



SACRAMENTO LOCAL AGENCY
FORMATION COMMISSION

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City Planning Commission
Airport South Industrial Project
June 26, 2025
Judith Lamare Ph.D.
Friends of the Swainson's Hawk

Natomas Rules Are Different

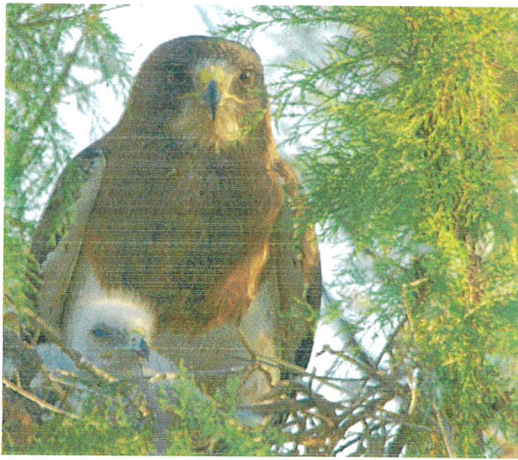
"Thus, CITY and SUTTER further agree that in the event this future urban development should occur, prior to approval of any related rezoning or prezoning, such future urban development

shall trigger a reevaluation of the Plan and Permits, a new effects analysis, potential amendments and/or revisions to the Plan and Permits, a separate conservation strategy and issuance of Incidental Take Permits to the permittee for that additional development,

and/or possible suspension or revocation of CITY's or SUTTER's Permits in the event the CITY or SUTTER violate such limitations."

(NBHCP Implementation Agreement, § 3.1.1(b), emphasis added.)

By the terms of the NBHCP Implementation Agreement, which the City signed, this project approval would have a very significant impact on the NBHCP, NBC and its Conservation strategy. The EIR claims the impact is less than significant and does not require wildlife permits be obtained. The EIR is deficient. **Please do not recommend certification of the EIR.**



City Planning Commission 6/26/25
Comments by
Judith Lamare Ph.D.
Friends of the Swainson's Hawk

Why We Care

- Swainson's Hawks nest adjacent to this property, usually along Bayou.

Those nest sites will be lost, adding to the decline of the population in Natomas documented by wildlife biologist Smallwood in the FEIR.

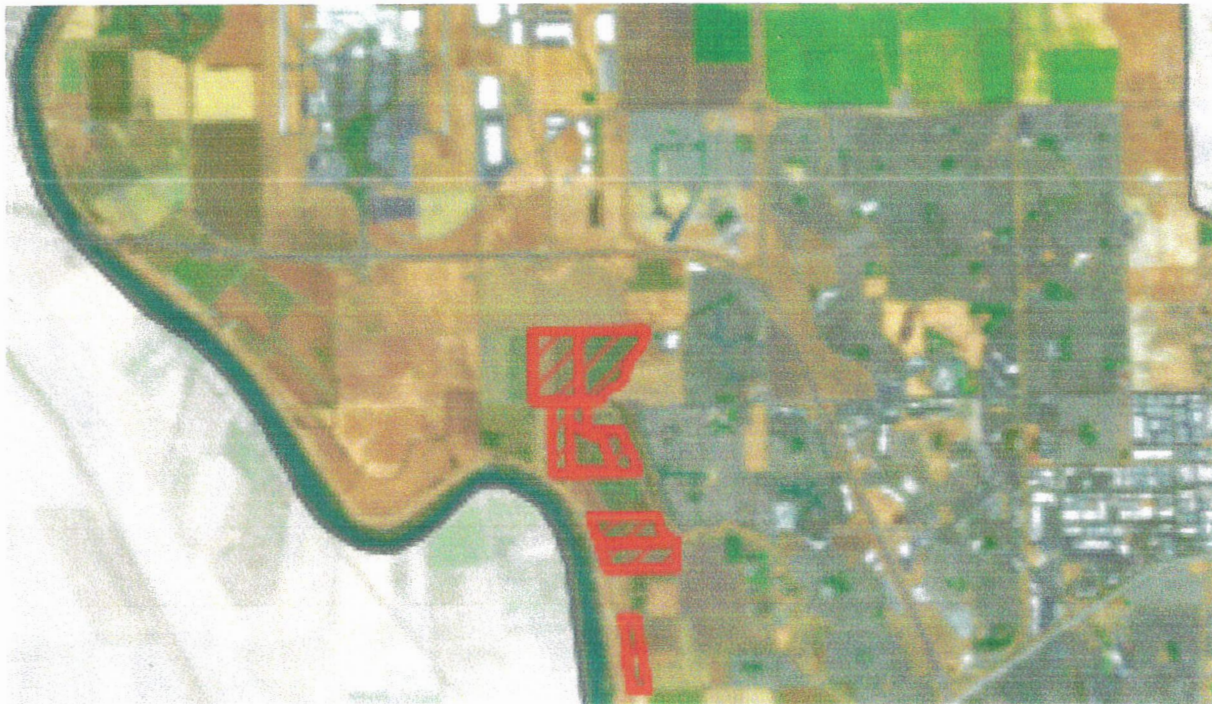
- The NBHCP Conservation Strategy depends upon the maintenance of agriculture in the Natomas Basin not permitted for development. The project site is one of those areas not permitted for development.

