

**Taylor. Todd**

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**From:** Kathy Les <kathy.les321@gmail.com>  
**Sent:** Thursday, March 11, 2021 4:57 PM  
**To:** PER. climateactionplan  
**Subject:** Electrify Landscape Equipment

**EXTERNAL EMAIL:** If unknown sender, **do not** click links/attachments.

I am writing to whole-heartedly support measures proposed in the county Climate Action Plan. I especially encourage rapid adoption of the measure to create an incentive program to trade in gas-powered landscaping equipment for electric and zero-emission versions.

Everyday local residents are assaulted with noise and air pollution from gas powered lawn equipment, mainly that used by professional landscapers. Polluted lawn equipment is damaging to the health of the workers who use it and to the residents in the vicinity of its use. The California Air Resources Board projected gas lawn equipment would be more polluting than cars by 2020.

Please move forward on this important measure!

Kathy Les  
Curtis Park, Sacramento

- Low and Zero Emissions Vehicles and Equipment: Support electrification and alternative fuels in on- and off-road vehicles and equipment, as well as fuel efficiency measures that would reduce the amount of gasoline and diesel fuel consumed.

#### **MEASURE GHG-09: ELECTRIC LANDSCAPING EQUIPMENT**

**Measure:** The County will work with SMAQMD to establish an incentive program to trade in fossil fuel-powered landscaping equipment with electric versions.

**Implementation:** Create a drop-off point for fossil-fuel powered landscaping equipment at the North Area Recovery Station Household Hazardous Waste Facility, and other appropriate County-operated facilities.

**Responsibility:** DWMR and SM

**Timeframe:** Near-term

**GHG Reduction Potential:** Not quantified.

**Sector:** Off-Road Vehicles

**Target Indicator:** Track the number of vouchers issued for the exchange of fossil-fuel powered lawnmowers, leaf blowers, and weed eaters.

**Taylor. Todd**

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**From:** Ron Brasel <rbrasel2@gmail.com>  
**Sent:** Thursday, March 11, 2021 6:29 PM  
**To:** PER. climateactionplan  
**Subject:** Charging stations for micromobility

**EXTERNAL EMAIL:** If unknown sender, **do not** click links/attachments.

Ebikes and scooters have exploded the micromobility sector in Transportation during the pandemic as an alternative to carpooling and public transportation. Charging stations will be an integral part of the infrastructure for continued growth. Public/private partnerships are needed to help achieve municipalities goals.

**Taylor. Todd**

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**From:** nancy mckeever <nancyjmckeever@gmail.com>  
**Sent:** Monday, March 15, 2021 2:47 PM  
**To:** PER. climateactionplan  
**Subject:** SUPPORT - Measure GHG-09: Electric Landscaping Equipment and Trade-In Program

**EXTERNAL EMAIL:** If unknown sender, **do not** click links/attachments.

County Supervisors and Staff,

I am writing to express strong **support for MEASURE GHG-09: ELECTRIC LANDSCAPING EQUIPMENT** in the proposed Climate Action Plan and to **encourage rapid adoption and full implementation of a County/SMAQMD incentive program to trade in gas-powered landscaping equipment** for electric and zero-emission equipment.

The California Air Resources Board projected gas-powered lawn equipment would be more polluting than cars by 2020. Clearly, electrification of landscaping equipment is an essential effort toward achieving climate goals. In addition to the extreme pollution emitted from two and four stroke gas-powered engines, they are much louder than electric-powered equipment, which both damages the hearing of the workers who use them and the residents in the vicinity. With an affordable, off-the-shelf alternative to highly polluting gas-powered landscaping equipment already available, this measure should be immediately implemented.

