meeting a gap. It's replacing smarter options with more harmful ones. State planning guidance under SB 375 and the Memorandum of Use between the City and the County for Natomas require you to avoid inducing sprawl when feasible alternatives exist. Well — here they do. This project doesn't pass the environmental or planning test when better options are on the table. That is not a valid basis for General Plan amendments, annexation, and rezoning.

Today, you set a precedent for how Sacramento handles future development. A “yes” vote tonight tells the public that speculative warehouse sprawl is more important than the health of our neighborhoods, our children, our farmland, and our wildlife. It says that a developer can submit an Environmental Impact Report that ignores critical legal and environmental obligations — and still get their way.

Please stand with the public, not against it. Vote no. Thank you.

Thank you.

### **Ericah Howard**

Location:

Submitted At: 3:51pm 06-26-25

Dear Planning Commissioners,

I urge you to oppose the Airport South Industrial proposal. Destroying carbon pools that mitigate greenhouse gasses is counterintuitive to long term climate goals. You just approved the urban forest planning, don't go destroying valuable environments in other areas of Sacramento simultaneously. There are TWENTY TWO sensitive species that call the natomas basin home, which you'll be disrupting and endangering with this project. The proposed area is a 100 year flood plain, making development less safe. The plan states a SIGNIFICANT impact on special status plants and animals.

The proposal also explicitly states that the air quality impact during construction alone would be SIGNIFICANT. And all this directly next to Paso Verde Elementary? Not to mention the air quality implications once the project is complete.

I don't believe any mitigation efforts would make this proposal a valid or acceptable plan for our communities and environment.

Thank you

### **Ryan DeAngelis**

Location:

Submitted At: 2:58pm 06-26-25

I fully support the Airport South development project.

As our population grows so does the demand for goods and services. This project will help fulfill that demand serving as the backbone for retail, e-commerce, and services operations in the greater Sacramento region. In addition to serving our community, projects such as Airport South provide good honest jobs. Airport South is a well-designed project and located in an area where we should encourage industrial development, next to an airport. Travel to any major metro market in the country and you will see an airport surrounded by industrial development. The applicant has worked hard listening to various groups and their comments/concerns and have made reasonable attempts to mitigate those concerns. I encourage the Planning Commission to support this project for the many significant economic and community benefits it will deliver.

Ryan DeAngelis, CBRE

### **Bob Dacy**

Location:

Submitted At: 1:56pm 06-26-25

I am in support of this project close to the Sacramento Airport as it eases truck traffic that otherwise would be making longer hauls on other freeways and streets far from the Airport unnecessary. Being blessed with a

location close to the airport development is a huge bonus to the City of Sacramento. Industrial development adjacent to a major airport seems more appropriate than housing that is currently erupting around this area. Please move forward in approving this annexation and development of this property.

**Todd Irving**

Location:

Submitted At: 1:30pm 06-26-25

I am in full support of the future growth and annex of this land. Particularly in area of Commercial and Industrial multi use purposes. With the Sacramento Airport situated nearby, it provides future relief from traffic congestion by providing the opportunity for air shipping and potential rail connections. The growth of nearby neighborhoods has created lots of concerned citizens most opposing this site. They were not opposing the same growth when it provided jobs and affordable homes to them and many others. Long term impact from construction and traffic congestion are not nearly what they are when homes and low-income housing are being incorporated. The future industrial growth will provide more jobs form those already residing in the area.

**BRYCE MACDONALD**

Location:

Submitted At: 1:00pm 06-26-25

I am in full support of the Airport South Industrial development project. It is vital to our region to continue to add industrial real estate sites in order to provide jobs and serve the communities. This is an intelligently planned and well mitigated project that has little environmental impact. Halting industrial real estate growth in a location that is PERFECT for this type of development actually increases costs to the region and its population by pushing companies further away from the population center, thereby increasing pollution and end costs to consumers.

Thank you,

Bryce MacDonald  
(916)705-8366  
bmacdonald916@gmail.com

**Mark Demetre**

Location:

Submitted At: 12:48pm 06-26-25

I've been involved in commercial real estate and development in the greater Sacramento area for over 40 years. This project would be a bonus to the city of Sacramento which lacks any decent industrial development and space available to bring in future population grow services that are necessary for a great community

Mark Demetri, Colliers International

**Saphire Xiong**

Location:

Submitted At: 12:40pm 06-26-25

e-Comment received by the City Clerk's Office.

**Doug Orr**

Location:

Submitted At: 11:17am 06-26-25

Planning and Design Commission members,

Thank you for the opportunity to provide comments regarding the Airport South Industrial Annexation project (P21-017). Natomas Unified is a close neighbor to the project, with Paso Verde K-8 school directly to the south of the project. Paso Verde School serves close to 1,000 students. Natomas Unified has submitted letters with requested revisions on December 5, 2024, March 14, 2025, and May 20, 2025. In the May 20, 2025, letter, we point out our concerns with the proposed use of noise generators and the firing of "blanks" to mitigate the concerns of Canadian geese on the property. With the school's closest building only 250 feet away and students on the playground yard even closer, the firing of "blanks" is concerning, not to mention the noise generation will

interfere with the learning conditions of 1,000 students. In addition, the firing of “blanks” could cause confusion during emergency situations on campus. The plan for mitigation also calls for the use of chemical repellents. Natomas Unified is requesting that any chemical repellants used not be airborne, given the proximity to the school site and playgrounds. Our letter to the Commission, dated May 20, 2025, further details these concerns. Thank you for your time.

Respectfully,  
Doug Orr  
Associate Superintendent, Natomas Unified School District  
1901 Arena Blvd.  
Sacramento, CA 95834

**Chris Smith**

Location:  
Submitted At: 10:50am 06-26-25

Dear Commissioners,

On behalf of the Associated General Contractors of California, please see attached our letter of support for the Airport South Industrial Annexation Project. Thank you for your time and consideration.

**Lisa Kang**

Location:  
Submitted At: 11:43pm 06-25-25

I urge the Planning Commission to oppose the Airport South Industrial Project. If we destroy agricultural land and open space to build warehouses for the Airport South Industrial Project, we'll be wiping out a vitally needed carbon sink. We can't afford to contribute to climate change and spend billions on damage by fire or flood especially during a time when the federal government is working to increase greenhouse gas emissions.

I'd like to draw your attention to a recent KCRA article citing a report from First Street, a climate risk prediction firm that provides data for sites like Zillow and Redfin. The article suggests that the Sacramento area " ... could lose more than a quarter of its population by 2055 due to increased climate risks ... The report points to catastrophic flooding, rising temperatures and worsening air quality as the primary climate risks in the Sacramento metro area."

Full article:  
<https://www.kcra.com/article/sacramento-mass-abandonment-climate-change-risks/64948126>

Mitigating climate change needs to be a top priority in community planning. Please consider recommendations opposing the Airport South Industrial Project.

Thank you for the opportunity to offer my comments on this matter.

**Joyce Wolfe**

Location:  
Submitted At: 8:52pm 06-25-25

I'm writing as a longtime resident of Westlake to reaffirm my opposition to the proposed Airport South Industrial Project and to respectfully urge the Planning Commission to reject this plan in its current form.

Our neighborhood is made up of families who chose to live here because of its peace, safety, and proximity to open space. The proposed project would place high-intensity industrial use—likely involving heavy truck traffic, noise, and pollution—alarmingly close to residential homes, putting our quality of life and health at serious risk.

Let me be clear: we are not anti-development. We welcome responsible growth that considers both economic opportunity and community well-being. But this proposal prioritizes warehouse infrastructure over the health and safety of people. That's an unacceptable tradeoff.

If the project is approved, despite strong community opposition, the city must commit to a legally enforceable



buffer zone between Westlake and the industrial site. This is not merely about visual screening — it's a public health issue. Diesel emissions, noise pollution, and increased traffic from 24/7 logistics operations pose serious risks to nearby residents, particularly children and seniors.

We urge the city to adopt a minimum 1,500-foot setback from the nearest residential property line. This distance is supported by emerging best practices around warehouse siting in suburban areas and reflects the need for real protection, not symbolic mitigation.

Westlake is a neighborhood built on livability, walkability, and family life. This project threatens everything that makes our community special. Please listen to the people who live here — those who breathe this air, walk these streets, and invest in this place every day.

We respectfully ask you to stand with the community and say no to the Airport South Industrial Project as proposed.

**Corinne Gartner**

Location:

Submitted At: 1:51pm 06-25-25

As a resident of the Westlake neighborhood in North Natomas, a concerned citizen, and a mother, I urge you to vote NO on this proposed project. It would be a disaster for the environment, and for the health and quality of life of the families and children who live and go to school in the immediate vicinity. If you make the ill-advised decision to move the project forward, please require a much larger setback, at minimum at least 1500 feet from existing neighboring uses. Anything less would be unconscionable and would demonstrate that the City does not care about the proven adverse health impacts this project would have on the residents and children who live and attend school nearby.

**Jan Schori**

Location:

Submitted At: 1:04pm 06-25-25

Please demonstrate that you have heard the overwhelming concerns of the project's residential neighbors and elementary school parents by voting to require at a minimum a project setback of at least 1500 feet from existing neighboring uses. The benefits of such a mitigation measure are laid out in the EIR's reduced footprint analysis, including a lessening of expected air pollution, visual blight reduction, open space preservation and noise reduction. Jan Schori and Case Buttermann, 191 Lanfranco Circle, Sacramento

**Alexandra Reagan, ECOS Dir. Ops.**

Location:

Submitted At: 11:04am 06-25-25

Dear Chair Yeung and Planning Commissioners,

We look forward to the opportunity to speak to you on June 26, as a continuation of the meeting from May 22, 2025 where the proposed Airport South Industrial Annexation was considered.

As you prepare for this meeting, we are again sharing with you materials relevant to the proposed Airport South Industrial project. We ask that you consider them and ask that you oppose the project.

Please see the attached letter and two maps.

**Bill Motmans**

Location:

Submitted At: 10:30am 06-25-25

So much of our rich history as an agricultural community (Farm to Fork, etc.) is lost when development inimical to that purpose is encouraged. As the Sacramento "region" grows, we lose open spaces as well as agriculture. What was gained by opening up Delta Shores to development? Another Dick's Sporting Goods store? Another under supported cinema complex? What was lost was valuable farm land we will never get back. There are ample other sites in Sacramento which illustrate the same principle. Regardless of the "justification", loss of farm

land and open space should be discouraged.

**Anthony Scalora**

Location:  
Submitted At: 9:25am 06-25-25

Attached is my letter of support for the Airport South Industrial Project which includes the land we own.

**Caleigh Olgeirson**

Location:  
Submitted At: 3:42pm 06-24-25

Dear Commissioners,

On behalf of the Metro Chamber please see attached our letter of support for the Airport South Industrial Annexation Project. Thank you for your time and consideration.

**Mark Rodriguez**

Location:  
Submitted At: 11:17am 06-21-25

Please do not go to Sun Spa, located at 6804 Fruitridge Rd #A  
Sacramento, CA, 95820, They will claim that they are too busy for you.

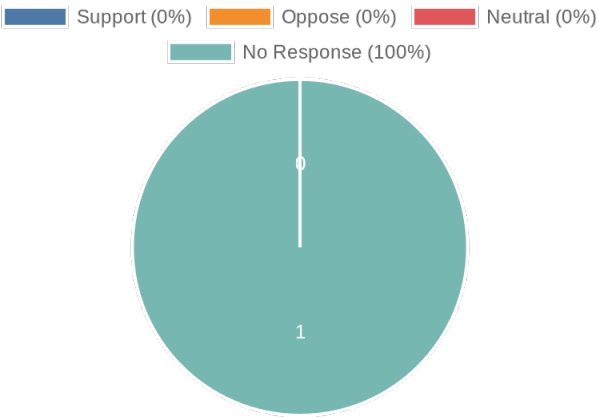
**Jacob Bredberg**

Location:  
Submitted At: 4:39pm 06-19-25

eComment received by the Office of the City Clerk

Agenda Item: eComments for 3. Birchway at Natomas Apartments Rezone (P24-033) [Published 06/06/2025] File ID: 2025-01142

Overall Sentiment



**Mark Rodriguez**

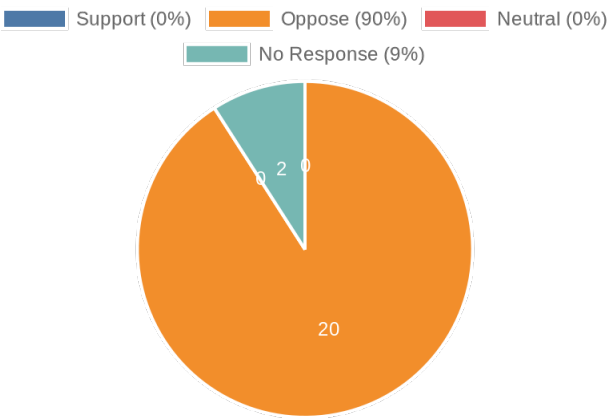
Location:

Submitted At: 11:17am 06-21-25

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Sacramento, CA, 95820, They will claim that they are too busy for you.

Agenda Item: eComments for 4. Independence in Natomas (P22-047) [Published 06/06/2025] File ID: 2025-00918

Overall Sentiment



Jaswinder Saini

Location:  
Submitted At: 9:12pm 06-26-25

The natomas community is highly saturated with apartment complex, smaller home, which are densely packed. If we compare other suburbs or area for housing square footage, natomas will be on top. The roads are less wider as compared to other newly developed area and traffic on north park drive and around this identified location is very bad. Just to get from this location to freeway in the morning take more than 15 minutes now. More housing will just add to the traffic congestion.  
I strongly recommend my council member Karina to oppose this.

Preetinder Singh

Location:  
Submitted At: 7:59pm 06-26-25

I am writing to express concern regarding the government's plan to build new housing for senior citizens in our neighborhood. While I understand the need for such projects, this development could unintentionally increase local traffic, strain public services, and lead to a rise in loitering or property-related crimes. It may also reduce the overall appeal and property values of nearby homes.  
  
I urge the planning committee to reconsider the location or implement stronger community safeguards before moving forward.

Shokt Mhd

Location:  
Submitted At: 3:42pm 06-26-25

I oppose this project because crime rates will be high, our houses values go down no body like to rent or buy a house in such over populated area. There is also car parking problem too much traffic problems because this area already very congested due to schools and small houses and narrow roads and streets. I request to the planners to rethink their proposal. Thanks

**Lia M**

Location:

Submitted At: 3:23pm 06-26-25

I strongly oppose the proposed construction of additional houses and apartment buildings in our neighborhood. This project poses serious concerns for our existing residential community. The area is already densely populated, and the addition of high-density housing will only worsen traffic congestion, parking shortages, and noise levels. There is a school nearby that already contributes to daily overcrowding during drop-off and pick-up hours, adding more residents will intensify these issues and potentially impact student safety. Furthermore, the increased demand on local infrastructure, including roads, utilities, and public services, could reduce the quality of life for current residents and change the quiet, family-friendly character of our neighborhood. I respectfully urge planners to reconsider the location and scope of this development in light of these community-wide concerns.

**Zach Sabac**

Location:

Submitted At: 3:17pm 06-26-25

Rezoning for multi unit dwelling would not benefit the community and the location with that structure does not seem to fit the spacing well. There's a walking path and park along with condos and single home nearby. A structure like a multi unit building will stick out from what is already built. A suggestion is to leave the space alone, build additional single home, or build a community sports court. Something that can be utilized for the already established community. Additional multi unit dwelling would cause bottlenecks in the neighborhood even further where the school is down the road. I oppose the revision.

**Anonymous Young**

Location:

Submitted At: 3:12pm 06-26-25

There should be no further housing developments in this area until after the number of lanes on E Commerce are increased and the 4 way stop sign by the park on e commerce is changed to a traffic light. It currently takes up to 20 minutes to go from artisan square on e commerce to the del paso light during the morning school rush. Adding more housing to this area is going to significantly make this issue worst.

**Jhermaine DeMayo**

Location:

Submitted At: 8:41am 06-26-25

This residential area is already impacted by the increase traffic from the nearby school and this multi dwelling complex would make it so much worse. Congestion issues and safety issues will definitely arise if this rezoning is approved.

This area is a residential community and a complex of this size would change the whole environment of the neighborhood and reason of why we chose this area to purchase a house to live in. We do not want to live next to an apartment complex and do not want the character of our neighborhood to change.

**Denise Whitaker**

Location:

Submitted At: 10:56pm 06-25-25

I oppose this rezoning for this development.

Traffic at the nearby intersection is already an issue, especially when school is in session, and the additional vehicles from a multi-unit dwelling will worsen congestion, increase safety risks, and disrupt traffic flow for residents.

The rezoning will also fundamentally change the neighborhood's character, which is defined by its welcoming,

community-oriented atmosphere. A high-density development will disrupt this balance and diminish the neighborhood's appeal.

Lastly, our schools are already significantly overcrowded. Adding more residents will further overwhelm our neighborhood schools and staff, negatively affecting our children's education.

I urge decision-makers to reconsider this rezoning and pursue alternatives that better align with the community's needs and character.

**Mari Luna**

Location:

Submitted At: 8:33pm 06-25-25

I oppose this plan. We need more infrastructure and schools are getting overcrowded as is. North Park Rd already has heavy traffic in the mornings from two schools.

**Terri Meyer**

Location:

Submitted At: 7:51pm 06-25-25

Please do not build a multi family units. We need single family homes with double garages and additional parking spaces. We need schools, hospitals, a post office and a police station. Let's build what is really needed.

**Sego Cook**

Location:

Submitted At: 7:44pm 06-25-25

Building an appartement complex on this lot is far from a good idea. Traffic is already very bad on this section of north park drive especially when school is in. Session. There are no ways to expand roads to accommodate more traffic that will be brought by such an infrastructure. North Natomas is already having many many developments, along i5, by the Walmart, by Costco etc. This is not the spot for such a complex, people enjoy open land, the community feel so please no rezoning, think about residents interest, not real estate companies/developers for once.

**Sam Pa**

Location:

Submitted At: 7:14pm 06-25-25

I am opposed to this. Please don't build more there. Traffic will be bad

**Jack Vaj**

Location:

Submitted At: 6:47pm 06-25-25

I am opposed to this. Please don't build more there. Traffic will be bad and will cause accidents and maybe even death. The safety for this community comes first. Lots of pedestrian walk that way. Please don't do this. Please don't.

**Meghan Starr**

Location:

Submitted At: 6:42pm 06-25-25

I strongly oppose this rezoning. Traffic is already horrible in this area and this will just cause it to only get worse. This will decrease property values and increase the density and change character of our neighborhood for the worse. There is already an increase in petty crimes with zero increase in police patrols. Allowing building height requirements to increase would drastically change not only the neighborhood but the city park right behind it and the community garden.

Please oppose this rezoning request so we can keep the integrity of our neighborhood and local park.

**Ramandeep Singh**

Location:

Submitted At: 3:09pm 06-25-25

I don't agree with this. I strongly oppose because it will increase traffic and crime in this area. There is already a lot of bad things going on in this area. Furthermore, the proximity of a school raises additional safety considerations. Addressing speeding issues will be crucial if this development moves forward.

**CAROLYN CANETE**

Location:

Submitted At: 1:10pm 06-24-25

Regarding the proposed rezoning of the 10.8-acre land from the Single-Unit or Duplex Dwelling (R-1A-PUD) zone and Creekside Planned Unit Development (PUD) to Multi-Unit Dwelling (R-2A-PUD) zone, the tentative parcel map request for 170 residential units of 85 buildings with a deviation for non-standard street section, and deviations to rear-yard setback and accessory height requirements:

We, Carolyn Canete and Raymond Canete, who live one very short block away from the proposed rezoning and requested deviations, are adamantly against the rezoning and requested deviations for the following reasons:

1. Introducing a multi-unit development will negatively impact property values in our area, particularly those who, like us, live in close proximity to the project.
2. Increased density will strain infrastructure such as roads (North Park is already a highly traveled road, especially before and after school hours), schools (leading to overcrowding), and water and sewage systems since they were built with the expectation of single or duplex dwellings.
3. Noise pollution will increase due to increased traffic and the density of multi-unity dwellings. We already suffer from the planes flying overhead to and from the Sacramento International Airport.
4. Our neighborhood character will be altered, including the loss of the sense of community single-family homes provide.
5. Greenspace will be reduced both by the construction of the multi-unit dwellings and by the rear-yard deviation, which will increase urban heat and affect air quality, negatively impacting our community, the Wild Rose Community Garden just north of the proposed project, and walkers/bikers on the trail on the east side of the project.
6. Any deviation from accessory height requirements will impact the character and vibe of our community.

In summary, the negative impacts of the construction and use of 170 residential units in 85 buildings far outweigh any perceived advantage. We implore you to keep the zoning as it currently is, and not to consider allowing any deviations.

**Gurtej Singh**

Location:

Submitted At: 9:50am 06-24-25

I am writing to express my strong opposition to the proposed multi unit dwelling in our neighborhood. I believe that this project would have a detrimental impact on our community. This will increase traffic congestion, noise pollution. which could negatively impact the safety of pedestrians, particularly children near the school. Furthermore, the proximity of a school raises additional safety considerations. Addressing speeding issues will be crucial if this development moves forward.

**Sandeep Kaur**

Location:

Submitted At: 8:58pm 06-23-25

I don't agree with multi-unit development because it will increase traffic, which could negatively impact the safety of pedestrians, particularly children near the school. Furthermore, the proximity of a school raises additional safety considerations. Addressing speeding issues will be crucial if this development moves forward. Already people drive recklessly on streets. We need something which can help the community.

**Vernice Jackson**

Location:

Submitted At: 5:05pm 06-22-25

We do not need any multi unit dwelling in this neighborhood, Ive been a resident of Creekside once it developed we were originally told that the vacant lot proposed for a skate park in the area which was built further down Kankakee Drive. NE Corner of North Park and Kankakee Drive is a disaster already let me give you example when school is in session H Allen Elementary I have a video camera that does 10,000 clips a month not set on animals but traffic as well as people walking. When school is not in session it is 8000 clips a month which both go over the clip amount.