- The Swainson's Hawk population in Natomas has been declining, indicating that not enough forage is available now to maintain the population. (Smallwood, letter to LAFCo 4/2/25).



City of Sacramento Planning
Commission 6/26/25
Comments on Airport South IP
Judith Lamare Ph.D.
Friends of the Swainson's Hawk

- The Natomas Basin Conservancy manages 206 acres adjacent and south of the ASIP project for permanent wildlife habitat. An additional 234 NBC owned acres to the south add to a total of 440 acres in the Fisherman's Lake preserve area. There are additional SAFCA mitigation properties in this area. It is a critical preserve area for Swainson's Hawk. The EIR doesn't consider the impacts of the project on performance of these preserve areas as mitigation lands once the project is underway. This map shows permanently preserved mitigation in red. Project is immediately to the north of the northmost preserve.



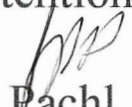
6/26/2025

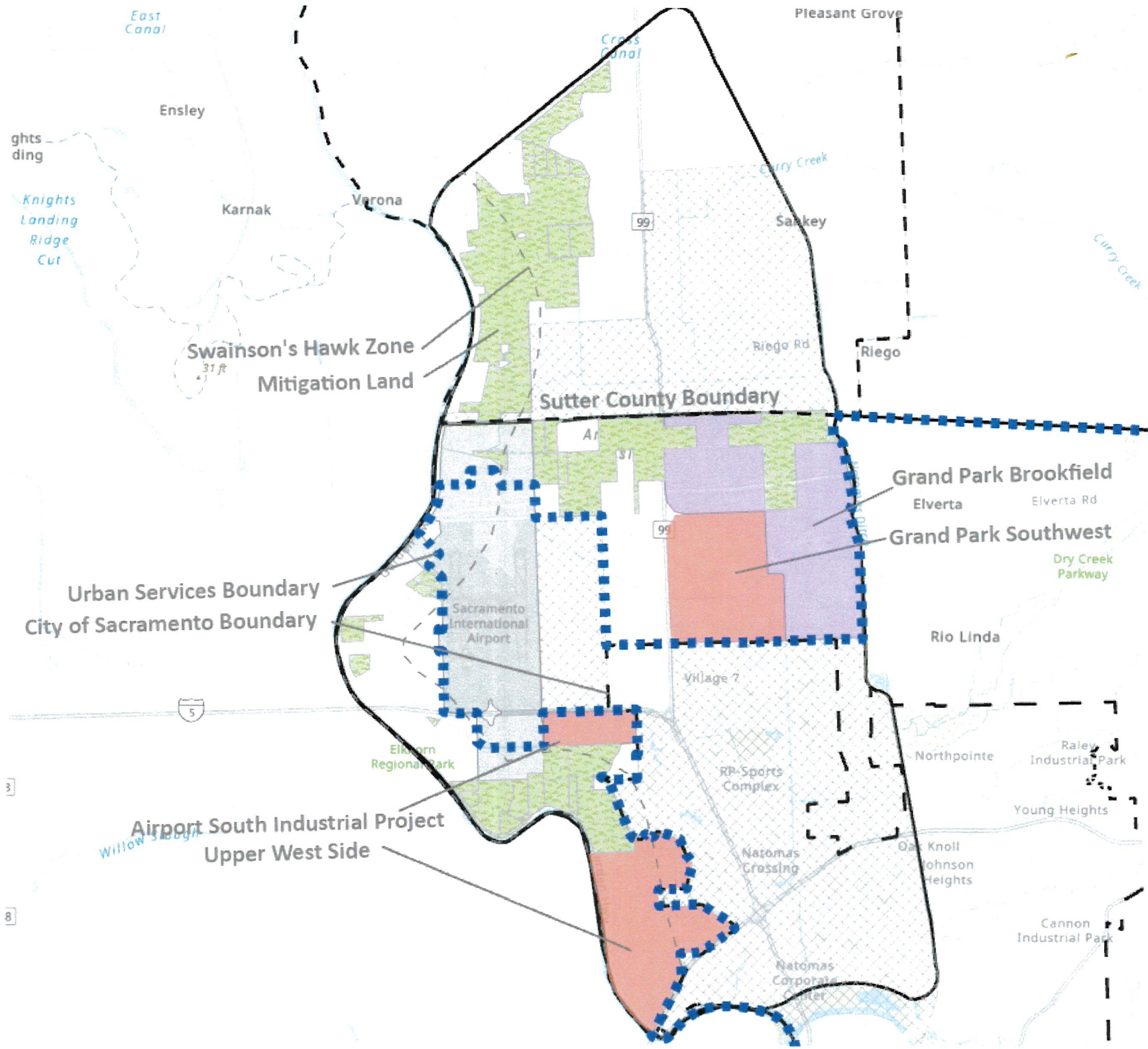
I am Jim Pachl, representing Friends of the Swainson's Hawk. Today I will talk about waterfowl versus airplanes. The Sacramento Airport and the nearby Project site are located beneath the Pacific Flyway. During the fall and winter millions of waterfowl pass overhead. Aircraft using the airport sometimes collide with geese or ducks, which can disable a jet engine and cause a crash. Sacto Airport has one of the highest bird strike rates in the nation.

Waterfowl are attracted to areas of open water, such as the Project's drainage detention basins, which start 4600 feet south of the runway. The great majority of airplane departures are southward. The preliminary drainage plan by Wood Rogers engineers calculates that the project will need 96 acres of detention basins on project site, approx. 10 feet deep. (DEIR Appendix I Preliminary Drainage Study).

The FAA correctly regards detention basins within 10,000 feet of an airport as a hazard by attracting waterfowl into the path of airplanes using the airport. The Project site is the bottom of former Upper American Lake and is within the 100-year floodplain, 9 to 10 feet above sea level. Water flows onto the site from all directions and pools on site during wet weather. Groundwater may intrude into the detention basins at elevations varying 3 to 10 feet above sea level.

The Project's 96 acres of detention basins so close to the end of the runways will increase the likelihood of a tragedy caused by waterfowl collision. This Project can easily be located at a less risky location elsewhere, preferably east of Natomas Basin safely distant from the Airport and where the need for detention basins is much less.