Thank you,  
Nancy McKeever  
Sacramento, CA

Sent from [Mail](#) for Windows 10

## Taylor. Todd

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**From:** Taylor. Todd  
**Sent:** Monday, March 29, 2021 12:58 PM  
**To:** PER. climateactionplan  
**Subject:** FW: Proposed All-Electric Requirement for Future Residential Development  
**Attachments:** Proposed All-Electric Requirement for Future Residential Development- Sacramento Housing Alliance.pdf

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**From:** Ejiro Okoro <Ejiro@sachousingalliance.org>  
**Sent:** Monday, March 29, 2021 12:44 PM  
**To:** smithtodd@saccounty.net; Lundgren. John <lundgrenj@saccounty.net>; Taylor. Todd <taylor@t@saccounty.net>  
**Cc:** Kendra Lewis <kendra@sachousingalliance.org>; cathy creswell <cat.creswell@comcast.net>  
**Subject:** Proposed All-Electric Requirement for Future Residential Development

**EXTERNAL EMAIL:** If unknown sender, **do not** click links/attachments.

Good day,

Please see the following letter regarding the proposed all electric requirement for future residential development. Please feel free to contact us if you have any questions, and we are available to meet to further discuss proposals.



<https://sachousingalliance.org/>

March 26, 2021

Sacramento County Board of Supervisors  
700 H Street  
Sacramento, CA 95814

RE: Proposed All-Electric Requirement for Future Residential  
Development

Dear Honorable Chairwoman Frost and Members of the Board of  
Supervisors:

On behalf of the Sacramento Housing Alliance (SHA), we are writing regarding the County's proposed all-electric policy for new residential development. The Sacramento Housing Alliance's affordable housing developers have led on sustainable building practices and support the County's all-electric proposal with three caveats.

First, the County must synchronize its all-electric policy with SMUD's adopting a "Virtual Net Energy Metering" billing option for multifamily rental properties. Virtual Net Energy Metering allows individual renters to benefit from on-site energy generation by allowing monthly crediting against tenant-paid utility bills. In addition, affordable rental housing developers can borrow larger sums based upon anticipated savings from that on-site generation and smaller utility allowances that otherwise reduce rental income. While private Investor Owned Utilities, like PG&E, provide a Virtual Net Energy Metering billing feature, SMUD does not. All-electric affordable multifamily developments are not feasible without SMUD providing a Virtual Net Energy Metering billing feature, and the County should not apply the proposed policy to affordable rental developments until SMUD has such a billing system in place.

Second, the up-front costs associated with installing all-electric systems are higher than including some gas features. Our nonprofit affordable housing developers estimate a seventy-five hundred to fifteen thousand dollar (\$7,500 - \$15,000) per-unit cost increase for all-electric systems. The County should work closely with local developers to mitigate those costs since State affordable housing funding sources are now competitively rewarding development cost reduction.

SHA  
Board of Directors

Cathy Creswell  
President  
At-large

Paul Ainger  
Treasurer  
Volunteers of America

Valerie Feldman  
Secretary  
At-large

LaShawnda Barker  
At-large

Stephan Daues  
Mercy Housing

Tamie Dramer  
Organize Sacramento

Jenn Fleming  
Mercy Housing

John Foley  
Sacramento Self Help  
Housing

Nur Kausar  
At-large

Stanley Keasling  
At-large

Alicia Sebastian  
California Coalition for  
Rural Housing

Rachel Smith  
Rural Community  
Assistance Corporation

Holly Wunder-Stiles  
Mutual Housing  
California

Finally, SHA's developers would reflect additional all-electric costs in their local funding applications. The County should increase its loan amounts available for such affordable housing developments.

In closing, SHA supports the all-electric proposal, with our three caveats. Thank you.

CC. Todd Smith  
Principal Planner  
Long Range Planning & Master Plans  
Sacramento County

Sincerely,

A handwritten signature in black ink, appearing to be 'Kendra Lewis', with a large loop at the top and a horizontal line extending to the right.

Kendra Lewis, Executive Director  
Sacramento Housing Alliance

A handwritten signature in black ink, appearing to be 'Cathy Creswell', written in a cursive style.