NE Corner of North Park Drive and Kankakee needs a stop light not a stop sign!! There are so many homeless up and down North Park Drive in cars dropping trash on corners it's ridiculous Ive have called 311 so many times. We need a fire department and more officers driving up and down the community. The value of house will deplit that's why we choose here but over the years it's getting worse. I like the parks available which is very nice, but I don't have my grandmother cross this street she loves walking. People fly up and down both streets like it a freeway all times of day. In the morning when I leave or my husband leaves it's so hard to get out the driveway because traffic is backed up!!! Go back to drawing board of this corner been vacant over 20 years, this proposal is nightmare.

**Christina Ts**

Location:

Submitted At: 11:38pm 06-21-25

The request for a rezone of a Multi-Unit Dwelling zone is not favorable. I currently live in the surrounding neighborhoods and recently purchased a home a few years ago. I enjoy the parks and the community that is built in the area. This proposal is new to me and feel that the revision would cause more issues for the neighborhood community. The revision will cause higher traffic flow. The single street on North Park Drive that leads to H. Allen Elementary School already has high bottleneck traffic during the school year. The design of a Multi-Unit Dwelling is not favorable as it will potentially impact our property values in the neighborhood negatively. The idea of having a Multi- Unit Dwelling does not fit our community needs and will stand out in the community of single homes. I oppose this revision and suggest additional suburban homes with an appropriate rear-yards or an active community center for locals. Please reconsider the revision.

**Mark Rodriguez**

Location:

Submitted At: 11:18am 06-21-25

Please do not go to Sun Spa, located at 6804 Fruitridge Rd #A  
Sacramento, CA, 95820, They will claim that they are too busy for you.

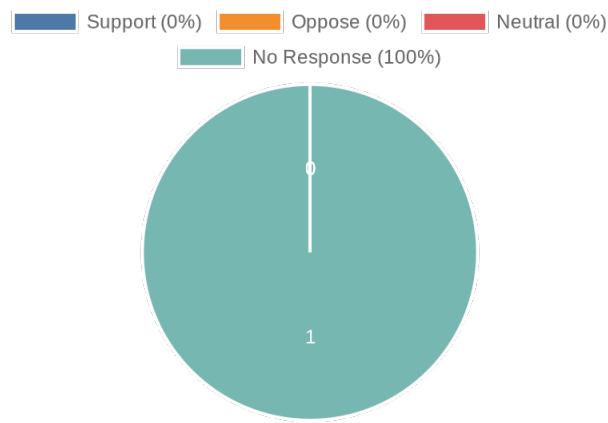
**Saphire Xiong**

Location:

Submitted At: 8:24am 06-20-25

e-Comment received by the City Clerk's office.

Overall Sentiment



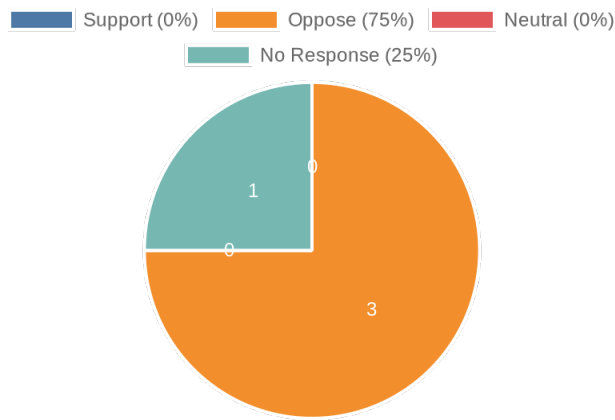
Mark Rodriguez

Location:  
Submitted At: 11:18am 06-21-25  
Please do not go to Sun Spa, located at 6804 Fruitridge Rd #A  
Sacramento, CA, 95820, They will claim that they are too busy for you.



## Agenda Item: eComments for Public Comments-Matters Not on the Agenda

### Overall Sentiment



### Harprit Nijjar

Location:

Submitted At: 9:13pm 06-23-25

Considering the proximity of the school, the introduction of a multi-unit complex warrants careful consideration. The potential increase in traffic and density could pose challenges for the safety and well-being of the students and community. Furthermore, it's important to address concerns about the impact on existing infrastructure and resources. Ultimately, a thoughtful approach is needed to balance development with the established character of the area.

We want service like fire station or other community for older people in our area, not multi-unit buildings.

### Sandeep Kaur

Location:

Submitted At: 9:02pm 06-23-25

I don't agree with multi-unit development because it will increase traffic, which could negatively impact the safety of pedestrians, particularly children near the school. Furthermore, the proximity of a school raises additional safety considerations. Addressing speeding issues will be crucial if this development moves forward. Already people drive recklessly on streets. We need something which can help the community.

### Mark Rodriguez

Location:

Submitted At: 11:19am 06-21-25

Please do not go to Sun Spa, located at 6804 Fruitridge Rd #A  
Sacramento, CA, 95820, They will claim that they are too busy for you.

### Rosa Lane

Location:

Submitted At: 11:08am 06-20-25

April 2025 the residents of 930 Blaine Avenue were sent notice DR25-042, R-3 Zone ( application states R-1 on

Agency Counter), of a 15-Unit Plan to build duplexes on an undeveloped street. The Blaine Avenue Residents were unaware of this plan; Therefore, a notice sent in April of 2025 informing of the DR25-042 project was a big surprise. With research, it was discovered that the City Council approved of a Missing Middle Housing ordinance in which 930 Blaine Avenue now is targeted.

What and how do we find out if it goes before any board to discuss this building for approval?

The Plan for DR25-042 is under False Premise of MMH

The City's MMH Document is for "middle" housing, behind a current single-family home. Thus, blending into existing residential neighborhoods. This plan DR25-042 is not blending and not what it is. The plan is also being advertised on a San Francisco website by an Andrew Nelson, Editor (SFYIMBY, Yes in My Neighborhood), and not Sacramento. The middle housing plan is for Sacramentans only. This plan is being publicized outside of Sacramento and not to Sacramentans.

No on DR25-042 at 930 Blaine Avenue at District 2: This 15-unit plan will have public sewage, streetlights, sidewalks, while the current Blaine Avenue location does not have public sewage, which we are currently paying for, of which our rate is soon to increase to \$47/month. The plan is not conducive to Blaine Avenue's rural, dead-end street, with no drainage, no off-street parking, and a narrow and single lane road. Emergency vehicle access is limited. On the City of Sacramento Agency Counter, the original application was half completed, the form for Trees DR25-042 is for another street location, not Blaine Avenue.

It is cruel to build this 15-unit plan with sidewalks, public sewage, public lighting and leave the current neighborhood without these services, who are currently paying for such services. We are a residential street of working/retired/family people and do not know the protocol and/or procedures to protest DR25-042 project. Every time we upload an eComment or email a concern to the Urban Design Staff Person, the plan gets increased. The original plan for the Agency Counter stated 7 units and is now increased to 15 units. We feel we are communicating with an organization that is not interested in the concerns of the Blaine Avenue Sacramento Residents; or maybe we are communicating with the wrong departments. We would not know.

The residents on this quiet street would like directions regarding who and when to contact the appropriate authorities in relation to this matter. Looking at Planning & Design Commission Council meetings, this project is small in comparison to the projects presented to the committee; therefore, what is appropriate to oppose this plan? Who do we talk to? We have presented this to the City Council and uploaded eComments. Calling and emailing the Urban Design Planning Division directly results in the plans being doubled in size.

Respectfully submitted, Neighborhood Resident of 930 Blaine Avenue Oppose DR25-042

## Sacramento City Planning and Design Commission

RE: Airport South Industrial Annexation Project (P21-017)

On behalf of the Cayocca & Scalora families who are owners of property- (Parcel 8)- which is within the proposed area - we strongly endorse the City staff's recommendations and request that you adopt and follow them.

Our property was purchased and has been owned by us since 1960 and was farmed for over 50 years and then came homes on our east and a school to our south.

It became virtually impossible to continue farming and so our land sits idle except for trespassers, homeless and illegal trash dumping.

We have been losing the ability to utilize our land for farming as a result of the changes that have occurred in the area.

Over the past 50 years, we have seen the farmland near us be developed with residential development and a school when that area was once viable productive agriculture.

We are losing our land little by little by surrounding it with other uses and then then being told we cannot develop our land because of those other uses.

As for the North Point request before you, we need to differentiate Participating vs Non-Participating parcels –

**Non-Participating** - that just means that our parcel has not been committed as a financial project applicant participant to the North Point Development Project -

although the environmental evaluation and recommended mitigation for the potential future development of the annexation area includes calculations that attribute certain amounts of traffic, pollution and other items to us - **for calculation purposes only.**

The issues raised, concerning **our** property are threefold – Habitat, Traffic and Pollution.

For clarity's sake - **for our property**, please consider the following:

As for habitat concerns our property is already covered by the Natomas HCP and there is no evidence that shows it will be disregarded or violated. And to suggest otherwise is disingenuous.

Any future development of our property will comply with the Natomas HCP which greatly benefits and supports the ultimate completion of the HCP conservation plan.

As for the suggested traffic/pollution problems although included in the proposed development plan, **we have not proposed any roadways or anything that creates or emits pollution on or from our property.**

Further, there is only one road proposed by North Point near our property and that is at the north edge of our acreage (approximately 1/4-1/2 mile to the school) about the same distance as Del Paso Road is to the school) and there are no roads proposed on the east (Westlake) side or south (School) side of our property.

Regarding barriers/berms - there is already a barrier on the eastside of our property between us and the West Lake development that is approximately 200' wide.

In addition, we have been cooperating with the City staff and have been agreeable to provide an additional buffer on our property that results in greater open space buffer separator.

We agree with the recommendations and findings and urge you to follow them and allow us to utilize our property in an appropriate manner.

We should be given the same fair opportunity for future development of our property as was granted by the City to the development that became our residential and school neighbors.

Given our history with this land and the diminution in means to utilize it, we believe it only fair and reasonable to allow us to go forward and follow the City's recommendations.

Anthony Scalora

## Saphire Xiong

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**From:** City's Boards and Commissions Program  
**To:** Agenda  
**Subject:** RE: AGENDA ITEM 2, June 26, 2025, Airport South Industrial Annexation (P21-017)  
[Published 05/02/2025] File ID: 2025-01031

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**From:** Alexandra Reagan <[office@ecosacramento.net](mailto:office@ecosacramento.net)>  
**Sent:** Wednesday, June 25, 2025 10:18 AM  
**Subject:** AGENDA ITEM 2, June 26, 2025, Airport South Industrial Annexation (P21-017) [Published 05/02/2025] File ID: 2025-01031

Dear Chair Yeung and Planning Commissioners,

On behalf of the Environmental Council of Sacramento, I am submitting by way of this email our comments on AGENDA ITEM 2, June 26, 2025, Airport South Industrial Annexation (P21-017) [Published 05/02/2025] File ID: 2025-01031. Attached please find our letter, as well as two maps referenced in the letter.

Regards,

**Alexandra Reagan** (she/her)  
Director of Operations  
Environmental Council of Sacramento (ECOS)  
P.O. Box 1526, Sacramento, CA, 95812  
Cell: (916) 765-4977  
Email: [office@ecosacramento.net](mailto:office@ecosacramento.net)  
[www.ecosacramento.net](http://www.ecosacramento.net)





**ECOS**  
ENVIRONMENTAL  
♦ COUNCIL ♦  
OF SACRAMENTO

Post Office Box 1526 | Sacramento, CA 95812-1526

June 24, 2025

Sacramento City Planning and Design Commission  
Enoch Yeung (Chair)  
Robert Chase (Vice Chair)  
Robert Blunt  
Nicolina Hernandez  
Dov Kadin  
Julio Lamas  
Larry Lee  
Kendra Macias Reed  
David Nybo  
Deborah Ortiz  
Erin Reschke  
Ginger Thompson

Sent by email to: [clerk@cityofsacramento.org](mailto:clerk@cityofsacramento.org) , [rblunt.sac@gmail.com](mailto:rblunt.sac@gmail.com),  
[rkutect@gmail.com](mailto:rkutect@gmail.com), [pdc.nicolina@gmail.com](mailto:pdc.nicolina@gmail.com), [DovKadinPDC@gmail.com](mailto:DovKadinPDC@gmail.com), [lamas.pdc@gmail.com](mailto:lamas.pdc@gmail.com),  
[pdc.larrylee@gmail.com](mailto:pdc.larrylee@gmail.com), [kreed.pdc@gmail.com](mailto:kreed.pdc@gmail.com), [nybosacpdc@gmail.com](mailto:nybosacpdc@gmail.com),  
[Commissiondeb@gmail.com](mailto:Commissiondeb@gmail.com), [erinreschke.pdc@gmail.com](mailto:erinreschke.pdc@gmail.com), [ginjerthompson.pdc@gmail.com](mailto:ginjerthompson.pdc@gmail.com),  
[pdc.eyeueng@gmail.com](mailto:pdc.eyeueng@gmail.com)

**SUBJECT: AGENDA ITEM 2, June 26, 2025, Airport South Industrial Annexation (P21-017) [Published 05/02/2025] File ID: 2025-01031**

Dear Chair Yeung and Planning Commissioners,

We look forward to the opportunity to speak to you on June 26, as a continuation of the meeting from May 22, 2025 where the proposed Airport South Industrial Annexation was considered.

As you prepare for this meeting, we are again sharing with you materials relevant to the proposed Airport South Industrial project. We ask that you consider them and ask that you oppose the project.

We have created links to several documents and attached two maps

1. The Natomas Basin Conservancy would be effectively destroyed by the proposed projects.  
[Read the NBC letter.](#)

2. ECOS has expressed a wide range of concerns about impacts to existing agreements such as the Urban Services Boundary, the NBHCP, the NBC, roads, traffic and more. [Read the ECOS letter to the Commission of May 21, 2025.](#)
3. N Magazine, a Natomas on-line magazine, recently published an article about development in Natomas. [Read the article.](#)
4. I recently created a video expressing my thoughts and concerns about the Airport South Project. [See it here.](#)

Attachments:

- Map 1: Developments and USB – Shows the major projects proposed outside the USB as well as the USB, mitigation land, and the Swainsons' Hawk Zone. Acreage of the proposed projects:
  - GrandPark Southwest – 1,871 acres
  - GrandPark Brookfield – 3,485 acres
  - Airport South Industrial – 447 acres
  - Upper Westside – 2,066 acres
- Map 2: Airport South Neighbors – Zooms in to show the land use closest to the proposed project.

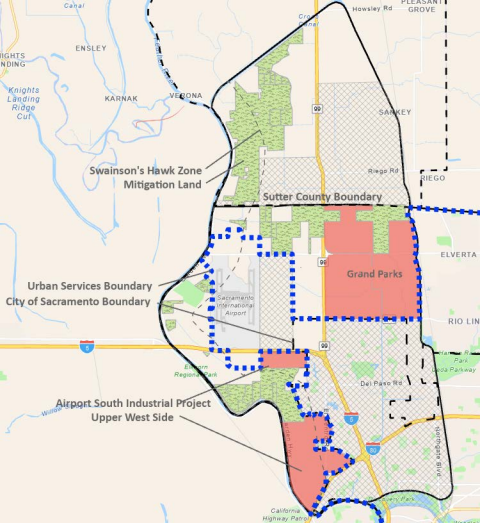
Thank you for your consideration.

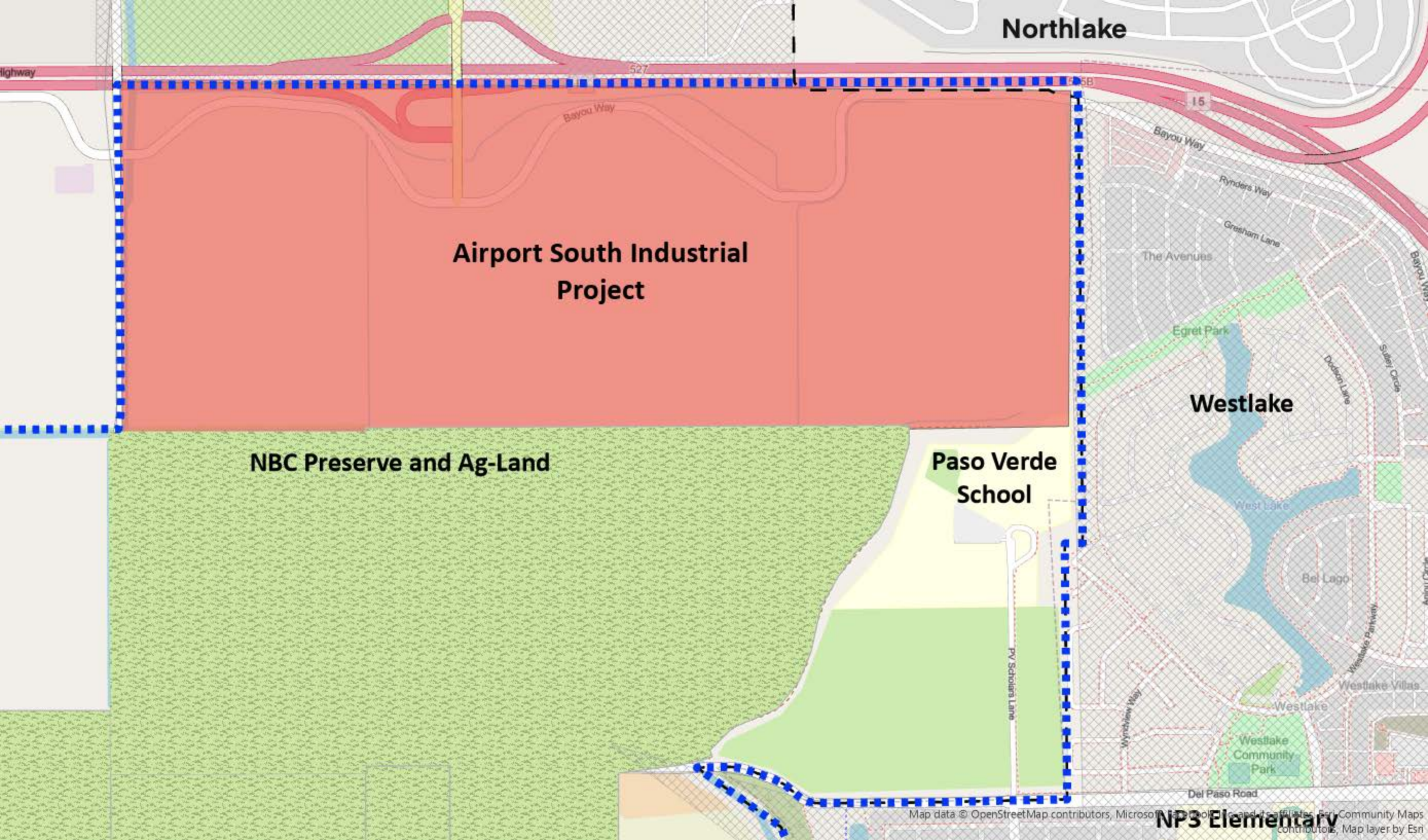
Sincerely,

A handwritten signature in blue ink that reads "Heather Fargo". The signature is written in a cursive, flowing style.

Heather Fargo  
President of the Board of Directors







Northlake

Airport South Industrial  
Project

NBC Preserve and Ag-Land

Paso Verde  
School

Westlake

NPS Elementary

Map data © OpenStreetMap contributors, Microsoft, Bing, and its affiliates, Esri Community Maps contributors, Map layer by Esri



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Granite Construction  
Company

**PRESIDENT-ELECT**

Ryan Aukerman  
Griffith Company

**TREASURER**

Allison Otto  
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3095 Beacon Blvd.  
West Sacramento, CA 95691  
Office: 916.371.2422  
Fax: 916.371.2352  
member\_services@agc-ca.org

**June 26<sup>th</sup>, 2025**

City of Sacramento, Design Review Commission  
815 I Street  
Sacramento, CA 95814

**RE: Support for the Airport South Industrial Project**

Dear Chair Yeung and Members of the Commission,

On behalf of the Associated General Contractors of California (AGC), I am writing to express our strong support for the Airport South Industrial Project.

AGC represents approximately 1,000 contractor and associated construction members throughout the state. Our members build our state's critical infrastructure and represents the full spectrum of the construction industry. We recognize the critical role that well-planned industrial development plays in driving economic growth and creating sustainable jobs in our region. The Airport South Industrial Project represents a significant investment in Sacramento County's future—one that will generate thousands of construction and permanent jobs, while enhancing the County's competitiveness in logistics, manufacturing, and goods movement.

With direct access to key transportation corridors and proximity to Sacramento International Airport, this project is ideally located to attract new businesses and support long-term regional economic expansion. It will help address the growing demand for modern industrial space while providing high-quality employment opportunities across a range of skill levels, including construction trades, operations, and facility management.

We urge the Commission to move this project forward and stand ready to support its timely development. This is the type of infrastructure investment that strengthens the local economy, broadens the tax base, and supports working families throughout the city of Sacramento.

Thank you for your consideration.

