



County of Sacramento

July 31, 2008

Mr. Tom Pace
Long-Range Planning Manager
City of Sacramento, Planning Department
New City Hall
915 I Street, 3rd Floor
Sacramento, CA 95814
generalplan@sacgp.org

Subject: Review of the City of Sacramento General Plan

Dear Mr. Pace:

Thank you for the opportunity to comment on the City of Sacramento General Plan. The Sacramento County Airport System (County Airport System) is pleased that the City of Sacramento is committed to supporting the region's airports which surround the City. The County Airport System has the following comments summarized below.

Page 2-27 – 2-352 LU 3 Land Use & Urban Form Designations and Development Standards

The County Airport System recommends that development standards for any proposed development within 10 miles of an airport require consistency with Federal Aviation Regulation Part 77 pertaining to protection of airspace and notice of proposed construction near airports and FAA Advisory Circular AC 150/5200-33B that provides guidance designed to limit the risk associated with wildlife near airports that is hazardous to aircraft. In many cases development standards can impact the degree to which specific project may adversely impact either airport operations based on incompatible land use or attraction of wildlife hazardous to aircraft. County Airport System staff is available to assist in project review for such considerations.

Page 2-31, Figure LU 1 General Plan Land Use & Urban Form Diagram

The footprint of Sacramento International Airport (SMF) is incorrectly shown on the diagram. The County Airport System owns approximately 6,000 acres in the Natomas Basin. The property shown reflects roughly one third of the total property owned. The property extends south to the Sacramento River and north to the Sutter County line. A property map is enclosed, which also includes several parcels west of current airport property identified for acquisition to support future airport expansion.

- The Natomas Joint Vision Study Area clearly states that the County will maintain management by the County Airport System (Page 12, Draft Preliminary Concept 2).
- The MOU between the City and County creating the Natomas Joint Vision Study states “The County will preserve its interest in the planning and development of Sacramento International Airport” (Page 2, Future Growth 3)
- As the majority of Natomas Joint Vision Study Area is located within and residential land uses would be subject to conditions of the Sacramento International Airport Planning Policy Area, we recommend that a commitment to support the same conditions be included after such areas were annexed. Copies of the Airport Planning Policy Areas for Sacramento International, Sacramento Mather, and McClellan Airfield are also enclosed.

Page 2-123, Illustration of Sacramento’s Special Study Areas and Planed Development

Please see comments for Page 2-31. The entire SMF footprint should be excluded from this illustration.

Page 2-124, Special Study Areas (first paragraph)

The paragraph states that “the Special Study Areas designation is applied to five potential annexation areas that may become part of the City in the future...” Again, please see the comments for page 2-31. All airport lands should be excluded from this statement.

Page 2-203, Aviation Policies

The County Airport System appreciates the City’s support for aviation services. In many other sections of the General Plan policies address airport compatibility and consistency with airport land use commission policies and the requirement of deed notices. For consistency, the City’s polices on airport land use commission policies, airport compatibility and the requirement of deed notices should also be listed as policies under the aviation policies section as well.

LU 8.1.14, Airport Compatibility and LU 8.1.15 Consistency with Airport Land Use Commission Policies

The County Airport System greatly appreciates the City’s commitment to ensure airport compatible development near the area’s airports, but feels these policies would be strengthened by directly relating them to ensuring consistency with the current Airport Land Use Compatibility Plan for each airport.

LU 8.1.16 Deed Notice

The County Airport System appreciates the City’s commitment to ensure disclosure, but feels it is more effective to secure avigation easements rather than deed notices. If not for existing City areas within airport defined overflight areas, the County Airport System recommends that the granting of avigation easements to the County be required on any lands planned for annexation by the City and to be used for residential land uses that would currently be subject to such conditions under the provisions of the existing County Airport Planning Policy Areas ordinances for Sacramento International, Sacramento Mather, and McClellan Airfield airports.

EC 3.2.1 Land Use Compatibility

The County Airport System recommends that the limitation on residential development be selected to be consistent with current County policy prohibiting residential land use within the 60

CNEL airport noise contour the 65 CNEL airport noise contour. The County policy was established based on guidance provided by the 2002 California Airport Land Use Planning Handbook which states that

- Noise exposure of 65 CNEL is not an appropriate criterion for new residential development around most airports, especially those which are primarily general aviation facilities. Noise exposure of 60 CNEL or in some locations, even 55 CNEL may be more appropriate for land use planning purposes.
- In addressing noise concerns, consideration should be given to the impacts of aircraft overflights in locations beyond the normally mapped noise contours.

EC 3.2.3 Cooperative Noise Reduction

The County Airport System welcomes the commitment of the City to collaborate on aircraft overflight noise issues in a manner consistent with County policies as well as Federal and State regulations concerning noise, and airports, aircraft, and airspace management and operations.

NS.LU 1.29 McClellan Heights Parker Homes Plan Area

The County Airport System appreciates the conditions incorporating sound insulation and disclosure, but feels compelled to point out that no mention is made as to the proposed residential development being:

- 1) An incompatible land use based on the current McClellan Airport Compatible Land Use Plan;
- 2) Inconsistent with the provisions of the County's McClellan Airport Planning Policy Area (APPA) which prohibits new residential land uses inside the 60 CNEL noise contour and requires insulation, disclosure and the granting to the County of an aviation easement for new residential land uses beyond the 60 CNEL but still within the APPA boundary.

While the County recognizes that the City's prior action to override the Airport Land Use Commission's determination of incompatibility for the proposed land uses was consistent with State Public Utilities Code section 21670, and that the County APPA policies are only applicable to unincorporated areas of Sacramento County, many of the same noise and safety concerns originally expressed to the City in our July 13, 2007 comment letter (enclosed) on the McClellan Heights Parker Homes Land Use Infrastructure Plan (M03-190) Draft EIR are still valid and merit reconsideration as part of the current General Plan update.

SA.M 1.11 and SA M.1.12 Sacramento Executive Airport

The County Airport System welcomes the City's participation in the Sacramento Executive Airport Master Planning process currently underway and appreciates the support for the plan's policies and procedures designed to keep Sacramento Executive a valued asset to both the City and communities that surround it and the County Airport System.

SN.PHS 1.2 Localized Noise Assessments

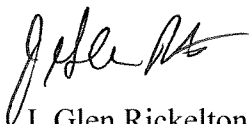
The County Airport System appreciates the city's commitment to provide notification for residential entitlements west of I-5 are submitted. We recommend that that commitment be extended for all future entitlements contemplated for areas ultimately annexed by the City located in the Natomas Joint Vision Study Area.

SN.PHS 1.3 Airport Overflight Notice

The County Airport System supports the City's intention to ensure continuing disclosure of aircraft overflight impacts in south Natomas, and recommends that it be extended to include North Natomas as well if not already subject to a similar condition as varying weather patterns often result in aircraft overflights occurring throughout the area.

If you have any questions you can contact me at (916) 874-0482 or rickeltong@saccounty.net

Sincerely,



J. Glen Rickelton
Airport Manager, Planning and Environment
Sacramento County Airport System

Enclosures (3)

C: Lisa Stanton, Sacramento County Airport System
Kelly Moulton, Sacramento County Airport System
Bree Taylor, Sacramento County Airport System