Cathy Creswell, Board President  
Sacramento Housing Alliance

## Taylor. Todd

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**From:** Virginia Volk-Anderson <vanderv@surewest.net>  
**Sent:** Saturday, April 3, 2021 2:39 PM  
**To:** PER. climateactionplan  
**Subject:** Draft CAP

EXTERNAL EMAIL: If unknown sender, do not click links/attachments.

While I appreciate that a great deal of effort has gone into creating the CAP, the document is disappointing in several ways. Firstly, we are in a crisis as vividly presented in the Climate Emergency Declaration adopted by Sacramento County. The CAP does not reflect the urgency of the situation or fully align with the declaration; the declaration should guide the CAP. Another concern is that the CAP allows for sprawl, which will only increase miles driven and lead to greater GHG emissions while simultaneously destroying more of the county's tree canopy. There needs to be a much stronger emphasis on infill. And thirdly, the CAP seems to kick a lot of implementation down the road, with little action for at least two-to-three years.

Thank you for your consideration of my comments and concerns.

Virginia Volk-Anderson  
1408 La Sierra Drive  
Sacramento, CA 98864

## Taylor. Todd

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**From:** Ronnie Jeanne Amato <outlook\_472D695ED88EEA44@outlook.com>  
**Sent:** Saturday, April 3, 2021 9:45 PM  
**To:** PER. climateactionplan  
**Subject:** Too many Dismissals

**EXTERNAL EMAIL:** If unknown sender, **do not** click links/attachments.

There was so much to go through but I didn't see anything for "grey water" Innovation.

I think a priority is to get government offices on solar electricity. Certainly gyms could be made to utilize their electrical equipment supplied by customers' activity. That should not be difficult for an engineer to device.

My personal hope is to get all electricity appliances, solar electricity and then I can purchase an EV. It would be helpful is there was incentive for "instant hot water." Much of my water is wasted waiting for the heated water. The Fair Oaks Water District could provide service personnel to evaluate and implement water heaters in residences and innovation for recycling grey water.

Everyone who has some land, about up to ½ acre, should be required to grow something of value for the community. It is the privilege of having that land. It could be a fruit tree or tomatoes. These items can be collected by the owner and deposited in the Food Banks or put at curb or allowed designated others to pick and deposit at the Food Banks or curb. More crazy ideas column might get us going on what we have to do.

Sent from [Mail](#) for Windows 10

**Taylor. Todd**

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**From:** Barbara Baran <b.baran@comcast.net>  
**Sent:** Sunday, April 4, 2021 11:37 AM  
**To:** PER. climateactionplan  
**Subject:** National Council of Jewish Women-Sacramento Comments on proposed Climate Action Plan

**EXTERNAL EMAIL:** If unknown sender, **do not** click links/attachments.

To whom it may concern:

As a resident of Sacramento and member of the National Council of Jewish Women-Sacramento, I urge that the proposed Climate Action Plan include the following:

1. The public draft of the CAP should specifically address the directives and goals of the County of Sacramento Climate Emergency Declaration (CED). This is just common sense as well as good government. The CAP is the foundational document of the county's response to climate change and the current version should address the goals and actions needed to mitigate the climate crisis now. Delaying inclusion of mitigation measures and goals until the next CAP will have significant deleterious consequences.
2. The public outreach for the CAP needs to be improved in several ways: by lengthening the public comment period to 60 days from 30 days, and by seeking public participation through many methods of outreach, including more workshops for the public. The current review process for the CAP has provided less opportunity for public involvement than other current County plans. Public outreach should be consistent with the CED directive that "*the scope and scale of action necessary to stabilize the climate will require unprecedented levels of public awareness, engagement and deliberation to develop and implement effective, just and equitable policies to address the climate crisis.*"

3. The CAP needs to provide a specific implementation plan for the suggested measures, which includes regular monitoring and methods to adapt to changing conditions.
4. The CAP should commit to keeping and using carbon offset funds locally, by funding local measures which reduce greenhouse gas emissions and/or help the community adapt to climate change impacts.
5. Environmental Justice measures, which mitigate the impacts of climate change on communities that suffer the greatest impacts, as identified by the CED, need to be included in the plan. Carbon offsets should be identified as a funding source.
6. The plan should include provisions for land use measures which will stabilize greenhouse emissions, including incentives for infill development and development near transportation hubs. The plan should address current county policies which facilitate “leapfrog” development that result in increasing greenhouse gas emissions due to increased transportation emissions.