Sincerely,

Chris Smith

Senior Director, Government Affairs, Northern California  
Associated General Contractors of California



## Saphire Xiong

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**From:** Agenda  
**To:** clerk  
**Subject:** RE: Comments, ASIP proposal, PDC 6/26 Agenda item 1

---

**From:** Chris Paros <[chrisp552@gmail.com](mailto:chrisp552@gmail.com)>  
**Sent:** Thursday, June 26, 2025 11:07 AM  
**To:** clerk <[clerk@cityofsacramento.org](mailto:clerk@cityofsacramento.org)>; [rblunt.sac@gmail.com](mailto:rblunt.sac@gmail.com); [rkutect@gmail.com](mailto:rkutect@gmail.com); [pdc.nicolina@gmail.com](mailto:pdc.nicolina@gmail.com); [DovKadinPDC@gmail.com](mailto:DovKadinPDC@gmail.com); [lamas.pdc@gmail.com](mailto:lamas.pdc@gmail.com); Larry Lee <[pdc.larrylee@gmail.com](mailto:pdc.larrylee@gmail.com)>; Kendra Reed <[kreed.pdc@gmail.com](mailto:kreed.pdc@gmail.com)>; [nybosacpdc@gmail.com](mailto:nybosacpdc@gmail.com); [Commissiondeb@gmail.com](mailto:Commissiondeb@gmail.com); [erinreschke.pdc@gmail.com](mailto:erinreschke.pdc@gmail.com); [ginjerthompson.pdc@gmail.com](mailto:ginjerthompson.pdc@gmail.com); [pdc.eyeueng@gmail.com](mailto:pdc.eyeueng@gmail.com)  
**Cc:** Lynn Lenzi <[lynnlenzi1@yahoo.com](mailto:lynnlenzi1@yahoo.com)>; Lisa Pray <[lisa@crabray.com](mailto:lisa@crabray.com)>; Mateo Ramirez-Mercado <[mrmercado@cityofsacramento.org](mailto:mrmercado@cityofsacramento.org)>  
**Subject:** Comments, ASIP proposal, PDC 6/26 Agenda item 1

Commissioners,

My name is Chris Paros and I am a 25-year resident of Natomas, with 18 years living in North Natomas. I urge you to **OPPOSE** the Airport South Industrial Project (ASIP) annexation & EIR approval (6/26/25 Agenda item 1).

A few of the many reasons to deny this project are:

1) It sets a dangerous precedent.

What will other developers do when they see this developer was able to buy cheap land outside the Urban Services Boundary (USB) & make a big profit by just getting the city to annex it?

Your approval will start the train that says "Welcome" to leapfrog SPRAWL beyond Natomas' USB, and "Goodbye" to ALL the remaining farmland & wildlife habitat in the Natomas basin.

2) LAFCO commissioners violated their own policy 6 when they approved ASIP. Notice no commissioners stated *why* they approved ASIP. What was the justification for violating LAFCO policies? LAFCO policy 6 states that "...no proposals containing prime Ag land will be approved if sufficient alternative land exists in the Sphere of Influence (SOI)". There is plenty of alternative land right in Natomas already. Uphold the policy or it will be ignored in the future.

3) This project is wholly incompatible with the many homes right next to this project site that have been there for over 20 years.

The EIR shows SEVEN SIGNIFICANT UNAVOIDABLE (or cumulative) IMPACTS that are being waived. Plus the **Cancer risk of 9.5** should have also been designated SIGNIFICANT (10).

How would you feel if the city dumped a huge industrial project next to your home and your child's elementary school?

**Please represent us. Treat this project as if it was next to your home & neighborhood.**

Sincerely,

Chris Paros  
North Natomas resident

## Saphire Xiong

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**From:** clerk  
**Sent:** Thursday, June 26, 2025 11:48 AM  
**To:** Agenda  
**Subject:** FW: Comments, Airport South Industrial Project, 6/26/25 Agenda item 1  
**Attachments:** Comments5\_SacCityPDC\_SOIAprsntn\_CParos\_2025-0626.pdf

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**From:** Chris Paros <chrisp552@gmail.com>  
**Sent:** Thursday, June 26, 2025 11:46 AM  
**To:** clerk <clerk@cityofsacramento.org>; rblunt.sac@gmail.com; rkutect@gmail.com; pdc.nicolina@gmail.com; DovKadinPDC@gmail.com; lamas.pdc@gmail.com; Larry Lee <pdc.larrylee@gmail.com>; Kendra Reed <kreed.pdc@gmail.com>; nybosacpdc@gmail.com; Commissiondeb@gmail.com; erinreschke.pdc@gmail.com; ginjerthompson.pdc@gmail.com; pdc.eyeung@gmail.com  
**Cc:** Lynn Lenzi <lynnlenzi1@yahoo.com>  
**Subject:** Comments, Airport South Industrial Project, 6/26/25 Agenda item 1

Commissioners & Clerk,

Attached is a resend of my powerpoint presentation sent previously that shows maps of undeveloped land currently available in the Natomas USB plus other details.

I again urge you to **OPPOSE** the Airport South Industrial Project (ASIP) annexation & EIR approval (6/26/25 PDC agenda item 1)..

ASIP is not needed or wanted by Natomas residents. We already have enough pollution from the freeways, Metro Air Park, and the airport.

Would you want your children to attend the elementary school nextdoor?

ASIP will also use a huge amount of water yearly that was not planned for. Don't expect residents to conserve when the City has plenty of water for this project.

Please OPPOSE this huge, unneeded annexation that undermines our neighborhoods & quality of life.

Sincerely,  
Chris Paros

Does the  
Airport South Industrial (ASI)  
Merit City Annexation?

Chris Paros  
25-year Natomas Resident

# Compelling Need to Annex? NO.

- **Metro Air Park Available in Urban Services Boundary**
  - **12 Vacant** Warehouse Buildings Nearby (map V's)
  - *Millions* of Warehouse SqFt. Awaiting Tenants
  - Thousands of Vacant Acres Available (map red)
- **Removes Prime Farmland.**
- **Violates LAFCo Std I.6**

## LAFCo Sphere of Influence Policy Standard I.6

Amendment proposals involving Sphere expansion which contain prime farmland **will not be approved by LAFCo if there is sufficient alternative land available for annexation within the existing Sphere of Influence.**

Metro Air Park: Vacant MFG Buildings & Parcels in USB



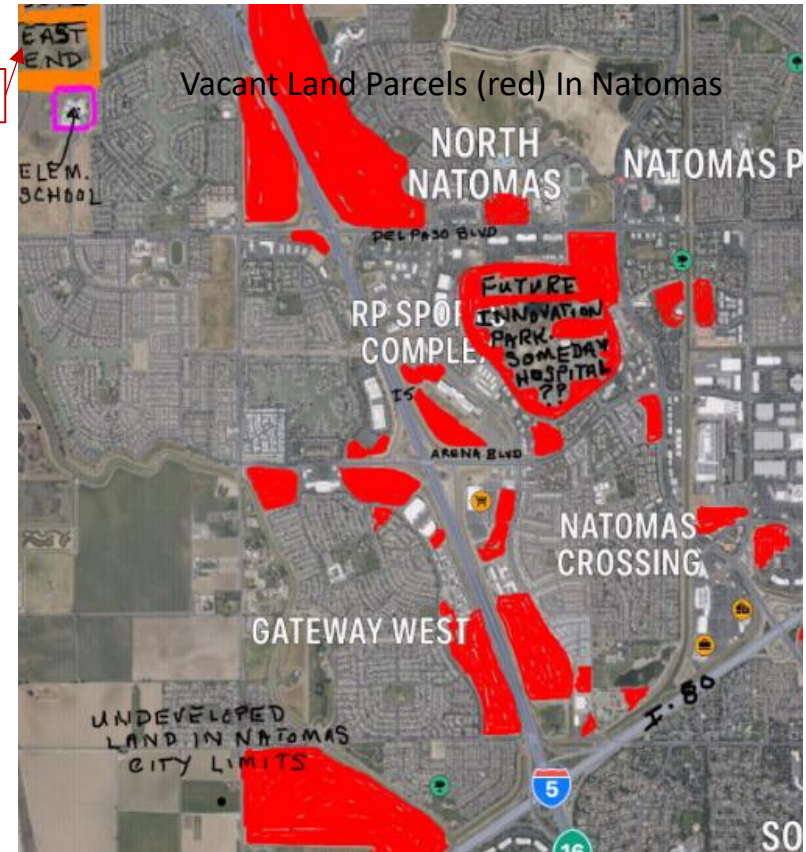
***No Compelling Need/Tenant To Add More Warehouse Land***



## Compelling Need for “Leapfrog” Development? NO.

- **Thousands of Vacant Acres in Natomas USB (map, red)**
  - Warehouse Parcels Along I-5, I-80, Gateway Park Dr.
- **Natomas Has Great Need For Business Development!**
  - Still Awaiting Hospital, Employment Centers, Commercial
- **Developer Bought Land Knowing It Was Outside USB**
  - No Compelling Tenant or Need to Annex
- *If City Of Sacramento Needs Revenue, Promote Business Development In Current Natomas USB!*

ASI Site



***ASI “Leapfrog” Undermines Business Development in Natomas***

# Annexation Benefits Local Residents? NO.

- Project EIR Has Numerous Significant Impacts.
  - Green House Gas Emissions (GHGe) **10 Times HIGHER Than Thresholds** AFTER 35% Reduction
  - **9.53 Cancer Risk Rounds to 10;** a “Significant” Risk
  - Vehicle Miles Traveled (VMT) **Exceeds 128%** of Regional Avg. After 22% Reduction Monitoring Plan
  - Seven Significant, Unavoidable Impacts

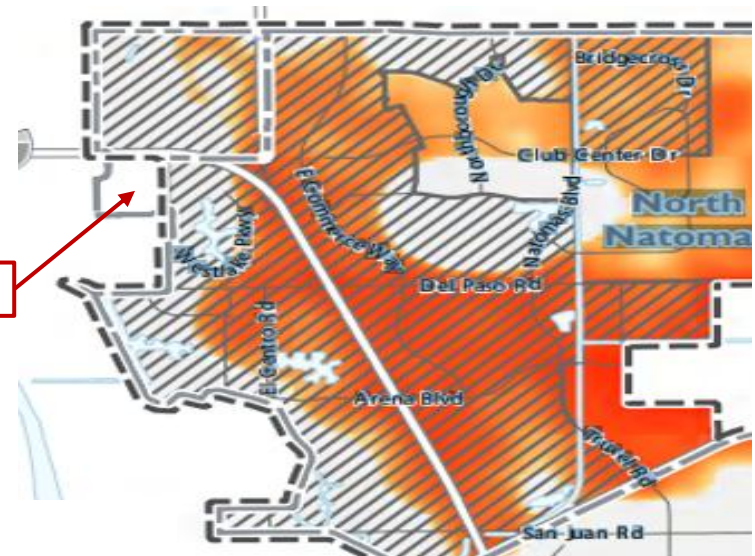
## LAFCo ASI Project Resolution 2025-09, para 12:

**WHEREAS**, the Final EIR included a Statement of Overriding Considerations, per CEQA Guidelines, Section 15093(b), because the proposed project would result in significant and unavoidable impacts related to substantially degrading the existing visual character or the quality of public views (Impact 4.1-3); cause long-term changes in the visual character associated with cumulative development of the proposed project in combination with future buildout of the City of Sacramento 2040 General Plan and Sacramento County General Plan (Impact 4.1-5); convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use (Impact 4.2-1); cause impacts related to compliance with the Cortese-Knox-Hertzberg act (Impact 4.2-4); cause cumulative loss of agricultural land (Impact 4.2-5); conflict with or obstruct implementation of the applicable air quality plan (Impact 4.3-2); and result in a cumulatively considerable net increase in criteria pollutants for which the region is in non-attainment (Impact 4.3-6).

## Would You Want Your Child to Attend School Next Door?

- Farmland Has “Health Value” At I-5/HWY 99 Location
  - “Sandwiches” Residents Between High GHGe Sources
    - Gen Plan Predicts High Heat, Noise (map, red)
- Large, 474-Acre Farmland Provides Vital Relief
  - GHGe & Heat Absorption. Low Noise
  - Groundwater Recharge & Drainage
  - Habitat For Declining Wildlife

Sac City 2040 General Plan Map ERC-4:  
Urban Heat Priority Intervention Areas



## Why Eliminate A Huge Climate Asset to Bring Health Threats?

Clear Answer per City's Climate Policies:  
**Vote "NO"**  
on Annexation & the ASI Project

- **Violates Sphere of Influence Policies (e.g. LAFCO Std I.6)**
- **SETS BAD PRECEDENT: Will Compete With Available M-1 Sites In USB**
  - **Incentivizes SPRAWL**
- **Threatens Quality of Life for Nearby Neighborhoods**
  - **Adds Significant Traffic & GHGe to Natomas**
- **Significant Unavoidable Health Impacts to School Kids & Residents**
  - **No "Compelling Need" or Tenant**



**ECOS**  
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OF SACRAMENTO

Post Office Box 1526 | Sacramento, CA 95812-1526

June 25, 2025

Sacramento City Planning and Design Commission  
Enoch Yeung (Chair)  
Robert Chase (Vice Chair)  
Robert Blunt  
Nicolina Hernandez  
Dov Kadin  
Julio Lamas  
Larry Lee  
Kendra Macias Reed  
David Nybo  
Deborah Ortiz  
Erin Reschke  
Ginger Thompson

Sent by email to: [clerk@cityofsacramento.org](mailto:clerk@cityofsacramento.org) , [rblunt.sac@gmail.com](mailto:rblunt.sac@gmail.com),  
[rkutect@gmail.com](mailto:rkutect@gmail.com), [pdc.nicolina@gmail.com](mailto:pdc.nicolina@gmail.com), [DovKadinPDC@gmail.com](mailto:DovKadinPDC@gmail.com), [lamas.pdc@gmail.com](mailto:lamas.pdc@gmail.com),  
[pdc.larrylee@gmail.com](mailto:pdc.larrylee@gmail.com), [kreed.pdc@gmail.com](mailto:kreed.pdc@gmail.com), [nybosacpdc@gmail.com](mailto:nybosacpdc@gmail.com),  
[Commissiondeb@gmail.com](mailto:Commissiondeb@gmail.com), [erinreschke.pdc@gmail.com](mailto:erinreschke.pdc@gmail.com), [ginjerthompson.pdc@gmail.com](mailto:ginjerthompson.pdc@gmail.com),  
[pdc.eyeueng@gmail.com](mailto:pdc.eyeueng@gmail.com)

**SUBJECT: AGENDA ITEM 2, June 26, 2025, Airport South Industrial Annexation (P21-017) [Published 05/02/2025] File ID: 2025-01031**

Dear Chair Yeung and Planning Commissioners,

We look forward to the opportunity to speak to you on June 26, as a continuation of the meeting from May 22, 2025 where the proposed Airport South Industrial Annexation was considered.

As you prepare for this meeting, we are again sharing with you materials relevant to the proposed Airport South Industrial project. We ask that you consider them and ask that you oppose the project.

We have created links to several documents and attached two maps

1. The Natomas Basin Conservancy would be effectively destroyed by the proposed projects.  
[Read the NBC letter.](#)

2. ECOS has expressed a wide range of concerns about impacts to existing agreements such as the Urban Services Boundary, the NBHCP, the NBC, roads, traffic and more. [Read the ECOS letter to the Commission of May 21, 2025.](#)
3. N Magazine, a Natomas on-line magazine, recently published an article about development in Natomas. [Read the article.](#)
4. I recently created a video expressing my thoughts and concerns about the Airport South Project. [See it here.](#)

Attachments:

- Map 1: Developments and USB – Shows the major projects proposed outside the USB as well as the USB, mitigation land, and the Swainsons' Hawk Zone. Acreage of the proposed projects:
  - GrandPark Southwest – 1,871 acres
  - GrandPark Brookfield – 3,485 acres
  - Airport South Industrial – 447 acres
  - Upper Westside – 2,066 acres
- Map 2: Airport South Neighbors – Zooms in to show the land use closest to the proposed project.

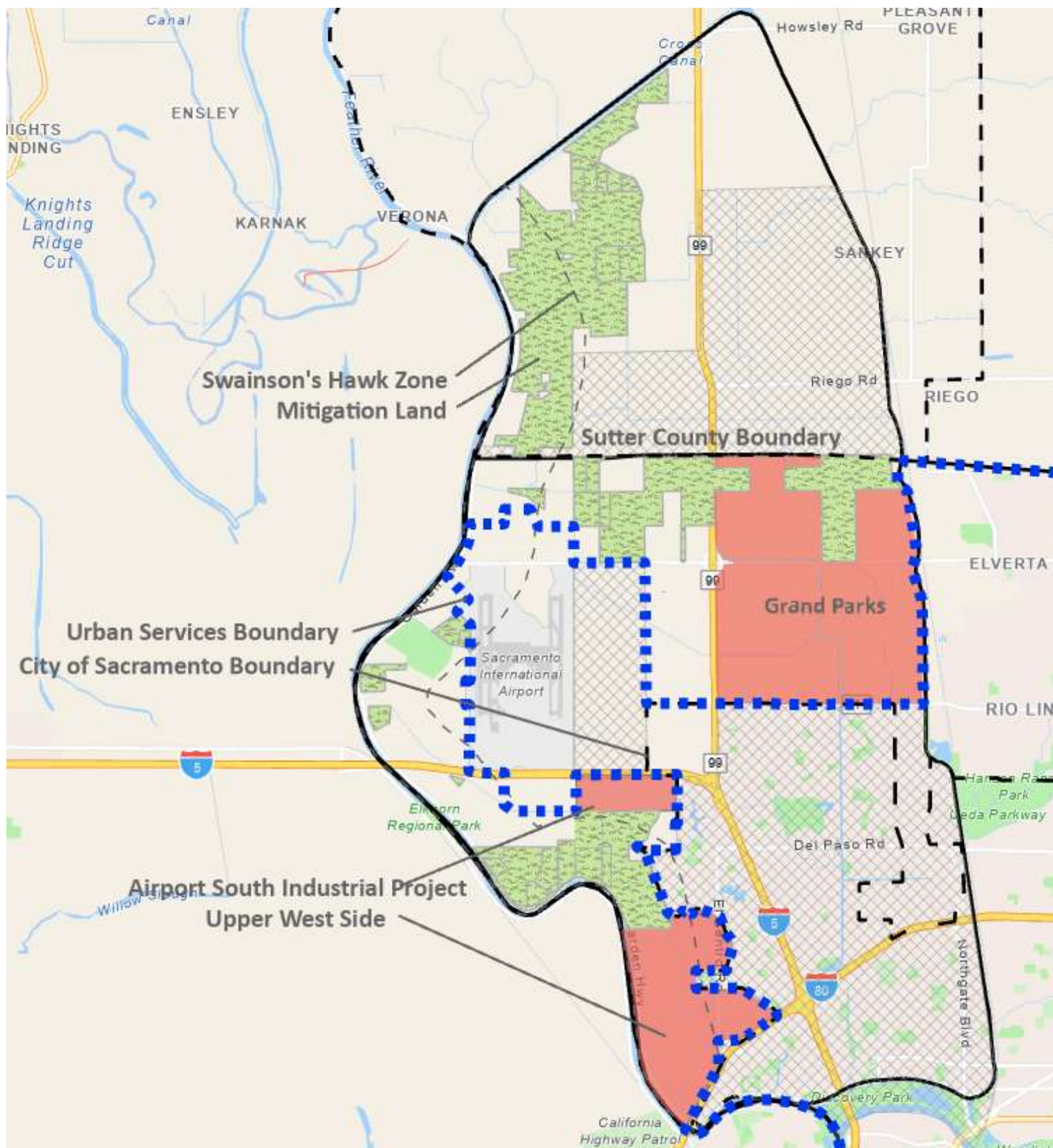
Thank you for your consideration.

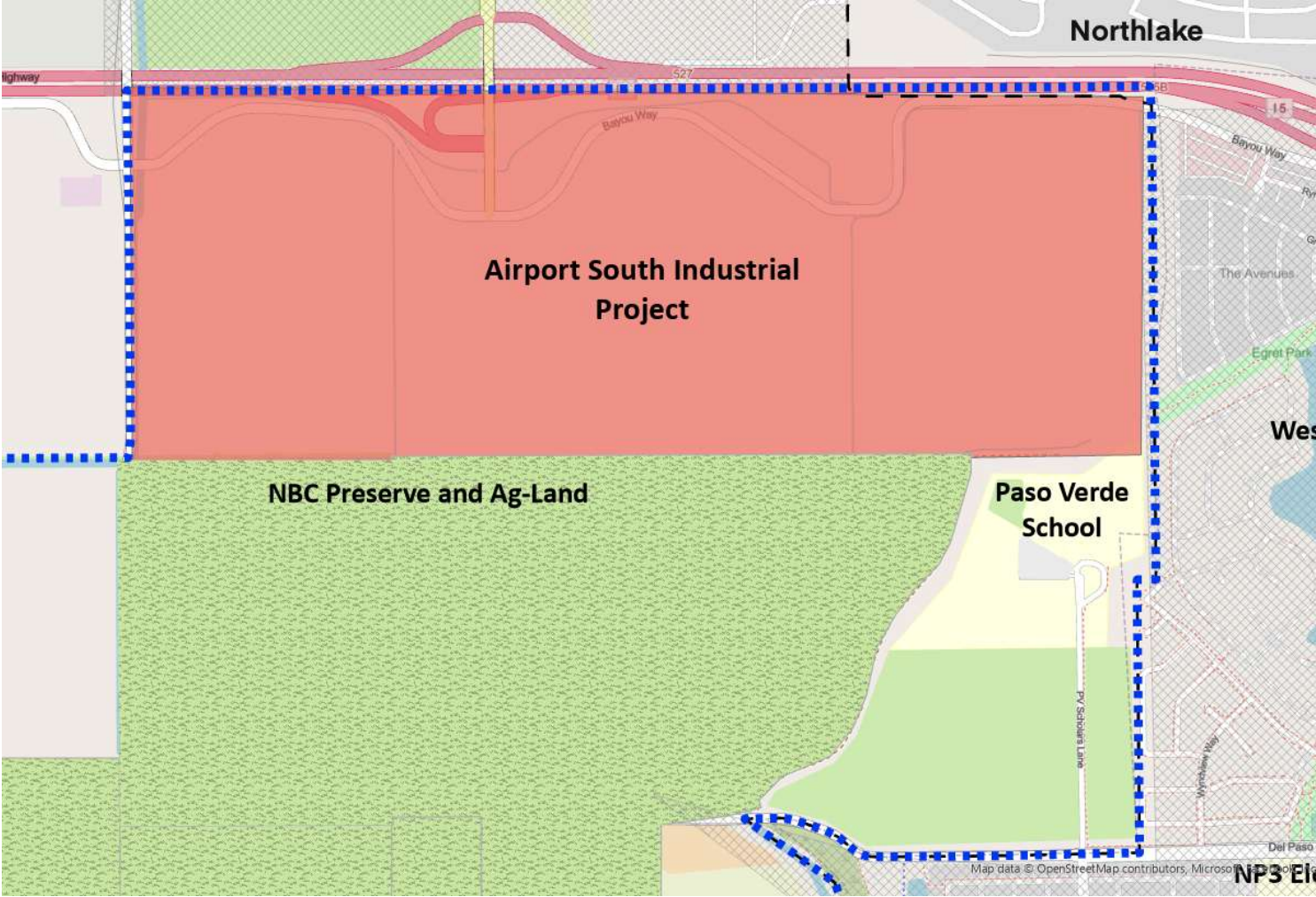
Sincerely,

A handwritten signature in blue ink that reads "Heather Fargo". The signature is written in a cursive, flowing style.

