



COMMUNITY DEVELOPMENT  
DEPARTMENT

CITY OF SACRAMENTO  
CALIFORNIA

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SACRAMENTO, CA  
95811-0218

January 26, 2011

Delta Stewardship Council Members  
P. Joseph Grindstaff, Executive Officer  
650 Capitol Mall, Fifth Floor  
Sacramento, CA 95814

**Comments to Delta Stewardship Council – Notice of Preparation, Draft Environmental Impact Report for the Delta Plan**

Dear Mr. Grindstaff:

The City of Sacramento appreciates the opportunity to comment on the Notice of Preparation for the Draft Environmental Impact Report that will be prepared to evaluate the environmental impacts of the Delta Stewardship Council's (DSC) Delta Plan. The City is especially interested in any aspects of the plan that may establish regulatory control outside the boundaries of the statutorily defined primary zone of the Delta. Specifically, the City is interested in aspects of the plan that may affect land uses and development permitting in the City. To assist the DSC in its development of the plan, we offer the following comments:

1. The City desires to implement its Sacramento 2030 General Plan, adopted on March 3, 2009. The general plan calls for smart growth development patterns, with the majority of planned development occurring in existing urbanized infill areas.
2. The 2030 General Plan is consistent with the Sacramento Area Council of Governments' (SACOG) Blueprint regional plan and will help achieve the goals of AB 32 and SB 375 relative to reducing greenhouse gas emissions by guiding growth toward existing urban infill areas that are served by public transit and located within walking distance of a mix of uses, thereby reducing automobile usage and associated vehicle miles traveled. Development consistent with the Blueprint has the added benefit of protecting agriculture and open space through an emphasis on urban infill development.
3. Infill development faces many challenges due to inadequate infrastructure, fragmented parcel ownership, high land costs and potential community opposition. This is why development has traditionally followed the path of least resistance into farmland and open space areas at the urban edge. Such "greenfield" areas allow for large-scale master planned communities on inexpensive land, guided by single developers that have economies of scale, making infrastructure development easier to finance while also having fewer neighbors who might object to new development during the planning process. Since extensive greenfield

development can conflict with the State's goals relative to the Delta by consuming farmland, reducing natural habitat, increasing water use and exposing more people to flood risks, infill development should be encouraged by the DSC and Delta Plan as a viable way to accommodate regional growth in a sustainable manner.

4. The City is concerned that the Delta Plan may deem development projects in the City to be "covered actions" that would require consistency findings with the Delta Plan. Because such findings could be appealed to the DSC, projects that are otherwise consistent with the general plan and widely-accepted smart growth principles could be subjected to greatly increased uncertainty, adding time and costs to the planning process. Adding more requirements to already-burdened infill development may make attainment of the City's (and State's) sustainable development goals infeasible.
5. An example of a project of concern is the Delta Shores Planned Unit Development project, which has received some of the required planning approvals such as land use and zoning approval, but will require additional discretionary planning approvals in the future, such as tentative subdivision maps, use permits and site plan review. While the master plan for the project has been approved, subsequent approvals could be deemed "covered actions" which could put the entire project's status in question. Projects that are consistent with existing city general plans, zoning and other master planning documents such as specific plans or planned unit developments should not have their planning entitlements diminished by provisions of the Delta Plan.
6. State policy should encourage desirable development patterns by reducing regulatory barriers. Regulatory scrutiny should be focused on the highest-risk projects in the most environmentally sensitive areas, while projects located in already-urbanized communities should not be subjected to additional layers of review. The Delta Plan should recognize this principle and clearly state that projects located within existing city limits and consistent with existing general plans are not considered "covered actions".

The City appreciates this opportunity to comment on this extremely important undertaking. We hereby request to be notified of any actions taken on the Delta Plan and its associated environmental review and to receive notice of relevant public meetings. The City is willing to discuss any of the concerns expressed in this letter and we look forward to working with the DSC to develop a Delta Plan that will further all of the State's planning and environmental goals. Please contact Tom Pace at (916) 808-6848 or [tpace@cityofsacramento.org](mailto:tpace@cityofsacramento.org) if you have any questions regarding this matter.

Sincerely,



DAVID KWONG  
Planning Director

- c: John Dangberg, Assistant City Manager  
Max Fernandez, Community Development Director  
Dave Brent, Department of Utilities