Thank you for your time and consideration,

Barbara Baran  
National Council of Jewish Women-Sacramento

**Taylor. Todd**

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**From:** Claire <clairelipschultz@gmail.com>  
**Sent:** Sunday, April 4, 2021 11:44 AM  
**To:** PER. climateactionplan  
**Subject:** Comments on Sacramento Climate Action Plan

**EXTERNAL EMAIL:** If unknown sender, **do not** click links/attachments.

As a resident of Sacramento County I commend the steps taken toward creating a plan to address the all important issue of climate change. However there are some deficiencies in the plan which I outline below. Please take all measures necessary to ensure a comprehensive, effective Plan.

Thank you for your consideration.

Claire Lipschultz,  
6344 Palm Drive  
Carmichael,CA.

1. The public draft of the CAP should specifically address the directives and goals of the County of Sacramento Climate Emergency Declaration (CED). This is just common sense as well as good government. The CAP is the foundational document of the county's response to climate change and the current version should address the goals and actions needed to mitigate the climate crisis now. Delaying inclusion of mitigation measures and goals until the next CAP will have significant deleterious consequences.
2. The public outreach for the CAP needs to be improved in several ways: by lengthening the public comment period to 60 days from 30 days, and by seeking public participation through many methods of outreach, including more workshops for the public. The current review process for the CAP has provided less opportunity for public involvement than other current County plans. Public outreach should be consistent with the CED directive that *"the scope and scale of action necessary to stabilize the climate will require unprecedented levels of public awareness, engagement and deliberation to develop and implement effective, just and equitable policies to address the climate crisis."*
3. The CAP needs to provide a specific implementation plan for the suggested measures, which includes regular monitoring and methods to adapt to changing conditions.
4. The CAP should commit to keeping and using carbon offset funds locally, by funding local measures which reduce greenhouse gas emissions and/or help the community adapt to climate change impacts.
5. Environmental Justice measures, which mitigate the impacts of climate change on communities that suffer the greatest impacts, as identified by the CED, need to be included in the plan. Carbon offsets should be identified as a funding source.

6. The plan should include provisions for land use measures which will stabilize greenhouse emissions, including incentives for infill development and development near transportation hubs. The plan should address current county policies which facilitate “leapfrog” development that result in increasing greenhouse gas emissions due to increased transportation emissions.

Thank

**Taylor. Todd**

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**From:** Elliott Wezerek <ewezerek@gmail.com>  
**Sent:** Sunday, April 4, 2021 8:11 PM  
**To:** PER. climateactionplan  
**Subject:** GHG Reduction Methodology

**EXTERNAL EMAIL:** If unknown sender, **do not** click links/attachments.

Hello,

I have one comment on the County's recently drafted CAP.

Table 1, *Summary of GHG Reduction Measures*, cites "Ascent Environmental 2021" as the source for the emission reduction values. This source does not appear in the references section and is not presented as an appendix or as a separate document elsewhere on the CAP website. Please provide the emission reduction calculation methodology for each measure that appears in Table 1.