Heather Fargo  
President of the Board of Directors









## Sacramento City Planning and Design Commission

RE: Airport South Industrial Annexation Project (P21-017)

On behalf of the Cayocca & Scalora families who are owners of property- (Parcel 8)- which is within the proposed area - we strongly endorse the City staff's recommendations and request that you adopt and follow them.

Our property was purchased and has been owned by us since 1960 and was farmed for over 50 years and then came homes on our east and a school to our south.

It became virtually impossible to continue farming and so our land sits idle except for trespassers, homeless and illegal trash dumping.

We have been losing the ability to utilize our land for farming as a result of the changes that have occurred in the area.

Over the past 50 years, we have seen the farmland near us be developed with residential development and a school when that area was once viable productive agriculture.

We are losing our land little by little by surrounding it with other uses and then then being told we cannot develop our land because of those other uses.



As for the North Point request before you, we need to differentiate Participating vs Non-Participating parcels –

**Non-Participating** - that just means that our parcel has not been committed as a financial project applicant participant to the North Point Development Project -

although the environmental evaluation and recommended mitigation for the potential future development of the annexation area includes calculations that attribute certain amounts of traffic, pollution and other items to us - **for calculation purposes only.**

The issues raised, concerning **our** property are threefold – Habitat, Traffic and Pollution.

For clarity's sake - **for our property**, please consider the following:

As for habitat concerns our property is already covered by the Natomas HCP and there is no evidence that shows it will be disregarded or violated. And to suggest otherwise is disingenuous.

Any future development of our property will comply with the Natomas HCP which greatly benefits and supports the ultimate completion of the HCP conservation plan.

As for the suggested traffic/pollution problems although included in the proposed development plan, **we have not proposed any roadways or anything that creates or emits pollution on or from our property.**

Further, there is only one road proposed by North Point near our property and that is at the north edge of our acreage (approximately 1/4-1/2 mile to the school) about the same distance as Del Paso Road is to the school) and there are no roads proposed on the east (Westlake) side or south (School) side of our property.

Regarding barriers/berms - there is already a barrier on the eastside of our property between us and the West Lake development that is approximately 200' wide.

In addition, we have been cooperating with the City staff and have been agreeable to provide an additional buffer on our property that results in greater open space buffer separator.

We agree with the recommendations and findings and urge you to follow them and allow us to utilize our property in an appropriate manner.

We should be given the same fair opportunity for future development of our property as was granted by the City to the development that became our residential and school neighbors.

Given our history with this land and the diminution in means to utilize it, we believe it only fair and reasonable to allow us to go forward and follow the City's recommendations.

Anthony Scalora



June 24, 2025

Planning & Design Commission  
City of Sacramento  
915 I Street  
Sacramento, CA 95814

**RE: Letter of Support - Airport South Industrial (ASI) Project**

Dear Commissioners,

On behalf of the Sacramento Metro Chamber of Commerce and our member businesses throughout the City of Sacramento, we strongly support the proposed Airport South Industrial (ASI) Project located near the Metro Air Parkway interchange, south of Sacramento International Airport.

The ASI Project represents a transformational opportunity for the Sacramento region—one that directly supports the Metro Chamber's mission to drive economic growth, attract private investment, and expand job opportunities across the capital region. With over 4.4 million square feet of Class A light industrial space and 100,000 square feet of commercial development, this phased project will serve as a hub for logistics, bioscience, research and development, and clean manufacturing.

The anticipated benefits are substantial:

- Over \$700 million in annual economic impact once fully operational
- More than 5,200 new jobs and \$303 million in annual employee compensation
- An estimated \$541 million in construction revenue, including wages and benefits for over 3,400 construction jobs
- Critical infrastructure upgrades and traffic safety improvements that will enhance regional connectivity
- Thoughtful open space buffers that support stormwater management and natural habitat preservation



The Sacramento region faces a historically low industrial vacancy rate, currently around 5%. The ASI Project will help meet urgent demand for industrial space while supporting smart growth near existing transportation infrastructure.

We are especially encouraged by NorthPoint Development's commitment to responsible development, strong community partnerships, and long-term stewardship. This project embodies the type of forward-looking investment that positions Sacramento for sustained prosperity, resilience, and economic leadership.

The Metro Chamber strongly urges your support for the Airport South Industrial Project, and we commend the development team for their thoughtful and impactful proposal. Thank you for your consideration.

Sincerely,

A handwritten signature in black ink that reads "Robert W. Heidt, Jr." The signature is written in a cursive, slightly slanted style.

Robert W. Heidt, Jr.

President & CEO

Sacramento Metropolitan Chamber of Commerce

**BLUM, COLLINS & HO LLP**

ATTORNEYS AT LAW  
10250 CONSTELLATION BOULEVARD  
SUITE 2300  
LOS ANGELES, CALIFORNIA 90067  
(213) 572-0400

May 27, 2025

Scott Johnson  
Senior Planner  
City of Sacramento Community Development Department  
300 Richards Boulevard, Third Floor  
Sacramento, CA 95811

*Via Email to:*  
[SRJohnson@cityofsacramento.org](mailto:SRJohnson@cityofsacramento.org)

***Subject: Comments on Airport South Industrial Project Final EIR (SCH NO. 2022030181)***

Dear Mr. Johnson,

Thank you for the opportunity to comment on the Final Environmental Impact Report (FEIR) for the proposed Airport South Industrial Project. Please accept and consider these comments on behalf of Golden State Environmental Justice Alliance. Also, Golden State Environmental Justice Alliance formally requests to be added to the public interest list regarding any subsequent environmental documents, public notices, public hearings, and notices of determination for this project. Send all communications to Golden State Environmental Justice Alliance P.O. Box 79222 Corona, CA 92877.

**1.0 Summary**

The proposed project would include the development of an industrial park within an approximately 353.5-acre portion of the project site, located immediately south of Bayou Way. The industrial park would allow for construction of up to 5,204,500 square feet (sf) of industrial uses on approximately 235.6 acres, as well as approximately 98,200 sf of retail/highway commercial uses, including approximately 73,400 sf of hotel/hospitality, on approximately 13.4 acres. Throughout the EIR, the term “industrial park” is used as an umbrella term for the proposed industrial and retail/highway commercial uses. Thus, unless a distinction between the proposed industrial and retail/highway commercial uses is specifically defined, the term “industrial park” can be assumed to incorporate both of the foregoing uses.

Parcels 6A through 6C and 7A through 7C are proposed retail/highway commercial uses generally situated south of the intersection of I-5 and Metro Air Parkway. Parcels 1 through 4, all planned for industrial use, generally surround the proposed retail/highway commercial uses. Parcel 5, the remaining proposed industrial use, would be located in the northeast corner of the site. The project

site also includes several nonparticipating parcels, comprised of approximately 83 acres, and would result in first tier entitlements for future industrial uses of approximately 1,404,800 sf.

### Industrial Uses

The total estimated square footage of industrial buildings would be 5,204,500 sf within five parcels totaling 235.6 acres. The area of each of the aforementioned parcels and associated warehouse buildings would be as follows:

Parcel 1: 47.7 acres, 979,400-sf building;

Parcel 2: 53.4 acres, 1,335,200-sf building;

Parcel 3: 34.4 acres, 772,900-sf building;

Parcel 4: 54.7 acres, 1,335,200-sf building; and

Parcel 5: 45.4 acres, 781,800-sf building.

### Commercial Uses

The commercial component of the proposed project would include six lots comprised of approximately 98,200 sf of retail/highway commercial uses, including approximately 73,400 sf of hotel/hospitality, on approximately 13.4 acres. All six retail/highway commercial lots would be clustered south of the intersection of I-5 and Metro Air Parkway, near the center of the project site. The area of each of the aforementioned parcels and associated commercial buildings would be as follows:

Parcel 6A: 2.1 acres, 3,900-sf restaurant building;

Parcel 6B: 1.5 acres, 3,900-sf restaurant building;

Parcel 6C: 3.0 acres, 8,100-sf fueling station/carwash;

Parcel 7A: 4.0 acres, 73,400-sf hotel building;

Parcel 7B: 1.5 acres, 3,900-sf restaurant building; and

Parcel 7C: 1.3 acres, 5,000-sf restaurant building.

### Nonparticipating Parcels

The proposed project includes several nonparticipating parcels comprised of approximately 83 acres, which would receive first-tier entitlements, such as the proposed SOI Amendment to amend the City of Sacramento SOI and Annexation of the site into the City limits and SacSewer service area, for future industrial uses of approximately 1,404,800 sf. These future development areas include six existing parcels controlled by separate owners, which are summarized as follows:

Parcel 8: 64.3 acres (Cayocca);

Parcel 9: 6.5 acres (Campbell);

Parcel 10: 4.6 acres (Isgur Trust); and

Parcel 11: 0.7-acre (Patel).

Discretionary actions required to approve the proposed project include:



1. LAFCo approval of a Sphere of Influence (SOI) Amendment to amend the City of Sacramento SOI.
2. LAFCo approval of Annexation of the project site into the City limits and SacSewer service area.
3. City of Sacramento approval of a General Plan Amendment of the City of Sacramento 2040 General Plan to include the boundaries of the industrial park footprint and nonparticipating parcels (total of 414.3 acres – not including roadways) as Employment Mixed-Use.
4. City of Sacramento approval of a Rezoning of 317.9 acres (not including roadways) to M-1-PUD and 13.4 acres (not including roadways) to HC-PUD for the industrial park portion of the site, and 83 acres to M-1 for the nonparticipating parcels.
5. City of Sacramento approval of a PUD (Schematic Plan and PUD Guidelines).
6. City of Sacramento approval of a Tentative Master Parcel Map.
7. City of Sacramento approval of a Development Agreement.
8. City of Sacramento approval of a Finance Plan.
9. County of Sacramento approval of a Property Tax Exchange Agreement.

The FEIR/Response to Comments has not adequately, accurately, or fully addressed each of the comments in Comment Letter 16. Therefore, Comment Letter 16 is reincorporated in its entirety and included as an attachment here.

### **Response to Comment 16-3**

The FEIR acknowledges that, “an EIR is required to demonstrate how a project would comply with all applicable regulations related to avoiding potentially significant environmental impacts, and is required to provide all documentation necessary to do so. Where specific information is not yet available, such as parking locations, the worst-case conditions are assumed so as to provide a conservative analysis.” The DEIR Executive Summary states that the document provides a project-specific analysis pursuant to CEQA Guidelines Section 15161. Therefore, all project-specific Planning Application items must be provided in their whole and complete form in order to provide an adequate and accurate environmental analysis. The FEIR states that the project, “will be evaluated for compliance with all applicable standards,” which indicates that it has not currently been evaluated for compliance with all applicable standards as required by a Project EIR.

The FEIR also states that, “It should be noted that parking and loading dock areas can be identified and inferred based on the Site Plan,” which is misleading to the public and decision makers. Identification and inference are not the same. “Identification” insinuates that something is clearly marked or delineated. “Inference” indicates that something is not clearly defined and the observer can draw their own conclusions, which are not guaranteed to be accurate.

Additionally, the parking/loading dock areas are not identified on the Site Plan and it is not appropriate to encourage the public/decision makers to “infer” their location and layout. The FEIR attempts to mislead the public/decision makers in this statement, which does not equate to disclosing their true locations as required by CEQA’s basic tenets of public disclosure and accurate informational documents. The DEIR is required to provide a project-specific analysis as required by CEQA Guidelines Section 15161. A revised EIR must be prepared to include wholly accurate and unedited detailed floor plan, grading plan, site plan, building elevations, and project narrative for public review.

#### **Response to Comment 16-4**

The FEIR relies upon the approval of the PUD Guidelines to justify exclusion of the architectural building elevations because. The DEIR is required to provide a project-specific analysis as required by CEQA Guidelines Section 15161. The DEIR does not provide specifics of the PUD Guidelines and an analysis of their compliance with or deviations from the City standard requirements are required. The public/decision makers are unaware of the guidelines/development standards proposed in the PUD Guidelines, which does not comply with CEQA’s basic tenets of public disclosure and accurate informational documents. The public/decision makers cannot review the architectural building elevations for basic information like total building height, much less review this in accordance with the standard City requirements for height and the proposed PUD Guidelines for height. A revised EIR must be prepared to include wholly accurate and unedited detailed floor plan, grading plan, site plan, building elevations, and project narrative for public review.

#### **Response to Comment 16-5**

The FEIR states that, "The analysis of the Draft EIR is based on the information provided by the project applicant that approximately 304,000 cubic yards of soil would be imported during grading." Again, there is no method for the public/decision makers to review this statement of information provided by the applicant. There is no information regarding the methodology or source that resulted in the calculation that the project will require 304,000 cubic yards of soil import. There is no method for the public/decision makers to verify this statement. The FEIR/DEIR has not provided any substantial evidence to support this claim. This also does not comply with CEQA’s requirements for public disclosure and adequate informational documents. The DEIR is required to provide a project-specific analysis as required by CEQA Guidelines Section 15161. A revised EIR must be prepared to include wholly accurate and unedited detailed floor plan, grading plan, site plan, building elevations, and project narrative for public review.

#### **Response to Comment 16-6**

The FEIR cites three examples of case law related to the ability of an EIR to exclude a Development Agreement from public review as justification for excluding the PUD Schematic



Plan, PUD Guidelines, Tentative Master Parcel Map, Development Agreement, Finance Plan, and Property Tax Exchange Agreement from public review for the proposed project. The FEIR excludes that the court's decisions in these cases were based on the plaintiff not adequately demonstrating that their exclusion, "precludes meaningful decision making or public comment" (East Sacramento Partnership for a Livable City v. City of Sacramento 2016). The proposed project's PUD Schematic Plan, PUD Guidelines, and Tentative Master Parcel Map are all necessary for meaningful decision making and public comment, as stated throughout this letter, our previous letter (Comment Letter 16 in the FEIR), and all attachments. Additionally, since the project requires a SOI Amendment, expands the urban growth boundaries of the City beyond all local or regional plans, and significantly contributes to unplanned economic and population growth, it is vital for the public to review the proposed Development Agreement, Finance Plan, and Property Tax Exchange Agreement to ascertain the project's potentially significant impacts. A revised EIR must be prepared to include the complete PUD Schematic Plan, PUD Guidelines, Tentative Master Parcel Map, Development Agreement, Finance Plan, and Property Tax Exchange Agreement as attachments for review, analysis, and comment by the public and decision makers in order to comply with CEQA's requirements for adequate informational documents and meaningful disclosure (CEQA § 15121 and PRC 21003(b)).

#### **Response to Comment 16-7**

The FEIR states that, "Contrary to the commenter's claim that the proposed project does not comply with PUC Section 21676(b), SACOG prepared an ALUC Preliminary Review and provided conditions of approval for the project's compatibility with the Sacramento International Airport's ALUCP. As such, the proposed project has been provisionally approved for compatibility with the ALUCP by the SACOG ALUC. If the design of the proposed project is not consistent with the conditions of approval decided upon by the SACOG ALUC, the project would be denied, and development would not occur." However, the SACOG ALUC Preliminary Review and conditions of approval are not included for public review, which does not comply with CEQA's requirements for adequate informational documents and meaningful disclosure (CEQA § 15121 and PRC 21003(b)). Incorporation by reference (CEQA § 15150 (f)) is not appropriate as the SACOG ALUC Preliminary Review and conditions of approval contribute directly to analysis of the problem at hand. A revised EIR must be prepared to include the SACOG ALUC Preliminary Review and conditions of approval for review, analysis, and comment by the public and decision makers in order to comply with CEQA's requirements for adequate informational documents and meaningful disclosure (CEQA § 15121 and PRC 21003(b)).

As stated in Comment Letter 16, the proposed project requires a General Plan Amendment to change the land use designation on the project site. Prior to the amendment of a General Plan, the ALUC shall review the plan, ordinance, or regulation for consistency with the ALUCP (PUC

Section 21676(b))<sup>1</sup>. The FEIR utilizes SACOG's alleged review as justification for compliance with (PUC Section 21676(b))<sup>2</sup>. The FEIR/DEIR has not provided any substantial evidence to support the claim that the project complies with PUC Section 21676(b), the ALUCP, and or a less than significant finding. Commenters reserve the right to continue this comment and analysis on this topic should the alleged SACOG ALUC Preliminary Review and conditions of approval be included in a revised EIR.

### **Response to Comment 16-8**

The FEIR/DEIR does not consider the specific intent and purpose of the Employment Mixed-Use land use designation, which is “to buffer residential uses from more intense industrial and service commercial activities and to provide compatible employment uses near higher-density and mixed-use housing.” The intent of the Industrial Mixed-Use land use designation is to accommodate industrial uses that “have a high volume of truck traffic.” Table 4.12-1 Project Trip Generation – Industrial Planned Unit Development Uses within the Draft EIR concludes that the project will generate 2,559 daily heavy duty truck trips. A heavy duty truck trip analysis was not conducted for the Highway Commercial uses, so the project will actually generate more than 2,559 daily heavy duty truck trips. The project's high volume of truck traffic and incompatibility with residential uses (significant and unavoidable cumulatively considerable impacts to Aesthetics, Agricultural Resources, Air Quality, and Greenhouse Gas Emissions) renders it incompatible with the proposed Employment Mixed-Use land use designation. The project is consistent with the Industrial Mixed Use designation. However, the General Plan states that the Industrial Mixed Use designation, “should not be located next to a residential neighborhood without substantial buffers (i.e., office uses, regional parks, greenways, or open space),” meaning that it should not be applied to the project site even though it is the appropriate land use designation for the proposed project. The EIR must be revised to include this information for analysis and include a finding of significance as the proposed project is not consistent with the Employment Mixed-Use designation.

Further, as shown below, the General Plan provides examples of the type of development generated by the Employment Mixed-Use and Industrial Mixed Use designations. The proposed project is clearly reflective of the Industrial Mixed Use land use designation.

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<sup>1</sup> California Airport Planning Land Use Handbook Section 1.3.4. ALUC Review <https://dot.ca.gov/-/media/dot-media/programs/aeronautics/documents/californiaairportlanduseplanninghandbook-a11y.pdf>

<sup>2</sup> California Airport Planning Land Use Handbook Section 1.3.4. ALUC Review <https://dot.ca.gov/-/media/dot-media/programs/aeronautics/documents/californiaairportlanduseplanninghandbook-a11y.pdf>

Pell-Main Industrial Park, Cannon Industrial Park, and portions of the Sacramento Railyards, River District, and the Power Inn Business Improvement District.

Allowable uses include the following:

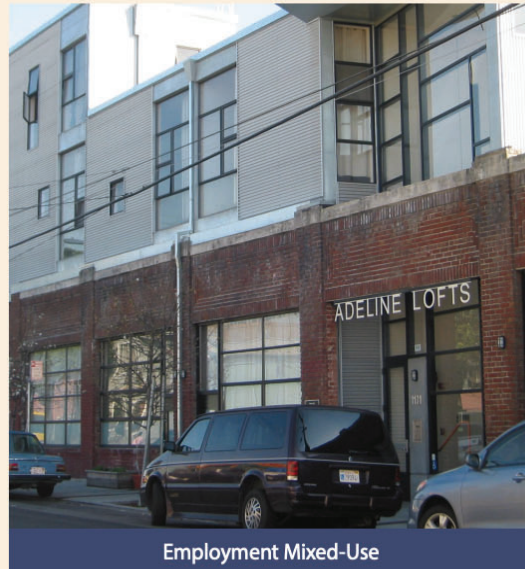
- Light/advanced manufacturing, production, distribution, repair, testing, printing, research, and development
- Service commercial uses that do not generate substantial noise or odors
- Accessory office uses
- Retail and service uses that provide support to employees
- Compatible residential uses such as live-work spaces or employee housing
- Hotels and motels
- Care facilities
- Assembly facilities
- Compatible public and quasi-public uses

 The **Industrial Mixed-Use (IMU)** designation provides for manufacturing, warehousing, and other employment-generating uses that may produce loud noise or odors and tend to have a high volume of truck traffic. Building intensities in this designation tend to be lower, and uses may require staging and support spaces, often outdoors. The IMU designation applies in the Power Inn/Army Depot area.

Allowable uses include the following:

- Industrial or manufacturing that may occur within or outside a building
- Office, retail, and service uses that provide support to the employees
- Assembly facilities
- Care facilities
- Compatible public and quasi-public uses

This designation should not be located next to a residential neighborhood without substantial buffers (i.e., office uses, regional parks, greenways, or open space). Supportive office, retail, and service uses that cater to employee needs are allowed. Compatible public, quasi-public, and special uses are also permitted.



