



August 11, 2025

Sacramento City Council  
City of Sacramento  
New City Hall  
915 I Street, Fifth Floor  
Sacramento, CA 95814

*Via City Comment Portal Only*

Dear Council Members:

**UPPER WEST SIDE PROJECT (UWSP) – AUG 12 MEETING, ITEM 8**

We appreciate the opportunity to comment on the City's proposed resolution opposing the subject project. We support adoption of the resolution.

We oppose UWSP for the following reasons;

**UWSP is Unnecessary.** Since 1969 the County has approved 13 large housing projects. This is far more than there is market demand for, and not one of these projects has yet completed building-out. Their available remaining capacity, with County-estimated available infill capacity, is 92,000 dwelling units - equivalent to 141 years of growth at recent growth rates. The County's general plan's time horizon is only 25 years. We need more housing, but since County approvals are obviously not what's limiting construction, approving UWSP wouldn't bring a single additional home to market.

**UWSP Would Violate both of the County's Current and "Ultimate" Growth Boundaries.** In 1993 the County established the County's Urban Policy Area (UPA) and Urban Services Boundary (USB), and in 2011 re-approved them. Per the County's general plan, they "are *the backbone of Sacramento County's urban planning philosophy...intended to protect the County's natural resources from urban encroachment, as well as to limit costly sprawling development...the USB is intended to be a permanent boundary...not subject to modification except under extraordinary circumstances*" (emphasis added). The USB, never violated, has served its purpose for thirty years. Breaching it, and adopting the numerous proposed County-wide general plan amendments, would open the floodgates to sprawl everywhere in the County. Like UWSP, each past sprawl project has claimed extraordinary features. UWSP differs chiefly in its speculative ambition.

**UWSP Would Increase Climate Change.** Sprawl historically increases auto traffic, already our largest greenhouse gas source. Project proponents claim that UWSP will not, because at full build-out it will include enough urban mass and commercial development to support local services, jobs, and transit. But, like the 13 competing projects before it, this project cannot build-out in the foreseeable future. Until it does, generations from now, its induced auto emissions will not be mitigated -if then (see below re conflicts with general plan). SACOG, using realistic projections of County growth has determined that UWSP would increase the County's per capita GHG emissions, contrary to State goals.

**UWSP Conflicts with the County General Plan.** The County has dismissed infill growth as an alternative to this sprawl project, even though the general plan (consistent with State guidance) states that infill development has “priority” over sprawl. Moreover, UWSP cannot rely on (“tier from”) the general plan policies claimed to allow it, because those policies were adopted in 2011 without any review in the 2010 environmental document..

**UWSP Would Harm Agriculture and Endangered Species.** The project would destroy working agricultural fields; and lands protected by the North Natomas Habitat Protection Plan, set aside decades ago as mitigation for urbanization of South Natomas wetlands. Preservation of existing habitat elsewhere will not compensate for that loss, nor will it compensate for “farm to fork” lands, and open space treasured by City residents.

**UWSP Would Increase Traffic Dangers and Burden Taxpayers.** The main access to UWSP would be Garden Highway, an already dangerously over-burdened rural road, difficult or impossible to widen because of its location between homes and levees. Wherever the traffic from UWSP would be routed, the cost of maintaining necessary road improvements subject to wear of traffic from thousands of new homes, will fall on all taxpayers, including City residents. The County currently has bad roads and an unfunded maintenance backlog of nearly *\$1.4 billion*, compounding as maintenance is delayed. The County’s last three approved sprawl projects show an *annual* Transportation Fund deficit totaling over \$900,000. Supervisors have not proposed a way to get out of this financial hole – let’s not keep digging it deeper for this unneeded, harmful project.

Thank you very much for considering our comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Oscar Balaguer". The signature is fluid and cursive, with a large, stylized "B" and "G".

Oscar Balaguer, Chair  
350 Sacramento CAP Team

cc: Internal Distributions  
Liaisons: ECOS, SCC, SCL, Sierra Club