Respectfully submitted,  James P. Pachl, 8867 Bluff Lane, Fair Oaks CA. 95628. <jamesppachl@gmail.com>



June 26, 2025

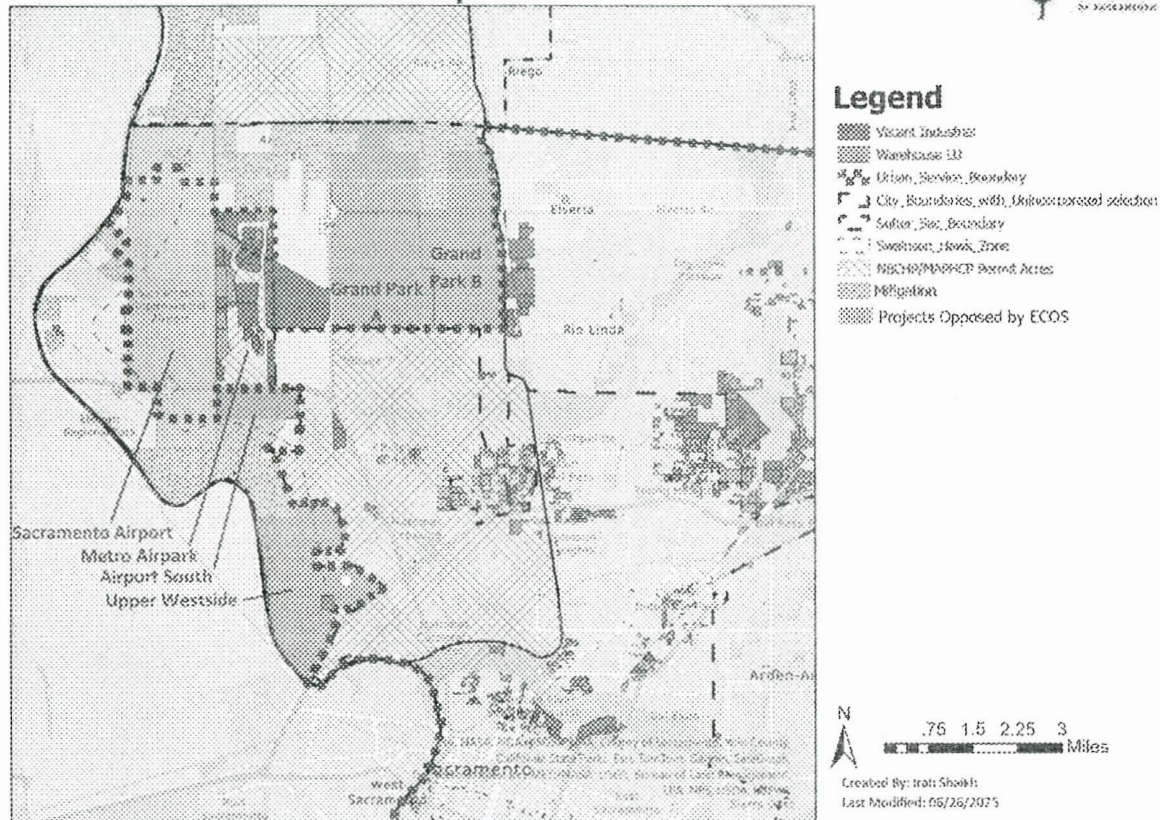


TO: City Council Planning Commissioners

RE: Meeting June 26, 2025, Airport South Industrial Annexation (P21-017) File ID: 2025-01031

Airport South Industrial Project Is Not Necessary and Not Justifiable When Existing Industrial Land Already Meets the Region's Needs

Warehousing and Vacant Industrial Land Surrounding Sacramento International Airport



The City Council is being asked to approve this project based on the claim that it meets economic development and job creation needs. But if there are **already multiple industrial parcels zoned and ready for warehouse development nearby**, then:

- **There is no unmet demand** justifying the conversion of farmland or protected areas.
- **There is no need for annexation**, rezoning, or General Plan amendments.
- **There is no basis for a Statement of Overriding Considerations**, because the public benefit is neither unique nor necessary.

The Council's job is to evaluate whether this specific project **is the best, most responsible way** to meet the city's needs. If better-suited land is available, this project **fails the threshold for approval**.

Sincerely,
Irah Shaikh
Policy Staff

Warehousing and Vacant Industrial Land Surrounding Sacramento International Airport