**Response to Comment 16-8 and 16-9**

The FEIR asserts that, “any residential uses associated with the Agricultural Cropland land use designation are presumed to be associated with such agricultural activities. As such, while residential uses are allowable under the Agricultural Cropland land use designation, the designation is not considered to be residential.” The Housing Crisis Act (HCA) of 2019/Senate Bill (SB) 330<sup>3</sup>/SB 8<sup>4</sup> do not provide any qualifications on Zoning designations that permit residential development or specify that residential uses must be the primary use in order for the regulations to apply. The HCA/SB 330/SB 8 is broadly scoped to require replacement housing sites when any land that permits housing development experiences land use changes to ensure no net loss of housing capacity. The DEIR states that, “based on the existing Sacramento County General Plan land use and zoning designations for the project site, residential development was not anticipated at the project site.” However, this statement is erroneous and misleading to the public and decision makers and must be replaced with factual information as part of a revised EIR. The project site has an existing Sacramento County Land Use Element designation of Agricultural Cropland<sup>5</sup>, which “allows single family dwelling units at a density no greater than 40 acres per unit.” Therefore, the 474.4 acre project site has an existing residential development capacity of 11 dwelling units and the HCA/SB 330/SB 8 apply to the project site.

Government Code Section 66300(b)(1)(A) requires that agencies shall not “change the general plan land use designation, specific plan land use designation, or zoning to a less intensive use below what was allowed under the land use designation and zoning ordinances in effect at the time of the proposed change.” Under Government Code Section 66300(b)(1)(A), a “less intensive use” includes, but is not limited to, reductions to height, density, or floor area ratio, new or increased open space or lot size requirements, or new or increased setback requirements, minimum frontage requirements, or maximum lot coverage limitations, or any other action that would individually or cumulatively reduce residential development capacity. Pursuant to SB 330, replacement capacity for any displaced residential units must be provided **concurrently** at the **time of project approval.**

Government Code Section 66300 (h)(i)(1) states that, “this section does not prohibit an affected county or an affected city, including the local electorate acting through the initiative process, from changing a land use designation or zoning ordinance to a less intensive use, or reducing the intensity of land use, if the city or county concurrently changes the development standards, policies, and conditions applicable to other parcels within the jurisdiction to ensure that there is no net loss in residential capacity.” As calculated above, the project site’s Sacramento County Land

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<sup>3</sup> Housing Crisis Act of 2019/SB 330

[https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill\\_id=201920200SB330](https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=201920200SB330)

<sup>4</sup> SB 8 [https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill\\_id=202120220SB8](https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=202120220SB8)

<sup>5</sup> <https://planning.sacounty.gov/Documents/B12.%20Land%20Use%20Element%20Amended%2012-13-22.pdf>



Use Element designation of Agricultural Cropland provides development capacity for 11 residential units. Adoption of the proposed SOI Amendment, General Plan Amendment, and Rezoning as part of the proposed project will result in a reduction of the existing residential development capacity by 11 units to a decreased development capacity of 0 residential units.

This is in conflict with SB 8 that expanded the provisions of the HCA to include Government Code Section 66300 (h)(i)(1) requiring concurrent approval of replacement sites to ensure no net loss in residential capacity, and Section 66300 (h)(2)(A) defining “concurrently” to mean the action is approved at the same meeting of the legislative body. The EIR has not identified replacement sites for the net loss in residential capacity for 11 units as a result of project implementation. The loss in residential capacity must be included as a finding of significance as part of a revised EIR. The EIR does not act in conformance with the HCA/SB 330/SB 8 and the lost zoning capacity of any dwelling units is a significant environmental impact in violation of the HCA/SB 330/SB 8. The EIR must be revised to include a finding of significance due to this inconsistency.

Additionally, deferring the environmental analysis of construction and operation of replacement sites to a later date is project piecemealing in violation of CEQA. The EIR does not accurately or adequately describe the project, meaning “the whole of an action, which has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment” (CEQA § 15378). The whole of the action must statutorily and legally include the identification of replacement sites and all associated actions required to implement development of at least 11 residential units.

### **Response to Comment 16-10**

The FEIR has revised Table 4.9-6 Discussion of Relevant Sacramento LAFCo Policies to edit its analysis of “LAFCo Policy I(6): Amendment proposals involving Sphere expansion which contain prime agricultural land will not be approved by the LAFCo if there is sufficient alternative land available for annexation within the existing Sphere of Influence,” to simply insert into the pre-existing text that there is no site available within the City’s SOI. The FEIR/DEIR has not provided any substantial evidence to support the claim that there is no sufficient alternative land available for annexation within the existing Sphere of Influence. Editing the prior text to change the term from “City” to “City SOI” does not meaningfully or substantially support a completely different type of analysis from the incorporated City to specifically the existing SOI. The prior analysis was not about the City SOI, and therefore simply changing the subject from “City” to “City SOI” does not provide an accurate analysis. The FEIR/DEIR has not provided any meaningful or substantial evidence to support a less than significant finding and a finding of significance must be provided in a revised EIR.

**Response to Comment 16-11**

The FEIR refers to the Response to Comment 16-6. Here, the FEIR cites three examples of case law related to the ability of an EIR to exclude a Development Agreement from public review as justification for excluding the PUD Schematic Plan, PUD Guidelines, Tentative Master Parcel Map, Development Agreement, Finance Plan, and Property Tax Exchange Agreement from public review for the proposed project. The FEIR excludes that the court's decisions in these cases were based on the plaintiff not adequately demonstrating that their exclusion, "precludes meaningful decision making or public comment" (East Sacramento Partnership for a Livable City v. City of Sacramento 2016). The proposed project's PUD Schematic Plan, PUD Guidelines, and Tentative Master Parcel Map are all necessary for meaningful decision making and public comment, as stated throughout this letter, our previous letter (Comment Letter 16 in the FEIR), and all attachments. Additionally, since the project requires a SOI Amendment, expands the urban growth boundaries of the City beyond all local or regional plans, and significantly contributes to unplanned economic and population growth, it is vital for the public to review the proposed Development Agreement, Finance Plan, and Property Tax Exchange Agreement to ascertain the project's potentially significant impacts. A revised EIR must be prepared to include the complete PUD Schematic Plan, PUD Guidelines, Tentative Master Parcel Map, Development Agreement, Finance Plan, and Property Tax Exchange Agreement as attachments for review, analysis, and comment by the public and decision makers in order to comply with CEQA's requirements for adequate informational documents and meaningful disclosure (CEQA § 15121 and PRC 21003(b)).

**Response to Comment 16-12**

The FEIR states that, "the entire proposed fueling station/carwash would be comprised of 8,100 sf, with the associated convenience store being only a *portion* of that square footage." Again, the FEIR circumvents a complete analysis with applicable City requirements, which in this case is Sacramento Municipal Code Section 17.224.410 (HC zone—Permitted uses) that limits retail stores to 5,000 square feet in size. The FEIR/DEIR refuses to state the total square footage of the proposed retail store. This does not comply with CEQA's basic tenets of public disclosure and adequate informational documents. The FEIR/DEIR has not provided any substantial evidence to support a less than significant finding. Notably, Figure 3-3 Airport South Industrial Park – Preliminary Site Plan states that the fueling station/carwash (and retail store) will have a building area of 6,690 square feet. The EIR must be revised to include a finding of significance as the proposed project does not comply with the Sacramento Municipal Code.

**Response to Comment 16-13**

The FEIR does not adequately address the comment. CEQA Guidelines Section 15126.2(e) states regarding analysis of Growth-Inducing Impacts:

“Discuss the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment...Also discuss the characteristic of some projects which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively.”

The EIR claims that, “because of the industrial and commercial nature of the proposed project, buildout would not directly result in an increase in population or construction of housing.” However, the EIR excludes that the proposed project is outside of the City’s SOI, meaning that it will represent a marked increase above existing growth projections. It is clear that the proposed project has not previously been planned for development as it is outside the City of Sacramento’s Sphere of Influence area. Additionally, Figure 3.5: Community Types within the 2020 MTP/SCS identifies the project site as “Land Not Identified for Development in the MTP/SCS Planning Period,” meaning that it was not included in any growth forecasting and the MTP/SCS identifies 0 growth in these areas. Significant impacts will result from development of the proposed project, including significant and unavoidable cumulatively considerable impacts to Aesthetics, Agricultural Resources, Air Quality, and Greenhouse Gas Emissions. Since the project site was not included for analysis as an employment generating use by the City, County, or SACOG, it represents an increase in population and employment growth that was not accounted for by any agency. The EIR has not provided substantial evidence to support a less than significant finding and must be revised to include a finding of significance due to this significant and unavoidable impact.

#### **Response to Comment 16-14**

The FEIR does not adequately address the comment. The FEIR continues to assert the same argument in the DEIR that, “the project’s contribution to the overall population increase by 2035 would only be approximately 3.5 percent.” This does not account for the fact that the project site is not within the incorporated City limits or the City’s Sphere of Influence and therefore was not accounted for within the 111,515 resident total, and therefore represents an increase of 4,000 new residents above the 2035 projection. The FEIR/DEIR has not provided any relevant analysis regarding the City’s employment projections. Since the project site was not included for analysis as an employment generating use by the City, County, or SACOG, it represents an increase in population and employment growth that was not accounted for by any agency. The EIR must be revised to include a finding of significance due to this significant and unavoidable impact.

Sacramento Council of Governments (SACOG) adopted the 2020 Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS) on November 18, 2019<sup>6</sup>. Figure 3.5: Community Types within the 2020 MTP/SCS identifies the project site as “Land Not Identified for Development in the MTP/SCS Planning Period,” meaning that it was not included in any

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<sup>6</sup> SACOG 2020 MTP/SCS [https://www.sacog.org/sites/main/files/file-attachments/2020\\_mtp-scs.pdf?1580330993](https://www.sacog.org/sites/main/files/file-attachments/2020_mtp-scs.pdf?1580330993)

growth forecasting and the MTP/SCS identifies 0 growth in these areas. The MTP/SCS notes that the Established Communities in the SACOG region will add 146,053 jobs between 2016 - 2040 (Figure 3.5 Community Types and Table 3.2 Summary of Expected Housing and Employment Growth by Community Type). Utilizing the EIR's calculation of 4,000 employees, the project represents a 2.7% increase above the employment growth projections from 2016 - 2040 within all of SACOG's Established Communities. A single project accounting for this amount of the projected employment and/or population over 26 years represents a significant amount of growth. A revised EIR must be prepared to include this analysis, and also provide a cumulative analysis discussion of projects approved since 2016 and projects "in the pipeline" within Established Communities in the SACOG region to determine if the project will exceed SACOG's employment growth forecast for the Established Communities. Additionally, the revised EIR must also provide demographic and geographic information on the location of qualified workers to fill these positions in order to provide an accurate environmental analysis.

**Response to Comment 16-15**

The FEIR refers to Response to Comment 11-11, which states that, "A determination of General Plan consistency does not require consistency with virtually every policy included in the General Plan, only compliance with those applicable policies that are related to mitigating environmental impacts." Comment 16-15 asserts that the project is directly inconsistent with the listed policies that were adopted for the purposes of avoiding or mitigating an environmental effect. The FEIR/DEIR has not provided substantial evidence that the project is consistent with these policies. A revised EIR must be prepared to include a finding of significance.

**Response to Comment 16-16**

The FEIR refers to the Response to Comment 16-7, which states that, "Contrary to the commenter's claim that the proposed project does not comply with PUC Section 21676(b), SACOG prepared an ALUC Preliminary Review and provided conditions of approval for the project's compatibility with the Sacramento International Airport's ALUCP. As such, the proposed project has been provisionally approved for compatibility with the ALUCP by the SACOG ALUC. If the design of the proposed project is not consistent with the conditions of approval decided upon by the SACOG ALUC, the project would be denied, and development would not occur." However, the SACOG ALUC Preliminary Review and conditions of approval are not included for public review, which does not comply with CEQA's requirements for adequate informational documents and meaningful disclosure (CEQA § 15121 and PRC 21003(b)). Incorporation by reference (CEQA § 15150 (f)) is not appropriate as the SACOG ALUC Preliminary Review and conditions of approval contribute directly to analysis of the problem at hand. A revised EIR must be prepared to include the SACOG ALUC Preliminary Review and conditions of approval for review, analysis, and comment by the public and decision makers in order to comply with CEQA's requirements



for adequate informational documents and meaningful disclosure (CEQA § 15121 and PRC 21003(b)).

As stated in Comment Letter 16, the proposed project requires a General Plan Amendment to change the land use designation on the project site. Prior to the amendment of a General Plan, the ALUC shall review the plan, ordinance, or regulation for consistency with the ALUCP (PUC Section 21676(b))<sup>7</sup>. The FEIR utilizes SACOG's alleged review as justification for compliance with (PUC Section 21676(b))<sup>8</sup>. The FEIR/DEIR has not provided any substantial evidence to support the claim that the project complies with PUC Section 21676(b), the ALUCP, Polity LUP-1.13, and/or a less than significant findings a finding of significance must be provided in a revised EIR. Commenters reserve the right to continue this comment and analysis on this topic should the alleged SACOG ALUC Preliminary Review and conditions of approval be included in a revised EIR.

### **Response to Comment 16-17**

The FEIR provides new material information regarding the operations of the proposed hotel that is not included in the DEIR. The EIR must be revised to include this information. The FEIR asserts that, "the proposed hotel would primarily draw patronage from the nearby airport or the adjacent freeway." There is no mitigation measure proposed to require that the hotel only be utilized by airport patrons or freeway passerby. There are no VMT analysis exemptions for hotels. The operational nature of hotels is to support visitors and transient stays, and those visitors will travel by vehicle to unknown destinations of unknown vehicle trip lengths. The FEIR attempts to characterize the proposed hotel as a "local serving use" that generates few and short vehicular trips. It is not reasonable or feasible to analyze the proposed hotel through the narrow lens of a one-way vehicular trip from the airport to the hotel by its patron. Doing so only serves to skew impacts downwards and obfuscate the actual VMT generated by all uses proposed by the project. A finding of significance must be included in a revised EIR as the environmental analysis has not provided any meaningful or substantial evidence to support a less than significant finding and refuses to provide a quantified VMT analysis for the proposed hotel.

Mitigation Measure 4.12-3 in the Draft EIR states the following:

"4.12-3 Prior to the certificate of occupancy for each on-site industrial building, the owner/operator of each building shall be required to prepare and implement a VMT Reduction Plan that includes a sufficient selection of CAPCOA Trip Reduction Programs (T-6 through T-13) to reduce VMT

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<sup>7</sup> California Airport Planning Land Use Handbook Section 1.3.4. ALUC Review <https://dot.ca.gov/-/media/dot-media/programs/aeronautics/documents/californiaairportlanduseplanninghandbook-a11y.pdf>

<sup>8</sup> California Airport Planning Land Use Handbook Section 1.3.4. ALUC Review <https://dot.ca.gov/-/media/dot-media/programs/aeronautics/documents/californiaairportlanduseplanninghandbook-a11y.pdf>

by at least 22 percent, consistent with the VMT Mitigation Memorandum prepared by the City's Public Works Department for the proposed project (see Appendix Q to the EIR). CAPCOA Trip Reduction Programs T-6 through T-13 include measures such as implementing a commute trip reduction program and/or marketing, providing a rideshare program, implementing a subsidized or discounted transit program, providing end-of-trip bicycle facilities, providing employer sponsored vanpool, pricing workplace housing, and implementing employee parking cash-out. The VMT Reduction Plan shall be submitted to the City's Department of Public Works and Community Development Department for review and approval."

The FEIR/DEIR does not provide any analysis that proposed Mitigation Measure 4.12-3 will guarantee reduced VMT by the specific users of the project. A revised EIR must be prepared to include a finding of significance because there is no possible assurance of the percentage of project employees that would utilize non-automobile travel associated with implementation of Mitigation Measure 4.12-3 and mitigation of the project's VMT impact to less than significant is not feasible.

Mitigation Measure 4.12-3 does not include any required monitoring and/or enforcement by City staff. City staff is only required to review and approve the VMT Reduction Plan. After the VMT Reduction Plan is approved by City staff, they are no longer involved in VMT Reduction activities or assuring tenant adherence to the VMT Reduction Plan during operations. It is not possible, feasible, or required for the City to ensure that MM 4.12-3 will result in reduced VMT by project employees and be implemented continuously, at all times, throughout the life of the project and maintain a VMT reduction to less than significant levels at all times. A revised EIR must be prepared to include a finding of significance because there is no possible assurance of the percentage of project employees that would utilize non-automobile travel or reduce their VMT associated with implementation of Mitigation Measure 4.12-3 and mitigation of the project's VMT impact to less than significant is not feasible.

### **Response to Comment 16-18**

The FEIR states that, "SMAQMD reviewed the AQMP prepared for the proposed project, and provided a letter on June 19, 2024, verifying that the proposed project AQMP will, through on-site and offsite measures, achieve a 35 percent reduction in ozone precursors generated by mobile sources over the baseline conditions anticipated. Thus, additional mitigation measures are not required to be implemented to further reduce ROG and NOX emissions beyond what is presented in the Draft EIR." However, the SMAQMD letter referenced here is not included as an attachment for public review. This does not comply with CEQA's requirements for adequate informational documents and meaningful disclosure (CEQA § 15121 and PRC 21003(b)). Incorporation by reference (CEQA § 15150 (f)) is not appropriate as the SMAQMD letter contributes directly to analysis of the problem at hand. The FEIR/DEIR precludes meaningful decision making and/or public comment in its exclusion of the SMAQMD letter since it is utilized as justification to

support a less than significant finding. A revised EIR must be prepared to include the SMAQMD letter for review, analysis, and comment by the public and decision makers in order to comply with CEQA's requirements for adequate informational documents and meaningful disclosure (CEQA § 15121 and 21003(b)).

### **Response to Comment 16-19**

The projections for cumulative analysis must be quantified and disclosed to the public in order to provide an adequate and accurate environmental analysis. Excluding a quantified analysis of the buildout conditions of the City's 2040 General Plan and the project's impact to those projections does not comply with CEQA's requirements for adequate informational documents and meaningful disclosure (CEQA § 15121 and PRC 21003(b)). Incorporation by reference (CEQA § 15150 (f)) is not appropriate as a quantified analysis of the buildout conditions of the City's 2040 General Plan and the project's impact to those projections contribute directly to analysis of the problem at hand. The FEIR/DEIR precludes meaningful decision making and/or public comment in its exclusion of the buildout conditions of the City's 2040 General Plan since it is utilized as justification to support a less than significant finding. A revised EIR must be prepared to include a quantified analysis of the buildout conditions of the City's 2040 General Plan and the project's impact to those projections for review, analysis, and comment by the public and decision makers in order to comply with CEQA's requirements for adequate informational documents and meaningful disclosure (CEQA § 15121 and PRC 21003(b)).

Notably, Table 2-3: Growth Projections for Sacramento (2040) General Plan<sup>9</sup> within the General Plan EIR states that the City will add 76,612 jobs from 2020-2040. Table 2-4: Citywide Buildout by Concept Area states that the Employment Mixed Use designation will have 1,895 Industrial employees at buildout. Table 2-5: Citywide Buildout Summary states that Industrial employment in the entire City will increase by 8,350 jobs at buildout. Since the project site is not located within the incorporated City limits or its Sphere of Influence, the proposed project therefore represents an increase of 4,000 new employees above these projections. Notably, the proposed project's 4,000 employees will increase the quantity of Industrial employees anticipated for the entirety of the Employment Mixed Use designation by 211%, it will increase the Industrial employment growth for the entire City by 47%, and increase total employment growth for the entire city by 5.2%. The EIR has not provided any analysis regarding the City General Plan buildout scenario including all cumulative development constructed since adoption, approved projects not yet constructed, and "projects in the pipeline." A revised EIR must be prepared to include this analysis in order to provide an adequate and accurate environmental analysis and include a finding of significance as the project will induce growth in the area and exceeds the General Plan buildout scenario for the Employment Mixed-Use designation that was developed for the purpose of

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<sup>9</sup> <https://www.cityofsacramento.gov/content/dam/portal/cdd/Planning/Environmental-Impact-Reports/2040-gpu-and-caap/Sacramento-2040-Project-MEIR-8242023.pdf>

avoiding or mitigating an environmental effect (reduce VMT/GHG and improve air quality via compact mixed-use development).

### **Response to Comment 16-20**

The FEIR refers to Response to Comment 16-17. The FEIR provides new material information regarding the operations of the proposed hotel that is not included in the DEIR. The EIR must be revised to include this information. The FEIR asserts that, “the proposed hotel would primarily draw patronage from the nearby airport or the adjacent freeway.” There is no mitigation measure proposed to require that the hotel only be utilized by airport patrons or freeway passerby. There are no VMT analysis exemptions for hotels. The operational nature of hotels is to support visitors and transient stays, and those visitors will travel by vehicle to unknown destinations of unknown vehicle trip lengths. The FEIR attempts to characterize the proposed hotel as a “local serving use” that generates few and short vehicular trips. It is not reasonable or feasible to analyze the proposed hotel through the narrow lens of a one-way vehicular trip from the airport to the hotel by its patron. Doing so only serves to skew impacts downwards and obfuscate the actual VMT generated by all uses proposed by the project. A finding of significance must be included in a revised EIR as the environmental analysis has not provided any meaningful or substantial evidence to support a less than significant finding and refuses to provide a quantified VMT analysis for the proposed hotel.

Mitigation Measure 4.12-3 in the Draft EIR states the following:

“4.12-3 Prior to the certificate of occupancy for each on-site industrial building, the owner/operator of each building shall be required to prepare and implement a VMT Reduction Plan that includes a sufficient selection of CAPCOA Trip Reduction Programs (T-6 through T-13) to reduce VMT by at least 22 percent, consistent with the VMT Mitigation Memorandum prepared by the City’s Public Works Department for the proposed project (see Appendix Q to the EIR). CAPCOA Trip Reduction Programs T-6 through T-13 include measures such as implementing a commute trip reduction program and/or marketing, providing a rideshare program, implementing a subsidized or discounted transit program, providing end-of-trip bicycle facilities, providing employer sponsored vanpool, pricing workplace housing, and implementing employee parking cash-out. The VMT Reduction Plan shall be submitted to the City’s Department of Public Works and Community Development Department for review and approval.”