Thank you,  
Elliott

## Taylor. Todd

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**From:** Steve Letterly <sletterly@letterlymgmt.com>  
**Sent:** Monday, April 5, 2021 9:25 AM  
**To:** PER. climateactionplan  
**Cc:** Smith. Todd; 'demetercorp@sbcglobal.net'; Margie Campbell; John Norman; 'George Phillips (gphillips@phillipslandlaw.com)'; Gregory Thatch; Moffitt. Leighann; Lundgren. John  
**Subject:** Grandpark Comments On Sacramento County Draft Climate Action Plan (CAP)  
**Attachments:** Grandpark County of Sacramento draft CAP comment letter April 5 2021.pdf

**EXTERNAL EMAIL:** If unknown sender, **do not** click links/attachments.

Thank you for allowing the opportunity to comment on the draft CAP. Attached are the comments from the Grandpark Owners Group, project applicants for the Grandpark Specific Plan.

Steve Letterly  
Grandpark Project Manager  
[sletterly@letterlymgmt.com](mailto:sletterly@letterlymgmt.com)  
cell 949-422-2860



April 5, 2021

## **GRANDPARK COMMENTS SACRAMENTO COUNTY DRAFT CLIMATE ACTION PLAN**

Thank you for providing the Grandpark Specific Plan team the opportunity to provide comments regarding the Draft Climate Action Plan (CAP). Grandpark is a 5,700-acre mixed use specific plan proposed in the northwest portion of the County of Sacramento. As a major proposed development, the project applicants were requested to help fund development of Phase II of the CAP. The project applicants concurred with assisting with CAP II funding and appreciate the hard work by the County and consultant team in developing the draft document. Upon review of the draft, we do have questions and appreciate the opportunity to provide these comments.

### **General Comments**

1. The Plan in many areas is vague and needs definition to be useful to applicants. It would be helpful to provide intent language that sets forth how the CAP is to be used to guide future development in unincorporated Sacramento County. For example, is the CAP intended to be used as a menu of mandatory and optional measures from which development projects may choose in order to meet quantified mitigation obligations for development? If so, please clarify. How does a project illustrate consistency with the CAP? Unlike the County's recent VMT thresholds, we could not ascertain a clear method of illustrating consistency.
2. A number of the GHG mitigation measures are not quantified. How can the unquantified measures accurately portray reduction of GHG emissions within the County? How will projects be able to use the mitigation measures to reduce GHG emissions if no quantification is provided?

3. On page one of the CAP it states that the plan has been developed in response to mitigation measures contained in the County's General Plan. Yet there is no accommodation for future projects that are consistent with the General Plan. Would a project consistent with the General Plan also be considered consistent with the CAP? What will be the review process under the CAP for such projects?

4. Table 1; Sacramento County Baseline and Forecast GHG Emissions by Sector (Off-Road Vehicles). Table 1 identifies an increase in GHG emissions for the Off-Road Vehicle Sector between 2015 and 2030. The 2015 BAU emissions presented in the CAP appear to be from a 2016 memo published by Ascent Environmental. This memo also includes a projection of 2030 BAU. The CAP should have taken this 2030 BAU and scaled down emissions based on all relevant state, federal, and district regulation. While this appears to be the case for every other source category, there is no reduction taken for off-road equipment, even though the emissions from off-road equipment are expected to decrease due to idling limits, low carbon fuel standards, etc. It seems appropriate to incorporate off-road regulations in the 2030 emission forecast.

### **Comments on GHG Reduction Measures**

#### **1. Measure GHG-02: Urban Forestry**

How will the County maintain and enhance the urban forest? Will there be a verification process in place to measure the reduction in GHG emissions? What is the measure of success for such a program? How will the County ensure that the trees required to be planted through the Zoning Code are properly maintained to maximize tree health? Who will be responsible for the cost?

#### **2. Measure GHG-05: Increase Energy Efficiency in New Commercial Buildings**

Would the reach code exceed state building code requirements? If so, how far beyond the State minimum requirements will the reach code go? Will there be incentives for complying with the reach code? How can this GHG reduction be quantified when no specifics are given?