The FEIR/DEIR does not provide any analysis that proposed Mitigation Measure 4.12-3 will guarantee reduced VMT by the specific users of the project. A revised EIR must be prepared to include a finding of significance because there is no possible assurance of the percentage of project employees that would utilize non-automobile travel associated with implementation of Mitigation Measure 4.12-3 and mitigation of the project’s VMT impact to less than significant is not feasible.

Mitigation Measure 4.12-3 does not include any required monitoring and/or enforcement by City staff. City staff is only required to review and approve the VMT Reduction Plan. After the VMT Reduction Plan is approved by City staff, they are no longer involved in VMT Reduction activities or assuring tenant adherence to the VMT Reduction Plan during operations. It is not possible, feasible, or required for the City to ensure that MM 4.12-3 will result in reduced VMT by project employees and be implemented continuously, at all times, throughout the life of the project and maintain a VMT reduction to less than significant levels at all times. A revised EIR must be prepared to include a finding of significance because there is no possible assurance of the percentage of project employees that would utilize non-automobile travel or reduce their VMT associated with implementation of Mitigation Measure 4.12-3 and mitigation of the project's VMT impact to less than significant is not feasible.

### **Response to Comment 16-21**

The FEIR references California Code of Regulations Title 14 Section 15064.3 that requires automobile traffic be considered for VMT analysis. Title 14 of the California Code of Regulations does not define the term “automobile.” CEQA statute also does not define the term “automobile.” The Governor’s Office of Planning and Research (OPR) 2018 CEQA Guidelines Technical Advisory<sup>10</sup> are purely advisory, as stated in its introduction:

“The purpose of this document is to provide advice and recommendations, which agencies and other entities may use at their discretion. This document does not alter lead agency discretion in preparing environmental documents subject to CEQA. This document should not be construed as legal advice.”

The OPR 2018 CEQA Guidelines Technical Advisory is not a legal interpretation, court decision, or amendment to the CEQA statute that provides a substitute threshold of significance.

The VMT analysis relies upon the OPR 2018 CEQA Guidelines Technical Advisory and its statement that, “‘vehicle miles traveled’ refers to the amount and distance of automobile travel attributable to a project,” where automobile refers to passenger vehicles, specifically cars and light trucks,” (which is the OPR *interpretation* of PRC Section 15064.3) to conclude that the project will have less than significant impacts. As stated above, the term “automobile” is not defined in the CEQA statute or California Code of Regulations Title 14, and application of the OPR interpretation is speculative and does not provide an analysis of the “worst-case scenario” for environmental impacts. Widespread public understanding and perception indicates that trucks, including medium/heavy-duty truck/trailer trips associated with the industrial nature of warehouse operations, are automobiles. A revised EIR must be prepared to include all truck/trailer and

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<sup>10</sup> Governor’s Office of Planning and Research Technical Advisory on Evaluating Transportation Impacts in CEQA [https://opr.ca.gov/ceqa/docs/20190122-743\\_Technical\\_Advisory.pdf](https://opr.ca.gov/ceqa/docs/20190122-743_Technical_Advisory.pdf)

operational delivery van activity for quantified VMT analysis. The operational nature of industrial/warehouse uses involves high rates of truck/trailer and delivery van VMT due to traveling from large regional distribution centers to smaller industrial parks and then to their final delivery destinations. Once employees arrive at the industrial buildings for work, they will conduct their jobs by driving truck/trailer/delivery vans across the region as part of the daily operations as a warehouse, which will drastically increase project-generated VMT. The project's truck/trailer/delivery van activity is unable to utilize public transit or active transportation and it is misleading to the public and decision makers to exclude this activity from VMT analysis. A revised EIR must be prepared to reflect a quantified VMT analysis that includes all truck/trailer and delivery van activity to adequately and accurately analyze the potentially significant project transportation impacts.

### **Response to Comment 16-23**

The FEIR refers to Response to Comment 16-17. The FEIR provides new material information regarding the operations of the proposed hotel that is not included in the DEIR. The EIR must be revised to include this information. The FEIR asserts that, "the proposed hotel would primarily draw patronage from the nearby airport or the adjacent freeway." There is no mitigation measure proposed to require that the hotel only be utilized by airport patrons or freeway passerby. There are no VMT analysis exemptions for hotels. The operational nature of hotels is to support visitors and transient stays, and those visitors will travel by vehicle to unknown destinations of unknown vehicle trip lengths. The FEIR attempts to characterize the proposed hotel as a "local serving use" that generates few and short vehicular trips. It is not reasonable or feasible to analyze the proposed hotel through the narrow lens of a one-way vehicular trip from the airport to the hotel by its patron. Doing so only serves to skew impacts downwards and obfuscate the actual VMT generated by all uses proposed by the project. A finding of significance must be included in a revised EIR as the environmental analysis has not provided any meaningful or substantial evidence to support a less than significant finding and refuses to provide a quantified VMT analysis for the proposed hotel.

Mitigation Measure 4.12-3 in the Draft EIR states the following:

"4.12-3 Prior to the certificate of occupancy for each on-site industrial building, the owner/operator of each building shall be required to prepare and implement a VMT Reduction Plan that includes a sufficient selection of CAPCOA Trip Reduction Programs (T-6 through T-13) to reduce VMT by at least 22 percent, consistent with the VMT Mitigation Memorandum prepared by the City's Public Works Department for the proposed project (see Appendix Q to the EIR). CAPCOA Trip Reduction Programs T-6 through T-13 include measures such as implementing a commute trip reduction program and/or marketing, providing a rideshare program, implementing a subsidized or discounted transit program, providing end-of-trip bicycle facilities, providing employer sponsored vanpool, pricing workplace housing, and implementing employee parking cash-out. The



VMT Reduction Plan shall be submitted to the City's Department of Public Works and Community Development Department for review and approval."

The FEIR/DEIR does not provide any analysis that proposed Mitigation Measure 4.12-3 will guarantee reduced VMT by the specific users of the project. A revised EIR must be prepared to include a finding of significance because there is no possible assurance of the percentage of project employees that would utilize non-automobile travel associated with implementation of Mitigation Measure 4.12-3 and mitigation of the project's VMT impact to less than significant is not feasible.

Mitigation Measure 4.12-3 does not include any required monitoring and/or enforcement by City staff. City staff is only required to review and approve the VMT Reduction Plan. After the VMT Reduction Plan is approved by City staff, they are no longer involved in VMT Reduction activities or assuring tenant adherence to the VMT Reduction Plan during operations. It is not possible, feasible, or required for the City to ensure that MM 4.12-3 will result in reduced VMT by project employees and be implemented continuously, at all times, throughout the life of the project and maintain a VMT reduction to less than significant levels at all times. A revised EIR must be prepared to include a finding of significance because there is no possible assurance of the percentage of project employees that would utilize non-automobile travel or reduce their VMT associated with implementation of Mitigation Measure 4.12-3 and mitigation of the project's VMT impact to less than significant is not feasible.

#### **Response to Comment 16-24**

The FEIR acknowledges that individual sites plans are, "necessary to provide the level of detail necessary for the analysis of the possibility of the project to substantially increase hazards to a geometric design feature, related to maneuvering and queuing of heavy vehicles." The RTC states that this analysis will be conducted after the conclusion of public review and the CEQA process as it, "will be subject to approval by the City regarding safe access, including heavy vehicle and automobile maneuvering and queueing. Approval of such will be based on the applicable City standards and guidelines in place at the time of review, as well as industry standards, and the particular project characteristics. Relevant standards include City driveway spacing and circulation standards. Because site-specific approvals are not currently being processed, site-specific review of such details is not required at this time. The project description does not contain any specifics which would preclude meeting circulation standards in the future."

Delaying review of the project in accordance with City requirements to after the conclusion of public review and the CEQA process is project implementation without CEQA review and does not comply with CEQA's requirements for meaningful disclosure and adequate informational documents (CEQA § 15121 and PRC 21003(b)). The DEIR is a Project EIR pursuant to CEQA Guidelines Section 15161, which requires a detailed site plan for each site in order to conduct

project-specific review of all impact thresholds. It is immaterial if the FEIR claims that “site-specific approvals are not currently being processed,” because the DEIR is required to provide a project-specific analysis as required by CEQA Guidelines Section 15161. A revised EIR must be prepared to include a finding of significance as the FEIR/DEIR has not provided any substantial evidence to support a less than significant finding.

### **Response to Comment 16-26**

The FEIR refers to Responses to Comments 16-13 and 16-14. These responses do not adequately address the comment. CEQA Guidelines Section 15126.2(e) states regarding analysis of Growth-Inducing Impacts:

“Discuss the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment...Also discuss the characteristic of some projects which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively.”

The EIR claims that, “because of the industrial and commercial nature of the proposed project, buildout would not directly result in an increase in population or construction of housing.” However, the EIR excludes that the proposed project is outside of the City’s SOI, meaning that it will represent a marked increase above existing growth projections. It is clear that the proposed project has not previously been planned for development as it is outside the City of Sacramento’s Sphere of Influence area. Additionally, Figure 3.5: Community Types within the 2020 MTP/SCS identifies the project site as “Land Not Identified for Development in the MTP/SCS Planning Period,” meaning that it was not included in any growth forecasting and the MTP/SCS identifies 0 growth in these areas. Significant impacts will result from development of the proposed project, including significant and unavoidable cumulatively considerable impacts to Aesthetics, Agricultural Resources, Air Quality, and Greenhouse Gas Emissions. Since the project site was not included for analysis as an employment generating use by the City, County, or SACOG, it represents an increase in population and employment growth that was not accounted for by any agency. The EIR has not provided substantial evidence to support a less than significant finding and must be revised to include a finding of significance due to this significant and unavoidable impact.

The FEIR continues to assert the same argument in the DEIR that, “the project’s contribution to the overall population increase by 2035 would only be approximately 3.5 percent.” This does not account for the fact that the project site is not within the incorporated City limits or the City’s Sphere of Influence and therefore was not accounted for within the 111,515 resident total, and therefore represents an increase of 4,000 new residents above the 2035 projection. The FEIR/DEIR has not provided any relevant analysis regarding the City’s employment projections. Since the



project site was not included for analysis as an employment generating use by the City, County, or SACOG, it represents an increase in population and employment growth that was not accounted for by any agency. The EIR must be revised to include a finding of significance due to this significant and unavoidable impact.

Sacramento Council of Governments (SACOG) adopted the 2020 Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS) on November 18, 2019<sup>11</sup>. Figure 3.5: Community Types within the 2020 MTP/SCS identifies the project site as “Land Not Identified for Development in the MTP/SCS Planning Period,” meaning that it was not included in any growth forecasting and the MTP/SCS identifies 0 growth in these areas. The MTP/SCS notes that the Established Communities in the SACOG region will add 146,053 jobs between 2016 - 2040 (Figure 3.5 Community Types and Table 3.2 Summary of Expected Housing and Employment Growth by Community Type). Utilizing the EIR’s calculation of 4,000 employees, the project represents a 2.7% increase above the employment growth projections from 2016 - 2040 within all of SACOG’s Established Communities. A single project accounting for this amount of the projected employment and/or population over 26 years represents a significant amount of growth. A revised EIR must be prepared to include this analysis, and also provide a cumulative analysis discussion of projects approved since 2016 and projects “in the pipeline” within Established Communities in the SACOG region to determine if the project will exceed SACOG’s employment growth forecast for the Established Communities. Additionally, the revised EIR must also provide demographic and geographic information on the location of qualified workers to fill these positions in order to provide an accurate environmental analysis.

### **Response to Comment 16-27**

The FEIR refers to Responses to Comments 16-13, 16-14, and 16-19. These responses do not adequately address the comment. CEQA Guidelines Section 15126.2(e) states regarding analysis of Growth-Inducing Impacts:

“Discuss the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment...Also discuss the characteristic of some projects which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively.”

The EIR claims that, “because of the industrial and commercial nature of the proposed project, buildout would not directly result in an increase in population or construction of housing.” However, the EIR excludes that the proposed project is outside of the City’s SOI, meaning that it will represent a marked increase above existing growth projections. It is clear that the proposed

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<sup>11</sup> SACOG 2020 MTP/SCS [https://www.sacog.org/sites/main/files/file-attachments/2020\\_mtp-scs.pdf?1580330993](https://www.sacog.org/sites/main/files/file-attachments/2020_mtp-scs.pdf?1580330993)

project has not previously been planned for development as it is outside the City of Sacramento's Sphere of Influence area. Additionally, Figure 3.5: Community Types within the 2020 MTP/SCS identifies the project site as "Land Not Identified for Development in the MTP/SCS Planning Period," meaning that it was not included in any growth forecasting and the MTP/SCS identifies 0 growth in these areas. Significant impacts will result from development of the proposed project, including significant and unavoidable cumulatively considerable impacts to Aesthetics, Agricultural Resources, Air Quality, and Greenhouse Gas Emissions. Since the project site was not included for analysis as an employment generating use by the City, County, or SACOG, it represents an increase in population and employment growth that was not accounted for by any agency. The EIR has not provided substantial evidence to support a less than significant finding and must be revised to include a finding of significance due to this significant and unavoidable impact.

The FEIR continues to assert the same argument in the DEIR that, "the project's contribution to the overall population increase by 2035 would only be approximately 3.5 percent." This does not account for the fact that the project site is not within the incorporated City limits or the City's Sphere of Influence and therefore was not accounted for within the 111,515 resident total, and therefore represents an increase of 4,000 new residents above the 2035 projection. The FEIR/DEIR has not provided any relevant analysis regarding the City's employment projections. Since the project site was not included for analysis as an employment generating use by the City, County, or SACOG, it represents an increase in population and employment growth that was not accounted for by any agency. The EIR must be revised to include a finding of significance due to this significant and unavoidable impact.

Sacramento Council of Governments (SACOG) adopted the 2020 Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS) on November 18, 2019<sup>12</sup>. Figure 3.5: Community Types within the 2020 MTP/SCS identifies the project site as "Land Not Identified for Development in the MTP/SCS Planning Period," meaning that it was not included in any growth forecasting and the MTP/SCS identifies 0 growth in these areas. The MTP/SCS notes that the Established Communities in the SACOG region will add 146,053 jobs between 2016 - 2040 (Figure 3.5 Community Types and Table 3.2 Summary of Expected Housing and Employment Growth by Community Type). Utilizing the EIR's calculation of 4,000 employees, the project represents a 2.7% increase above the employment growth projections from 2016 - 2040 within all of SACOG's Established Communities. A single project accounting for this amount of the projected employment and/or population over 26 years represents a significant amount of growth. A revised EIR must be prepared to include this analysis, and also provide a cumulative analysis discussion of projects approved since 2016 and projects "in the pipeline" within Established

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<sup>12</sup> SACOG 2020 MTP/SCS [https://www.sacog.org/sites/main/files/file-attachments/2020\\_mtp-scs.pdf?1580330993](https://www.sacog.org/sites/main/files/file-attachments/2020_mtp-scs.pdf?1580330993)

Communities in the SACOG region to determine if the project will exceed SACOG's employment growth forecast for the Established Communities. Additionally, the revised EIR must also provide demographic and geographic information on the location of qualified workers to fill these positions in order to provide an accurate environmental analysis.

The projections for cumulative analysis must be quantified and disclosed to the public in order to provide an adequate and accurate environmental analysis. Excluding a quantified analysis of the buildout conditions of the City's 2040 General Plan and the project's impact to those projections does not comply with CEQA's requirements for adequate informational documents and meaningful disclosure (CEQA § 15121 and PRC 21003(b)). Incorporation by reference (CEQA § 15150 (f)) is not appropriate as a quantified analysis of the buildout conditions of the City's 2040 General Plan and the project's impact to those projections contribute directly to analysis of the problem at hand. The FEIR/DEIR precludes meaningful decision making and/or public comment in its exclusion of the buildout conditions of the City's 2040 General Plan since it is utilized as justification to support a less than significant finding. A revised EIR must be prepared to include a quantified analysis of the buildout conditions of the City's 2040 General Plan and the project's impact to those projections for review, analysis, and comment by the public and decision makers in order to comply with CEQA's requirements for adequate informational documents and meaningful disclosure (CEQA § 15121 and PRC 21003(b)).

Notably, Table 2-3: Growth Projections for Sacramento (2040) General Plan<sup>13</sup> within the General Plan EIR states that the City will add 76,612 jobs from 2020-2040. Table 2-4: Citywide Buildout by Concept Area states that the Employment Mixed Use designation will have 1,895 Industrial employees at buildout. Table 2-5: Citywide Buildout Summary states that Industrial employment in the entire City will increase by 8,350 jobs at buildout. Since the project site is not located within the incorporated City limits or its Sphere of Influence, the proposed project therefore represents an increase of 4,000 new employees above these projections. Notably, the proposed project's 4,000 employees will increase the quantity of Industrial employees anticipated for the entirety of the Employment Mixed Use designation by 211%, it will increase the Industrial employment growth for the entire City by 47%, and increase total employment growth for the entire city by 5.2%. The EIR has not provided any analysis regarding the City General Plan buildout scenario including all cumulative development constructed since adoption, approved projects not yet constructed, and "projects in the pipeline." A revised EIR must be prepared to include this analysis in order to provide an adequate and accurate environmental analysis and include a finding of significance as the project will induce growth in the area and exceeds the General Plan buildout scenario for the Employment Mixed-Use designation that was developed for the purpose of

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<sup>13</sup> <https://www.cityofsacramento.gov/content/dam/portal/cdd/Planning/Environmental-Impact-Reports/2040-gpu-and-caap/Sacramento-2040-Project-MEIR-8242023.pdf>

avoiding or mitigating an environmental effect (reduce VMT/GHG and improve air quality via compact mixed-use development).

### **Response to Comment 16-28**

The FEIR cites CEQA Guidelines Section 15126.6(f) that states, “The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determined could feasibly attain most of the basic objectives of the project.” The alternatives analyzed in the DEIR do not avoid or substantially lessen the significant effects of the proposed project. The alternative projects analyzed achieve only minor reductions to significant effects, which the DEIR characterizes as “fewer” than the significant and unavoidable impacts, but impacts would remain significant and unavoidable nonetheless. Alternative project impacts remaining significant and unavoidable are not “substantially less” than the significant and unavoidable impacts of the proposed project. The DEIR/FEIR has not complied with CEQA Guidelines Section 15126.6. A revised EIR must be prepared to include an alternatives analysis that includes a reasonable range of alternatives that complies with CEQA Guidelines Section 15126.6 in order to foster informed decision making. This must include alternatives that avoid or substantially lessen significant effects of the project.

### **3.0 Project Description**

The EIR does not include a floor plan, detailed site plan, or a conceptual grading plan. The basic components of a Planning Application include a detailed site plan, floor plan, conceptual grading plan, written narrative, and detailed elevations. The site plan provided in Figure 3-3: Site Plan has been edited for public review to remove meaningful information. Figure 3-3 excludes all of the key notes, legend, and important site data such as parking and site coverage. Notably, even though the Executive Summary states that the EIR provides a project-specific analysis pursuant to CEQA Guidelines Section 15161 for all areas except the non-participating parcels, Figure 3-3: Site Plan does not include any useful information that would be utilized for analysis, such as the location of the truck/trailer loading docks, passenger car parking spaces, and truck/trailer parking spaces. All of these basic items are necessary to conduct any type of analysis, and the EIR is inadequate as an informational document as it is not possible to ascertain any meaningful analysis based upon the information provided.

There are also no architectural building elevations provided. The renderings included in Figure 4.1-6 through 4.1-8 do not provide the height of the buildings, paint colors, or building materials. The EIR has also excluded a grading plan from public review. The EIR states that “Approximately 304,000 cubic yards of soil would be imported during grading,” yet there is no method for the public to verify this claim. Providing the grading plan and earthwork quantity notes is vital as this directly informs the quantity of necessary truck hauling trips due to soil import/export during the

grading phase of construction. A revised EIR must be prepared to include wholly accurate and unedited detailed floor plan, grading plan, site plan, and project narrative for public review.

Further, the EIR is inadequate as it does not provide detailed information regarding the requests associated with each of the discretionary actions. For example, the EIR briefly lists a few of the requests associated with the M-1 and HC PUD, but has excluded the PUD Schematic Plan and PUD Guidelines from public review. The project also requires discretionary approval of a Tentative Master Parcel Map, Development Agreement, Finance Plan, and Property Tax Exchange Agreement, none of which are included for public review as part of the EIR. This does not comply with CEQA's requirements for adequate informational documents and meaningful disclosure (CEQA § 15121 and 21003(b)). Incorporation by reference (CEQA § 15150 (f)) is not appropriate as the complete PUD Schematic Plan, PUD Guidelines, Tentative Master Parcel Map, Development Agreement, Finance Plan, and Property Tax Exchange Agreement contribute directly to analysis of the problem at hand. A revised EIR must be prepared to include the complete PUD Schematic Plan, PUD Guidelines, Tentative Master Parcel Map, Development Agreement, Finance Plan, and Property Tax Exchange Agreement for review, analysis, and comment by the public and decision makers in order to comply with CEQA's requirements for adequate informational documents and meaningful disclosure (CEQA § 15121 and 21003(b)).

#### **4.7 Hazards and Hazardous Materials**

The EIR states that, "the western portion of the project site is located within Safety Zone 3, which is designated "Inner Turning Zone", the south-central portion of the site is located within Safety Zone 4, which is designated "Outer Approach/Departure Zone", and the eastern portion of the project site is located within Safety Zone 6, which is designated "Traffic Pattern Zone"" of the Sacramento International Airport LUCP<sup>14</sup>. The EIR concludes the project will have less than significant impacts because, "all future uses would be required to comply with the criteria for conditional uses, as shown in Table 2 of the ALUCP, to ensure safety compatibility with the Sacramento International Airport." The EIR does not provide any meaningful evidence to support a less than significant finding. The EIR is misleading to the public and decision makers by excluding information regarding the statutorily required review by SACOG ALUC. The proposed project requires a General Plan Amendment to change the land use designation on the project site. Prior to the amendment of a General Plan, the ALUC shall review the plan, ordinance, or regulation for consistency with the ALUCP (PUC Section 21676(b))<sup>15</sup>. While the Project Description of the EIR states that SACOG ALUC review is required, it is excluded from analysis within this section.

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<sup>14</sup> <https://www.sacog.org/home/showpublisheddocument/1754/638376327338000000>

<sup>15</sup> California Airport Planning Land Use Handbook Section 1.3.4. ALUC Review <https://dot.ca.gov/-/media/dot-media/programs/aeronautics/documents/californiaairportlanduseplanninghandbook-a11y.pdf>

The EIR must be revised to include a finding of significance as the project does not comply with PUC Section 21676(b).

Notably, the Land Use and Planning analysis states that, “on July 27, 2023, SACOG prepared an ALUC Preliminary Review to determine the proposed project’s compatibility with the SMF ALUCP,” and SACOG provided conditions of approval. However, the SACOG ALUC Preliminary Review and conditions of approval are not included for public review, which does not comply with CEQA’s requirements for adequate informational documents and meaningful disclosure (CEQA § 15121 and 21003(b)). Incorporation by reference (CEQA § 15150 (f)) is not appropriate as the SACOG ALUC Preliminary Review and conditions of approval contribute directly to analysis of the problem at hand. A revised EIR must be prepared to include the SACOG ALUC Preliminary Review and conditions of approval for review, analysis, and comment by the public and decision makers in order to comply with CEQA’s requirements for adequate informational documents and meaningful disclosure (CEQA § 15121 and 21003(b)).

#### **4.9 Land Use and Planning/Population and Housing**

It must first be noted that the proposed project is not consistent with the proposed General Plan land use designation of Employment Mixed Use. The City’s General Plan states that the Employment Mixed Use designation, “is intended to buffer residential uses from more intense *industrial* and *service commercial* activities and to provide compatible employment uses near higher-density and mixed-use housing. This designation provides for a range of *light industrial* and *high technology* uses.” The industrial portion of the project is exclusively warehousing and distribution, which is an intense segment of the broad light industrial category that involves high rates of truck trips. The project is consistent with the Industrial Mixed Use designation, which “provides for manufacturing, warehousing, and other employment-generating uses that may produce loud noise or odors and tend to have a high volume of truck traffic.” However, the Industrial Mixed Use designation, “should not be located next to a residential neighborhood without substantial buffers (i.e., office uses, regional parks, greenways, or open space),” meaning that it should not be applied to the project site even though it is the appropriate land use designation for the proposed warehousing and distribution aspect of the project. The EIR must be revised to include this information for analysis and include a finding of significance as the proposed project is not consistent with the Employment Mixed Use designation.

The project faces significant inconsistencies with statutory requirements of the Housing Crisis Act (HCA) of 2019/Senate Bill (SB) 330<sup>16</sup>/SB 8<sup>17</sup>. The HCA/SB 330/SB 8 require replacement

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<sup>16</sup> Housing Crisis Act of 2019/SB 330

[https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill\\_id=201920200SB330](https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=201920200SB330)

<sup>17</sup> SB 8 [https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill\\_id=202120220SB8](https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=202120220SB8)



housing sites when land designated for housing development experience land use changes to ensure no net loss of housing capacity. The EIR states that, “based on the existing Sacramento County General Plan land use and zoning designations for the project site, residential development was not anticipated at the project site.” However, this statement is erroneous and misleading to the public and decision makers and must be replaced with factual information as part of a revised EIR. The project site has an existing Sacramento County Land Use Element designation of Agricultural Cropland<sup>18</sup>, which “allows single family dwelling units at a density no greater than 40 acres per unit.” Therefore, the 474.4 acre project site has an existing residential development capacity of 11 dwelling units.

Government Code Section 66300(b)(1)(A) requires that agencies shall not “change the general plan land use designation, specific plan land use designation, or zoning to a less intensive use below what was allowed under the land use designation and zoning ordinances in effect at the time of the proposed change.” Under Government Code Section 66300(b)(1)(A), a “less intensive use” includes, but is not limited to, reductions to height, density, or floor area ratio, new or increased open space or lot size requirements, or new or increased setback requirements, minimum frontage requirements, or maximum lot coverage limitations, or any other action that would individually or cumulatively reduce residential development capacity. Pursuant to SB 330, replacement capacity for any displaced residential units must be provided **concurrently** at the **time of project approval.**

Government Code Section 66300 (h)(i)(1) states that, “this section does not prohibit an affected county or an affected city, including the local electorate acting through the initiative process, from changing a land use designation or zoning ordinance to a less intensive use, or reducing the intensity of land use, if the city or county concurrently changes the development standards, policies, and conditions applicable to other parcels within the jurisdiction to ensure that there is no net loss in residential capacity.” As calculated above, the project site’s Sacramento County Land Use Element designation of Agricultural Cropland provides development capacity for 11 residential units. Adoption of the proposed SOI Amendment, General Plan Amendment, and Rezoning as part of the proposed project will result in a reduction of the existing residential development capacity by 11 units to a decreased development capacity of 0 residential units.

This is in conflict with SB 8 that expanded the provisions of the HCA to include Government Code Section 66300 (h)(i)(1) requiring concurrent approval of replacement sites to ensure no net loss in residential capacity, and Section 66300 (h)(2)(A) defining “concurrently” to mean the action is approved at the same meeting of the legislative body. The EIR has not identified replacement sites for the net loss in residential capacity for 11 units as a result of project implementation. The loss

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<sup>18</sup> <https://planning.saccounty.gov/Documents/B12.%20Land%20Use%20Element%20Amended%2012-13-22.pdf>



in residential capacity must be included as a finding of significance as part of a revised EIR. The EIR does not act in conformance with the HCA/SB 330/SB 8 and the lost zoning capacity of any dwelling units is a significant environmental impact in violation of the HCA/SB 330/SB 8. The EIR must be revised to include a finding of significance due to this inconsistency.

Additionally, deferring the environmental analysis of construction and operation of replacement sites to a later date is project piecemealing in violation of CEQA. The EIR does not accurately or adequately describe the project, meaning “the whole of an action, which has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment” (CEQA § 15378). The whole of the action must statutorily and legally include the identification of replacement sites and all associated actions required to implement development of at least 11 residential units.

Table 4.9-6 Discussion of Relevant Sacramento LAFCo Policies provides erroneous and misleading consistency analysis. For example, the EIR concludes the project is consistent with “LAFCo Policy I(6): Amendment proposals involving Sphere expansion which contain prime agricultural land will not be approved by the LAFCo if there is sufficient alternative land available for annexation within the existing Sphere of Influence,” by citing analysis that, “an alternate location within the City is not currently available to serve the proposed project,” and “buildout of the site on alternative land outside, but adjacent to, the City’s SOI would likely result in similar conversion of Farmland as the proposed project, given the prevalence of agricultural land adjacent to the City’s SOI.” The EIR discusses land outside the SOI and land within the incorporated City limits. The EIR has not provided any analysis of the issue identified in Policy I(6), which regards alternative land within the existing Sphere of Influence. The EIR must be revised to include a finding of significance as it has not provided any meaningful evidence to support a less than significant finding.

The proposed project requests approval of a PUD (Schematic Plan and PUD Guidelines) for the both the M-1 and HC areas. The EIR states that, “the PUD Guidelines developed for the project site include design standards for site design, building design, landscaping, signage, and lighting.” However, the complete PUD guidelines are not included for public review, which does not comply with CEQA’s requirements for adequate informational documents and meaningful disclosure (CEQA § 15121 and 21003(b)). Incorporation by reference (CEQA § 15150 (f)) is not appropriate as the complete PUD guidelines contribute directly to analysis of the problem at hand. A revised EIR must be prepared to include the complete PUD guidelines for review, analysis, and comment by the public and decision makers in order to comply with CEQA’s requirements for adequate informational documents and meaningful disclosure (CEQA § 15121 and 21003(b)).

The EIR concludes that, “the proposed project would be consistent with the City of Sacramento 2040 General Plan and Planning and Development Code.” However, the EIR has not provided any meaningful evidence to support this claim. For example, the proposed convenience store associated with the gas station/car wash is 8,100 square feet (per Appendix N Traffic Impact Analysis), while Sacramento Municipal Code Section 17.224.410 (HC zone—Permitted uses) limits retail stores to 5,000 square feet in size. The EIR must be revised to include a finding of significance as the proposed project does not comply with the Sacramento Municipal Code.

The EIR states that, “the determination of significance is based on whether population growth associated with a project has been previously planned for, and whether such growth could result in indirect impacts from associated development.” It is clear that the proposed project has not previously been planned for urban development as it is designated for Agricultural uses by the County of Sacramento and is outside the City of Sacramento’s Sphere of Influence area. Impacts will result from development of the proposed project, including significant and unavoidable cumulatively considerable impacts to Aesthetics, Agricultural Resources, Air Quality, and Greenhouse Gas Emissions. Since the project site was not included for analysis as an employment generating use by the City, County, or SACOG, it represents an increase in population and employment growth that was not accounted for by any agency. The EIR must be revised to include a finding of significance due to this significant and unavoidable impact.

The EIR also utilizes uncertain language and does not provide any meaningful analysis or supporting evidence to substantiate the conclusion that there will be no significant impacts to population and housing. For example, the EIR states that, “while the project could indirectly attract residents to the area for employment opportunities, new employees would *likely* be drawn from current residents in the *surrounding area*,” and the geographic boundaries of the “surrounding area” are undefined. Relying on the entire labor force within an undefined distance, notably the greater SACOG region, to fill the project’s construction and operational jobs will increase rates of VMT and emissions during all phases of construction and operations and an EIR must be prepared to account for longer worker trip distances. This uncertain language is not supported by any information such as the current unemployment rates in the City/County or evidence that the unemployed population is qualified for or interested in work in the industrial sector. The EIR must be revised to include a finding of significance as it has not provided any meaningful evidence to support a less than significant finding.

The EIR continues by stating that, “Conservatively estimating that all permanent positions associated with the project would be filled by new residents to the *Sacramento region* and assuming that the proposed project would be fully built out and operating at full capacity by 2035, the project’s contribution to the overall population increase by 2035 would be approximately 3.5 percent (4,000 new residents ÷ 111,515 residents). Thus, the increase in jobs would be *relatively*

*small* compared to the City's existing and anticipated population levels." It must be noted that the project site is not within the incorporated City limits or the City's Sphere of Influence and therefore was not accounted for within the 111,515 resident total, and therefore represents an increase of 4,000 new residents above the 2035 projection. The EIR has not provided any relevant analysis regarding the City's employment projections. Since the project site was not included for analysis as an employment generating use by the City, County, or SACOG, it represents an increase in population and employment growth that was not accounted for by any agency. The EIR must be revised to include a finding of significance due to this significant and unavoidable impact.

Sacramento Council of Governments (SACOG) adopted the 2020 Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS) on November 18, 2019<sup>19</sup>. Figure 3.5: Community Types within the 2020 MTP/SCS identifies the project site as "Land Not Identified for Development in the MTP/SCS Planning Period," meaning that it was not included in any growth forecasting and the MTP/SCS identifies 0 growth in these areas. The MTP/SCS notes that the Established Communities in the SACOG region will add 146,053 jobs between 2016 - 2040 (Figure 3.5 Community Types and Table 3.2 Summary of Expected Housing and Employment Growth by Community Type). Utilizing the EIR's calculation of 4,000 employees, the project represents a 2.7% increase above the employment growth projections from 2016 - 2040 within all of SACOG's Established Communities. A single project accounting for this amount of the projected employment and/or population over 26 years represents a significant amount of growth. A revised EIR must be prepared to include this analysis, and also provide a cumulative analysis discussion of projects approved since 2016 and projects "in the pipeline" within Established Communities in the SACOG region to determine if the project will exceed SACOG's employment growth forecast for the Established Communities. Additionally, the revised EIR must also provide demographic and geographic information on the location of qualified workers to fill these positions in order to provide an accurate environmental analysis.

Table 4.9-7 City of Sacramento 2040 General Plan and SMF Land Use Compatibility Plan Policy Discussion does not provide a consistency analysis with all plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect. The project has significant potential to conflict with many of these items applicable to the project site, including but not limited to the following from the City General Plan:

1. Goal LUP-1 A compact urban footprint and sustainable development pattern with infrastructure that supports efficient delivery of public services while protecting surrounding open space lands.

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<sup>19</sup> SACOG 2020 MTP/SCS [https://www.sacog.org/sites/main/files/file-attachments/2020\\_mtp-scs.pdf?1580330993](https://www.sacog.org/sites/main/files/file-attachments/2020_mtp-scs.pdf?1580330993)

2. LUP-1.1 Compact Urban Footprint. The City shall promote a land- and resource-efficient development pattern and the placement of infrastructure to support efficient delivery of public services and conserve open space, reduce vehicle miles traveled, and improve air quality.
3. LUP-1.8 Jobs-Housing Balance. The City shall encourage a balance between job type, the workforce, and housing development to reduce the negative impacts of long commutes and provide a range of employment opportunities for all city residents.
4. LUP-1.11 Coordinate to Protect Farmland. The City shall continue to work with Sacramento County and other adjacent jurisdictions to implement conservation plans, preserve farmland and protect critical habitat outside the city.
5. LUP-4.6 Compatibility with Adjoining Uses. The City shall ensure that the introduction of higher-intensity mixed-use development along major arterial corridors is compatible with adjacent land uses, particularly residential uses, by requiring features such as the following: Buildings set back from rear or side yard property lines adjoining single-unit dwelling residential uses; Building heights stepped back from sensitive adjoining uses to maintain appropriate transitions in scale and to minimize impacts to privacy and solar access; Landscaped off-street parking areas, loading areas, and service areas screened from adjacent residential areas to the degree feasible; or Lighting shielded from view and directed downward to minimize impacts on adjacent residential uses.
6. LUP-4.8 Buildings that Engage the Street. The City shall require that buildings be oriented to actively engage and enhance the public realm through techniques such as building orientation, build-to and setback lines, façade articulation, ground-floor transparency, and location of parking.
7. LUP-4.9 Enhanced Pedestrian Environment. The City shall require the design of sidewalks in commercial and mixed-use areas to promote walkability and pedestrian activity, with widths wide enough to provide for free and clear pedestrian use, activation of building frontages with displays, landscaping, and seating areas for cafes and restaurants.
8. LUP-4.11 Shared Parking, Driveways, and Alley Access. The City shall encourage the creation of shared parking areas and shared vehicular driveways for access along arterial corridors to minimize the number of driveways and curb cuts. The City should also encourage the use of adjacent alleys for vehicular access.
9. LUP-4.12 Drive-Through Restaurants. The City shall prohibit new drive-through restaurants within: ½-mile walking distance from the center of an existing light rail station platform or high-frequency transit stop; and ¼-mile walking distance from the center of a proposed light rail station.
10. LUP-4.13 Future-Ready Gas Stations. The City shall prohibit the establishment of new gas stations or the expansion of new fossil fuel infrastructure at existing gas stations unless the

project proponent provides 50kW or greater Direct Current Fast Charger (DCFC) electric vehicle charging stations on site at a ratio of at least 1 new charging station per 1 new gas fuel nozzle.

11. Goal LUP-7 Industrial opportunities in suitable locations to provide employment for Sacramento residents and promote inclusive economic growth in the city.
12. LUP-8.5 Development Adjacent to Freeways and Railroad Corridors. The City shall promote high-quality design of buildings along freeway and railway corridors, including promoting techniques such as the following: Requiring extensive landscaping and trees along the freeway fronting elevation in consultation with City staff, the Sacramento Metropolitan Air Quality Management District, and Caltrans; Establishing a consistent building line, articulating and modulating building elevations and heights, and varying the use of materials and color to create visual interest; and Including design elements that reduce noise and provide for filtering, ventilation, and exhaust of vehicle air emissions.
13. LUP-8.9 People-Friendly Design. The City shall require people-friendly design to be incorporated into buildings and spaces, including elements and features such as the following: Human scale, tree-shaded pedestrian passageways; Resting areas; Seating; Gathering places; and Other measures with demonstrated benefits for health and quality of life.
14. LUP-8.10 Responsiveness to Context. The City shall require building and site design that respects and responds to the local context, including use of local materials and plant species where feasible, responsiveness to Sacramento's climate, and consideration of cultural and historic context of Sacramento's neighborhoods, corridors, and centers.
15. LUP-8.11 Neighborhood and Transitions. The City shall ensure that development standards facilitate transitions between areas that border one another so that neighborhoods and districts maintain their own unique qualities.
16. Goal LUP-11 Create built and natural environments within the city that prioritize, support, promote, and embrace social equity, ecological regeneration, responsible resource stewardship, and human health and well-being.
17. LUP-11.8 Construction Processes. The City shall encourage onsite construction processes that reduce environmental harm and support sustainable methods.
18. M-1.15 Improve Walking Connectivity. The City shall require new subdivisions, new multiunit dwelling developments, and new developments along commercial corridors to include well-lit, tree-shaded walkways where feasible, that provide direct links to the public realm or adjacent public destinations such as transit stops and stations, schools, parks, and shopping centers.
19. M-2.16 Shared Parking. Through the development review process, the City shall encourage project applicants proposing duplex, multi-unit, mixed use, and non-residential projects to first

explore shared-use of existing parking spaces that can be available for dual uses before proposing to construct new parking facilities.

20. M-3.3 Traffic. The City shall support planning and managing traffic from the perspective of the adjacent uses, using traffic management and traffic calming techniques.
21. M-4.7 Integrated Goods Movement. The City shall work to ensure that the goods movement sector is integrated with the rest of the transportation system in such a way that does not endanger the health and safety of residents and other roadway users.
22. Goal EJ-1 Clean air, water, and soil with no segment of the community disproportionately burdened by environment conditions.
23. EJ-2.9 Urban Agriculture in New Development. The City shall promote rooftop gardens, edible gardens, and other sustainable agricultural landscaping alternatives within multi-unit, commercial, and industrial developments.
24. EJ-2.15 Limit Unhealthy Food Establishments. The City shall explore mechanisms to limit unhealthy food establishments, especially in disadvantaged communities (DACs) and historically underserved areas.
25. EJ-2.16 Discourage Unhealthy Uses. The City should discourage the establishment of new drive-through restaurants, alcohol permits for off-site sales, and tobacco sales points near food deserts, schools, and pedestrian priority areas.
26. Goal ERC-9 Climate leadership and bold action to achieve carbon neutrality by 2045, aggressively reduce emissions by 2030, and increase climate resilience communitywide.
27. ERC-9.1 Communitywide GHG Reduction. The City shall implement the Climate Action and Adaptation Plan (CAAP), a qualified greenhouse gas (GHG) reduction plan that meets the requirements of the California Environmental Quality Act (CEQA) Guidelines 15183.5(b), to reduce community and municipal emissions consistent with the state's GHG reduction goals.
28. E-1.2 Business Attraction and Expansion. The City should endeavor to focus business attraction and retention/expansion efforts on emerging industries in the region that demonstrate strong growth potential and pay higher than average wages.
29. Guiding Principle 1: Concentrate new growth within Sacramento's existing footprint to promote a compact development pattern that supports efficient delivery of public services and infrastructure, while protecting surrounding open space lands.
30. Guiding Principle 2: Link new growth with access to high-frequency transit in order to optimize public investments and support an accessible, convenient network that offers a viable alternative to the automobile and promotes public health.



31. Guiding Principle 6: Make Sacramento a model of sustainable living by promoting environmentally conscious, health promoting, and age-friendly design of buildings, parks and infrastructure, as well as by promoting the adaptive reuse of existing buildings and the careful conservation of energy, water, open spaces, trees, and other natural resources.
32. Guiding Principle 7: Take bold action to achieve carbon neutrality by 2045 and become a leading voice in the effort to reduce greenhouse gas emissions and adapt to climate change.
33. Guiding Principle 9: Facilitate the use of innovative approaches, new technologies, and economic development to dramatically reduce per capita energy use, waste, and pollutants.

The EIR must also be revised to remove misleading and erroneous consistency analysis for several items. For example, the EIR concludes the project is consistent with “LUP-1.13 Airport Land Use Compatibility. The City shall work with the Sacramento County Airport System (SCAS) and the Airport Land Use Commission (ALUC) to ensure that new development near the area’s airports is compatible with airport operations, adopted ALUC policies, and applicable Airport Land Use Compatibility Plans,” because “based on the analysis presented throughout this EIR, the proposed project would be compatible with airport operations, adopted ALUC policies, and applicable ALUC Plans.” However, the EIR does not provide any meaningful evidence to support a less than significant finding. The EIR is misleading to the public and decision makers by excluding information regarding the statutorily required review by SACOG ALUC. The proposed project requires a General Plan Amendment to change the land use designation on the project site. Prior to the amendment of a General Plan, the ALUC shall review the plan, ordinance, or regulation for consistency with the ALUCP (PUC Section 21676(b))<sup>20</sup>. While the Project Description of the EIR states that SACOG ALUC review is required, it is excluded from analysis within this section. The EIR must be revised to include a finding of significance as the project does not comply with PUC Section 21676(b) and the above City of Sacramento General Plan policy.