### 3. Measure GHG-06: Energy Efficiency and Electrification of Existing Residential Buildings

Is it anticipated that a credit program will be established by which developers can purchase credits the funds from which will be used to retrofit existing residential units? By including an option that allows funding of a credit program that assist residential retrofitting, such a program could provide superior reductions in energy consumption and address social equity. If so, what is the timing anticipated for developing the program? Combining the reductions that would occur through improving energy efficiency in existing residential units with partial elimination of fossil fuel consumption in new residential buildings (GHG-07) could result in greater emission reductions and provide economic and environmental benefits to underserved communities. The GHG measures should be presented as a menu approach with an overall Project reduction target.

### 4. Measure GHG-07: Eliminate Fossil Fuel Consumption in New Residential Buildings

SMAQMD identifies all electric residential units in new development as an option to reduce GHG emissions. We suggest mirroring this approach, rather than making it a mandatory obligation if a project can implement measures with equivalent emission reductions as all electric homes. The SMAQMD, in June 2020, finalized the document, Greenhouse Gas Thresholds for Sacramento County. In it SMAQMD included best management practices which included no natural gas. However, it stated that alternatives may be proposed that demonstrate the same level of GHG reductions as no natural gas. (Greenhouse Gas Thresholds for Sacramento County, pg. 39). Can there be alternatives for eliminating fossil fuel for projects that could demonstrate that they can reduce GHG in other ways? What about projects where all electric is infeasible? Will there be an infeasibility exception?

#### 5. Measure GHG-08: Tier 4 Final Construction Equipment

Is there a phase-in timeline for this update? Is it only after January 1, 2030 that a Project application must include 100% Tier 4 final engines or electric engines? Additionally, Tier 4 engines do not reduce GHGs, and can often have climate penalty due to increased power needs for necessary control technology (SCR and DPF). Can renewable diesel be used in lieu of a Tier 4 engine? Renewable diesel would have a GHG benefit.

#### 6. Measure GHG-09: Electric Landscaping Equipment

How and when will “not quantified” measures be quantified to determine the effect of their implementation? Similar to GHG-06 could implementation of this measure benefit from establishment of credit purchase program.

#### 7. Measure GHG-11: Reduce Emissions from New Residential and Office/Business Professional Development Vehicle Miles Traveled

The component pieces of the VMT Mitigation Program should be identified. How would the VMT mitigation fee, bank or exchange work? When will the guidance be developed? Would there be a cost backstop for this measure? Is there more information about the VMT-related funding mechanism?

How will emission reduction requirements be adjusted over time to acknowledge ongoing changes to commute patterns and volumes due to fundamental and likely permanent shifts to working from home for many occupations? How will emission reduction requirements be adjusted over time to acknowledge increases in E-commerce and mobile delivery services and reductions in VMT?

Does the regional average include all of SACOG's five counties? The second bullet states, "Develop and adopt a VMT mitigation program... to offset project-level and cumulative VMT impacts...". If a project exceeds the "regional" average, it will most likely have to pay an impact fee. What if the project could be mitigated so as to not have a significant impact? Should the line state "to offset an unmitigated impact" from VMT? Will payment of VMT fees equate to a reduction in a projects VMT and potential consistency with VMT thresholds?

#### 8. Measure GHG-12 Transportation System Management Plan for Non-Residential Projects:

Provide information on what is the criteria for a "qualifying project". How will the minimum trip generation requirements be defined? What will be the basis for this definition? How will the minimum trip generation requirements be determined? The first bullet states, "project types and sizes required to implement a TSM Plan," this bullet is unclear and needs further description. What type of project? What size? This requirement needs to be defined.

The third bullet states, "development of monitoring and reporting requirements that developers or property owners would be responsible for submitting to the county on an annual basis." This is incredibly burdensome. What type of reporting requirements? What is being monitored? Will reporting annually be indefinite? How will it be enforced, especially when property may be transferred many times.