The EIR also concludes that the proposed project is consistent with, “M-2.3 Vehicle Miles Traveled (VMT) as Metric. Consistent with state law, the City shall evaluate transportation California Environmental Quality Act (CEQA) impacts using vehicle miles traveled or other metrics as determined by the City, and shall not rely on automobile delay, as described by level of service or similar measures of vehicular delay as a measure of environmental significance. Local Transportation Analyses (LTA) shall continue to be required when necessary to aid in conditioning project entitlements for needed operational improvements.” The EIR states that because, “the proposed project does not include any retail uses in excess of 50,000 sf. Therefore, the highway commercial uses are considered to be local-serving retail, and consistent with OPR guidance, would result in a less-than-significant impact related to VMT.” This analysis excludes the

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<sup>20</sup> California Airport Planning Land Use Handbook Section 1.3.4. ALUC Review <https://dot.ca.gov/-/media/dot-media/programs/aeronautics/documents/californiaairportlanduseplanninghandbook-all.pdf>

proposed hotel located on the Highway Commercial parcels. The proposed hotel is not a local serving use and is 73,400 square feet. Therefore, this attempted exemption from VMT analysis does not apply and a finding of significance must be made as part of a revised EIR. The EIR continues by stating that, “the on-site industrial uses are anticipated to generate VMT at 128 percent of the regional average, which is above the significance threshold established for the proposed project. Therefore, the proposed project would be required to comply with Mitigation Measure 4.12-3, which requires that the owner/operator of on-site industrial building prepare and implement a VMT Reduction Plan to reduce VMT by at least 22 percent prior to the certificate of occupancy, consistent with the VMT Mitigation Memorandum prepared by the City’s Public Works Department for the proposed project.” However, it is not possible for the City to ensure that MM 4.12-3 will result in reduced VMT by project employees and be implemented continuously, at all times, throughout the life of the project and maintain a VMT reduction to less than significant levels at all times. The efficacy of the proposed mitigation measures and reduction of VMT impacts below the applicable thresholds cannot be assured, and the project’s VMT impact is therefore considered significant and unavoidable. A revised EIR must be prepared to include a finding of significance because there is no possible assurance of the percentage of project employees that would utilize non-automobile or non-single occupant vehicle travel associated with the mitigation measures and mitigation of the project’s VMT impact to less than significant is not feasible.

The EIR also concludes the project is consistent with, “ERC-4.7 Operational Emissions. The City shall require development projects that exceed Sacramento Metropolitan Air Quality Management District (SMAQMD) reactive organic gas (ROG) and nitrogen oxide (NOX) operational thresholds to incorporate design or operational features that reduce emissions equal to 15 percent from the level that would be produced by an unmitigated project,” because, “An AQMP was prepared, as required by Mitigation Measure 4.3-2, and includes all feasible measures to reduce emissions during project operations, including the prohibition of natural gas, participation in a TMA, use of zero-emission forklifts, use of zero emission vehicles in three percent of the heavy-duty vehicle fleet, and the provision of pedestrian and bicycle infrastructure.” This analysis does not provide any information regarding quantity of mitigation and a finding of significance must be made as part of a revised EIR.

The EIR has not provided any information or analysis on the buildout conditions of the City’s 2040 General Plan. Table 2-3: Growth Projections for Sacramento (2040) General Plan<sup>21</sup> within the General Plan EIR states that the City will add 76,612 jobs from 2020-2040. Table 2-4: Citywide Buildout by Concept Area states that the Employment Mixed Use designation will have 1,895

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<sup>21</sup> <https://www.cityofsacramento.gov/content/dam/portal/cdd/Planning/Environmental-Impact-Reports/2040-gpu-and-caap/Sacramento-2040-Project-MEIR-8242023.pdf>

Industrial employees at buildout. Table 2-5: Citywide Buildout Summary states that Industrial employment in the entire City will increase by 8,350 jobs at buildout. Since the project site is not located within the incorporated City limits or its Sphere of Influence, the proposed project therefore represents an increase of 4,000 new employees above these projections. Notably, the proposed project's 4,000 employees will increase the quantity of Industrial employees anticipated for the entirety of the Employment Mixed Use designation by 211%, it will increase the Industrial employment growth for the entire City by 47%, and increase total employment growth for the entire city by 5.2%. The EIR has not provided any analysis regarding the City General Plan buildout scenario including all cumulative development constructed since adoption, approved projects not yet constructed, and "projects in the pipeline." A revised EIR must be prepared to include this analysis in order to provide an adequate and accurate environmental analysis and include a finding of significance as the project will induce growth in the area and exceeds the General Plan buildout scenario for the Employment Mixed-Use designation that was developed for the purpose of avoiding or mitigating an environmental effect (reduce VMT/GHG and improve air quality via compact mixed-use development).

#### **4.12 Transportation**

The EIR sources the Governor's Office of Planning and Research (OPR) 2018 CEQA Guidelines Technical Advisory<sup>22</sup> in its VMT analysis. For the Highway Commercial uses, the EIR states that according to OPR, "the potential for VMT impacts, according to this approach, hinges on whether the project can be considered local-serving or regional. By adding retail opportunities within existing neighborhoods, local-serving retail projects can shorten trips and reduce overall VMT. In contrast, regional destination retail projects would draw customers from larger trade areas, potentially substituting for shorter trips and increasing VMT. The OPR guidance suggests that any retail projects, including stores larger than 50,000 sf, might be considered regional serving retail. The proposed project does not include any retail uses in excess of 50,000 sf. Therefore, the HC-PUD uses are considered to be local-serving retail, and consistent with OPR guidance, would result in a less-than-significant impact related to VMT." However, the purpose of the OPR Technical Advisory document is purely advisory, stating in its introduction:

"The purpose of this document is to provide advice and recommendations, which agencies and other entities may use at their discretion. This document does not alter lead agency discretion in preparing environmental documents subject to CEQA. This document should not be construed as legal advice."

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<sup>22</sup> Governor's Office of Planning and Research Technical Advisory on Evaluating Transportation Impacts in CEQA [https://opr.ca.gov/ceqa/docs/20190122-743\\_Technical\\_Advisory.pdf](https://opr.ca.gov/ceqa/docs/20190122-743_Technical_Advisory.pdf)

The OPR document is not a legal interpretation, court decision, or amendment to the CEQA statute that provides a substitute threshold of significance. Most notably, the EIR's analysis excludes the proposed hotel located on the Highway Commercial parcels. The proposed hotel is not a local serving use and is 73,400 square feet. Therefore, even utilizing the EIR's attempted logic for an exemption from VMT analysis does not apply and a finding of significance must be made as part of a revised EIR.

Although the EIR concludes, "the on-site industrial uses are anticipated to generate VMT at 128 percent of the regional average, which is above the significance threshold established for the proposed project," it has still underreported the quantity of VMT generated by the project's industrial uses. The EIR excludes trips made by medium and heavy duty trucks/trailers from VMT analysis. The VMT analysis relies upon the OPR 2018 CEQA Guidelines Technical Advisory and its statement that, "'vehicle miles traveled' refers to the amount and distance of automobile travel attributable to a project," where automobile refers to passenger vehicles, specifically cars and light trucks," (which is the OPR *interpretation* of PRC Section 15064.3) to conclude that the project will have less than significant impacts. The OPR document is not a legal interpretation, court decision, or amendment to the CEQA statute that clarifies the definition of automobile. The term "automobile" is not defined in the CEQA statute and application of the OPR interpretation is speculative and does not provide an analysis of the "worst-case scenario" for environmental impacts. Widespread public understanding and perception indicates that trucks, including medium/heavy-duty truck/trailer trips associated with the industrial nature of warehouse operations, are automobiles. An EIR must be prepared to include all truck/trailer and operational delivery van activity for quantified VMT analysis. The operational nature of industrial/warehouse uses involves high rates of truck/trailer and delivery van VMT due to traveling from large regional distribution centers to smaller industrial parks and then to their final delivery destinations. Once employees arrive at the industrial buildings for work, they will conduct their jobs by driving truck/trailer/delivery vans across the region as part of the daily operations as a warehouse, which will drastically increase project-generated VMT. The project's truck/trailer/delivery van activity is unable to utilize public transit or active transportation and it is misleading to the public and decision makers to exclude this activity from VMT analysis. A revised EIR must be prepared to reflect a quantified VMT analysis that includes all truck/trailer and delivery van activity to adequately and accurately analyze the potentially significant project transportation impacts.

The EIR provides Mitigation Measure 4.12-3 to mitigate impacts to less than significant levels:

"Prior to the certificate of occupancy for each on-site industrial building, the owner/operator of each building shall be required to prepare and implement a VMT Reduction Plan that includes a sufficient selection of CAPCOA Trip Reduction Programs (T-6 through T-13) to reduce VMT by at least 22 percent, consistent with the VMT Mitigation Memorandum prepared by the City's

Public Works Department for the proposed project (see Appendix Q to the EIR). CAPCOA Trip Reduction Programs T-6 through T-13 include measures such as implementing a commute trip reduction program and/or marketing, providing a rideshare program, implementing a subsidized or discounted transit program, providing end-of-trip bicycle facilities, providing employer-sponsored vanpool, pricing workplace housing, and implementing employee parking cash-out. The VMT Reduction Plan shall be submitted to the City's Department of Public Works and Community Development Department for review and approval."

Notably, the EIR has not provided meaningful evidence to support the conclusion that Mitigation Measure 4.12-3 will reduce VMT by 22%. Mitigation Measure 4.12-3 is unenforceable mitigation in violation of CEQA § 21081.6 (b). It is not possible for the City to ensure that Mitigation Measure 4.12-3 will result in reduced VMT by project employees and be implemented continuously, at all times, throughout the life of the project and maintain a VMT reduction to less than significant levels at all times. The efficacy of the proposed mitigation measures and reduction of VMT impacts below the applicable thresholds cannot be assured, and the project's VMT impact is therefore considered significant and unavoidable. A revised EIR must be prepared to include a finding of significance because there is no possible assurance of the percentage of project employees that would utilize non-automobile or non-single occupant vehicle travel associated with the mitigation measures and mitigation of the project's VMT impact to less than significant is not feasible.

The EIR has not adequately analyzed the project's potential to substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses; or the project's potential to result in inadequate emergency access. There are no exhibits adequately depicting the available maneuvering and queueing space for trucks/trailers at the intersection of the project driveways and the adjacent streets. There are also no exhibits adequately depicting the onsite turning radius available for trucks maneuvering throughout the industrial sites. Notably, even though the Executive Summary states that the EIR provides a project-specific analysis pursuant to CEQA Guidelines Section 15161 for all areas except the non-participating parcels, Figure 3-3: Site Plan does not include any useful information that would be utilized for analysis, such as the location of the truck/trailer loading docks, passenger car parking spaces, and truck/trailer parking spaces. All of these items are necessary to conduct any type of basic analysis regarding geometric design features and emergency access, and the EIR is inadequate as an informational document as it is not possible to ascertain any meaningful analysis based upon the information provided. A revised EIR must be prepared to include a finding of significance due to these significant and unavoidable impacts that have not been analyzed.

Additionally, the EIR has not provided any analysis of the available horizontal and vertical sight distance at the intersection of the project driveways and adjacent streets. Sight distance is the

continuous length of street ahead visible to the driver. At unsignalized intersections, corner sight distance must provide a substantially clear line of sight between the driver of the vehicle waiting on the minor road (driveway) and the driver of an approaching vehicle. A revised EIR must be prepared with a sight distance analysis based on the American Association of State Highway and Transportation Officials (AASHTO) Stopping Sight Distance requirements.

## **6.2 Growth-Inducing Impacts and 6.4 Significant Irreversible Environmental Changes**

The EIR provides erroneous and misleading analysis of the proposed project utilizing uncertain language. The EIR claims that, “because of the industrial and commercial nature of the proposed project, buildout would not directly result in an increase in population or construction of housing.” However, the EIR excludes that the proposed project is outside of the City’s SOI, meaning that it will represent a marked increase above existing growth projections. It is clear that the proposed project has not previously been planned for urban development as it is designated for Agricultural uses by the County of Sacramento and is outside the City of Sacramento’s Sphere of Influence area. Additionally, Figure 3.5: Community Types within the 2020 MTP/SCS identifies the project site as “Land Not Identified for Development in the MTP/SCS Planning Period,” meaning that it was not included in any growth forecasting and the MTP/SCS identifies 0 growth in these areas. Impacts will result from development of the proposed project, including significant and unavoidable cumulatively considerable impacts to Aesthetics, Agricultural Resources, Air Quality, and Greenhouse Gas Emissions. Since the project site was not included for analysis as an employment generating use by the City, County, or SACOG, it represents an increase in population and employment growth that was not accounted for by any agency. The EIR must be revised to include a finding of significance due to this significant and unavoidable impact.

The EIR continues by stating that, “While construction of the proposed project would result in a *limited* increase in construction employment opportunities, construction would be temporary, and jobs would *likely* be filled by the *local* employee base.” The EIR has not provided any demographic information regarding the “local” employee base, and the geographic boundaries of the “local” employee base are undefined. There is no information regarding the available construction workforce and the EIR has not provided any meaningful evidence to support the conclusion the project will not induce growth.

The EIR also states that, “Although development of the proposed project could generate a total of approximately 4,000 employees, new employees would *likely* be drawn from current residents *in the area*. According to the City’s population projections, as presented in Table 4.9-4, City of Sacramento Population Growth Projections, in Chapter 4.9, Land Use and Planning/Population and Housing, of this EIR, the population of the City of Sacramento is anticipated to increase from 2020 to 2030 by 111,515. Conservatively estimating that all permanent positions associated with the project would be filled by new residents to the *Sacramento region* and assuming that the



proposed project would be fully built out and operating at full capacity by 2030, the project's contribution to the overall population increase by 2030 would be approximately 0.77 percent. Thus, the increase in jobs would be *relatively small* compared to the City's existing and anticipated population levels. As such, the proposed project would not result in a substantial increase in permanent population and a demand for housing in the vicinity of the project site." It must be noted that the project site is not within the incorporated City limits or the City's Sphere of Influence and therefore was not accounted for within the 111,515 resident total, and therefore represents an increase of 4,000 new residents above the 2035 projection. The EIR has not provided any relevant analysis regarding the City's employment projections. Since the project site was not included for analysis as an employment generating use by the City, County, or SACOG, it represents an increase in population and employment growth that was not accounted for by any agency. The EIR must be revised to include a finding of significance due to this significant and unavoidable impact.

Sacramento Council of Governments (SACOG) adopted the 2020 Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS) on November 18, 2019<sup>23</sup>. Figure 3.5: Community Types within the 2020 MTP/SCS identifies the project site as "Land Not Identified for Development in the MTP/SCS Planning Period," meaning that it was not included in any growth forecasting and the MTP/SCS identifies 0 growth in these areas. The MTP/SCS notes that the Established Communities in the SACOG region will add 146,053 jobs between 2016 - 2040 (Figure 3.5 Community Types and Table 3.2 Summary of Expected Housing and Employment Growth by Community Type). Utilizing the EIR's calculation of 4,000 employees, the project represents a 2.7% increase above the employment growth projections from 2016 - 2040 within all of SACOG's Established Communities. A single project accounting for this amount of the projected employment and/or population over 26 years represents a significant amount of growth. A revised EIR must be prepared to include this analysis, and also provide a cumulative analysis discussion of projects approved since 2016 and projects "in the pipeline" within Established Communities in the SACOG region to determine if the project will exceed SACOG's employment growth forecast for the Established Communities. Additionally, the revised EIR must also provide demographic and geographic information on the location of qualified workers to fill these positions in order to provide an accurate environmental analysis.

The EIR has not provided any information or analysis on the buildout conditions of the City's 2040 General Plan. Table 2-3: Growth Projections for Sacramento (2040) General Plan<sup>24</sup> within the General Plan EIR states that the City will add 76,612 jobs from 2020-2040. Table 2-4: Citywide Buildout by Concept Area states that the Employment Mixed Use designation will have 1,895

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<sup>23</sup> SACOG 2020 MTP/SCS [https://www.sacog.org/sites/main/files/file-attachments/2020\\_mtp-scs.pdf?1580330993](https://www.sacog.org/sites/main/files/file-attachments/2020_mtp-scs.pdf?1580330993)

<sup>24</sup> <https://www.cityofsacramento.gov/content/dam/portal/cdd/Planning/Environmental-Impact-Reports/2040-gpu-and-caap/Sacramento-2040-Project-MEIR-8242023.pdf>

Industrial employees at buildout. Table 2-5: Citywide Buildout Summary states that Industrial employment in the entire City will increase by 8,350 jobs at buildout. Since the project site is not located within the incorporated City limits or its Sphere of Influence, the proposed project therefore represents an increase of 4,000 new employees above these projections. Notably, the proposed project's 4,000 employees will increase the quantity of Industrial employees anticipated for the entirety of the Employment Mixed Use designation by 211%, it will increase the Industrial employment growth for the entire City by 47%, and increase total employment growth for the entire city by 5.2%. The EIR has not provided any analysis regarding the City General Plan buildout scenario including all cumulative development constructed since adoption, approved projects not yet constructed, and "projects in the pipeline." A revised EIR must be prepared to include this analysis in order to provide an adequate and accurate environmental analysis and include a finding of significance as the project will induce growth in the area and exceeds the General Plan buildout scenario for the Employment Mixed-Use designation that was developed for the purpose of avoiding or mitigating an environmental effect (reduce VMT/GHG and improve air quality via compact mixed-use development).

The EIR concludes that, "the project would not be anticipated to eliminate any obstacles to population growth," because "the foregoing entitlements would only apply to the project site and would not allow for further expansion of the City boundaries or additional development *beyond what is proposed.*" The EIR has excluded for discussion for the precedence setting action that approval of the required Sphere of Influence Amendment, General Plan Amendment, and Rezoning set for future changes in the area. The EIR must be revised to include a finding of significance as the required SIO Amendment/GPA/Rezoning to implement the project will result in significant and unavoidable cumulatively considerable impacts to Aesthetics, Agricultural Resources, Air Quality, and Greenhouse Gas Emissions and approval of the proposed project will set precedent for approval of other SOI Amendments/GPAs and projects with SU impacts that require changes in land use designations. This is a precedent-setting action that will encourage and facilitate other activities that could significantly affect the environment.

## **7.0 Alternatives**

The EIR is required to evaluate a reasonable range of alternatives to the proposed project which will avoid or substantially lessen any of the significant effects of the project (CEQA § 15126.6.) The alternatives chosen for analysis include the CEQA required "No Project/No Build" alternative and only two others - 20 Percent Electric Fleet Alternative and Reduced Footprint Alternative. The EIR does not evaluate a reasonable range of alternatives as only two alternatives beyond the required No Project alternative is analyzed. The EIR must be revised to include analysis of a reasonable range of alternatives and foster informed decision making (CEQA § 15126.6). This could include alternatives such as development of the site with a project that reduces the significant and unavoidable Aesthetics, Agricultural Resources, Air Quality, and GHG impacts to less than

Scott Johnson

May 27, 2025

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significant levels and a mixed-use project that provides affordable housing and local-serving commercial uses that may reduce VMT, GHG emissions, and improve Air Quality.

**Conclusion**

For the foregoing reasons, GSEJA believes the DEIR/FEIR and Response to Comments are flawed and a revised EIR must be prepared for the proposed project and circulated for public review. Golden State Environmental Justice Alliance requests to be added to the public interest list regarding any subsequent environmental documents, public notices, public hearings, and notices of determination for this project. Send all communications to Golden State Environmental Justice Alliance P.O. Box 79222 Corona, CA 92877.

Sincerely,

A handwritten signature in black ink, appearing to be 'Gary Ho', with a stylized, overlapping loop structure.

Gary Ho

Blum, Collins & Ho, LLP

## Saphire Xiong

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**From:** SXiong@cityofsacramento.org  
**Subject:** FW: 06/26/25 CDD public hearing - comments

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**From:** Patricia Pfautch <[ppfautch@gmail.com](mailto:ppfautch@gmail.com)>  
**Sent:** Wednesday, June 18, 2025 3:16 PM  
**To:** clerk <[clerk@cityofsacramento.org](mailto:clerk@cityofsacramento.org)>  
**Cc:** Deja Harris <[dnharris@cityofsacramento.org](mailto:dnharris@cityofsacramento.org)>  
**Subject:** 06/26/25 CDD public hearing - comments

Good Afternoon,

I attempted to access the City of Sacramento's official website for public hearings. I did not see that the 6/26 Community Development Department Hearing (5:30pm) listed under the upcoming hearings. Next, I called the office of the City Clerk at 916-808-7200 during normal business hours and was routed to 311 where I spoke with someone that suggested that I contact the City Clerk via email to find out when the information would be available. Hence the reason for this email, as well as the ability to voice my concerns. Reading further into the notice of public hearing, it appears that this may become a moot point as long as the hearing agenda, eComments and Addendum (mitigated negative declaration) become available as stated by COB on Friday, June 20, 2025.

As I will not be able to attend in person due to my work schedule, I wanted to provide written comments online relative to "Independence in Natomas (P22-047)" for rezoning of single/duplex dwellings (R-1A-PUD) and Creekside PUD to Multi-unit Dwelling (R-2A-PUD) zoning. I live within the area that is likely to be impacted (on Bannock Glen Place), so more than a year ago I called the developer and gave them some of my concerns relative to traffic congestion, parking, traffic within the neighborhoods and school zone (Harbour Cove Way, North Park Drive, East Commerce Way which is currently a single lane from Ottumwa Drive to North Park Drive). I would like to see the Environmental addendum that was adopted to "mitigate negative declaration" to confirm that my concerns have been addressed. Note: if the "counters" on Harbour Cove Way are to gather true usage data, then this should have been done during the school year when the traffic is heavier as well as getting information from the section on East Commerce Way that is a single lane and can often cause backups of 15-20 cars at the stop sign at Ottumwa Drive. I know that when I was commuting during the school year, I would avoid that area and the school, driving through the Creekside neighborhoods in an attempt to miss the high volume of traffic. Also, I'm concerned about parking (residents or guests) that may spill out onto the side streets of Kankakee Drive and Harbour Cove Way. With parking on both sides of the street on Harbour Cove Way, there isn't enough room for two cars to pass one another easily or safely.

I apologize for the lengthy list of concerns within the paragraph above, however, I wanted to make sure that I was able to state my concerns as I am not sure that I will be able to view the hearing and have the ability to review the agenda and to add eComments based upon the timing of this information being made available. Thank you.

Patricia Pfautch  
916-798-8959  
8 Bannock Glen Pl.

Sacramento, CA 95835