#### 9. Measure GHG-13: Revise Parking Standard for Non-Residential Development

How will shared parking be implemented and required? What does unbundling parking for new development mean? Is there a quantitative goal for the revised parking standards? What constitutes success for this measure?

Prior to the County updating the parking standards by end of 2022 pending Specific/Master Plans should be provided the opportunity to pursue revised parking standards.

#### 10. Measure GHG-14: Improved Transit Access

This measure should acknowledge changes in future travel patterns, vehicle ownership and growth in ride sharing opportunities, and how this evolution will either complement, or in some cases replace, traditional transit service.

Where will the County seek funding to plan and construct roadways, bikeways, and pedestrian improvements? How will the needed improvements be determined? Will there be an increase of fees for developers to build these improvements? If so, where is the nexus?

#### 11. Measure GHG-15: Improved Pedestrian Network and Facilities

Develop quantified credits to new development that implement innovative bike/ped facilities/connections within a project. Such credits will incentivize future development. If there is no quantified credit received, why do it?

How will the VMT mitigation program funding mechanism be divided among the different improvements? Will there be a priority list for the improvements?

The VMT mitigation program seems to be the funding mechanism of many improvements. Will the VMT mitigation program be able to cover the cost of all these improvements?

#### 12. Measure GHG-16: Traffic Calming Measures

Quantified credits for the various traffic calming measures should be developed.

### 13. Measure GHG- 17: Improved Bicycle Network and Facilities

Quantified credits should be developed. Projects that have high a ratio of bike lanes/trails per square mile, provide a variety of bike lane classes (Class 1 through 4) and are planned to logically connect residences with activity nodes should receive quantified credits.

### 14. Measure GHG -19: EV Parking Code

What is the proposed timeline for this update?

### 15. Measure GHG-21: Update Community and Corridor Plans

This measure should provide for high density residential development as of right in all commercial zones county-wide, with only design review to better assist intensification in infill and corridor areas.

### 16. Measure GHG-22: Connecting Key Destinations

Develop quantified credits to new development that achieves the target indicators. Is this system only with respect to existing community-supportive destinations? In other words, if the Project includes housing and commercial and community centers, schools, and parks, will these be factored into their score?

How were the distances for each transportation mode determined? Are there support documents as to how these determinations were made?

How will the GIS-based scoring system be developed? What is the proposed timeline for this update? What would the minimum point total be for compliance with the GIS-based scoring system? Who makes this determination? How will the points be assigned?

#### 17. Measure GHG-23: Incentivize Infill Development

Develop quantified credits for incentivizing infill development? How is the Dwelling Unit Equivalent (DUE) defined? How, was the nexus between pending master plans and incentivizing infill development developed? If a pending master plan falls below the VMT thresholds shouldn't the project be exempt from the fee?

This measure appears to assume that VMT will always be increased by a project if it is not infill development. What if a project does not increase VMT? What if all impacts are mitigated? If VMT is not increased, will the infill fee still apply? If VMT is not increased and the infill fee still applies, what is the nexus for requiring developers to pay this fee? Should the fee be based on a sliding scale based on amount of threshold exceedance? Shouldn't payment of fee result in VMT reduction credit? Is the Infill Fee a one-time fee paid only when obtaining building permits?

#### 18. Measure GHG-24: Increase Organic Waste Diversion

What programs will be put in place to increase local capacity for composting and processing of organic waste? Could pending specific plans/master plans be incentivized to implement measures prior to 2030 and if so can credits be quantified?

### **Climate Change Adaptation Strategy Comments**

#### 1. TEMP-04; Encourage the Installation or Use of Cool-Roof Technologies, Passive Solar Home Design, Green Roofs, and Rooftop Gardens

How are "cool roof technologies" defined? How will the incentive programs for installing passive solar technology or green roofs be determined? What is the proposed timeline for the update?

2. TEMP-07: Use Cool Pavement Technology and Reduce the Amount of Paved Surfaces

How are “cool pavement technologies” defined? What is the proposed timeline for this update?

3. TEMP-08: Increase Parking Lot Shading, Landscaping, and Urban Greening, Prioritizing Communities with Less Tree Cover

How will the incentive programs for installing solar PV carports be determined? Could this program be another example of a credit program for existing development to offset emissions from new projects?

The measure discusses revising parking lot shading standards to include larger minimum sizes for tree planters. What size tree planters?

4. WATER -01: Evaluate Vulnerabilities of Water Supply Systems and Networks and Develop Strategies to Improve Resilience

What is the proposed timeline for this update?

5. WATER-04: Reduce Potable Water Use in Outdoor Landscaping

Is there a published list of low-water, drought tolerant species approved for landscaping? What is the timeline for this update?



## Appendix E 1.2 Forecast Comment

1. Table E-3 and paragraph on page E-4 states that the 2030 Adjusted BAU Forecast is 16% less than 2015; or 3,202,311 MTCO/year vs. 4,853,647MTCO/year. Isn't the 1.6 million decrease greater than 16%?

Thank you for this opportunity to comment on the draft CAP. If you should have any questions please e-mail or contact me by phone.

Steve Letterly  
Grandpark Project Manager  
sletterly@letterlymgmt.com  
cell 949-422-2860

## Taylor. Todd

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**From:** Larry Larsen <llarsen@thatchlaw.com>  
**Sent:** Monday, April 5, 2021 4:44 PM  
**To:** PER. climateactionplan  
**Cc:** Denise Gammon; Holger Fuerst; Smith. Todd; Gregory Thatch  
**Subject:** Community Climate Action Plan Comment Letter - Law Offices of Gregory D. Thatch  
**Attachments:** Community Climate Action Plan Comment Letter - 04-04-2021.pdf

**EXTERNAL EMAIL:** If unknown sender, **do not** click links/attachments.

Attached please find the comment letter of today's date regarding the comments of Mr. Thatch on behalf of Cordova Hills, LLC.

Should you wish to discuss the matter further, please do not hesitate to contact Mr. Thatch or me.

*Larry C. Larsen*  
LAW OFFICES OF  
GREGORY D. THATCH  
1730 I Street, Suite 220  
Sacramento, CA 95811  
Phone: (916) 443-6956  
Fax: (916) 443-4632  
E-Mail: [llarsen@thatchlaw.com](mailto:llarsen@thatchlaw.com)

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ASHLIN Y. LUTES

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Telephone (202) 682-4735  
Facsimile (202) 289-8683

April 4, 2021

**VIA ELECTRONIC MAIL ONLY**

Sacramento County  
Planning and Environmental Review  
Email: ClimateActionPlan@saccounty.net

RE: Cordova Hills, LLC  
Communitywide Climate Action Plan Comments

Dear Staff:

This office represents Cordova Hills, LLC, the Property Owner for the Cordova Hills Project that was approved by the County in 2013. Consistent with the County's Climate Action Plan website directions, we hereby submit the following comments on the Communitywide Climate Action Plan.

As part of the project approvals for the Cordova Hills Master Plan, the County and the Property Owners entered into a written Development Agreement to permit the Property Owners to develop the property consistent with the terms of the Development Agreement. The Development Agreement was entered into on March 12, 2013 and has an initial term of thirty (30) years. The Development Agreement remains in place and continues to apply to development of the Cordova Hills Master Plan.

The draft Climate Action Plan includes a series of proposed Greenhouse Gas Reduction Measures, including GHG-23 – Incentivize Infill Development. While this measure does not quantify the level of Greenhouse Gas reduction to be realized by the proposed infill incentives, it does include a table on page 19 that lists a number of Master Plan areas in the County, including the Cordova Hills Master Plan, upon which the County proposes to impose an "Infill Fee" of "\$1,000 for each Dwelling Unit Equivalent."

Section 4.2.5.2 of the DA addresses Development Impact Fees, Exactions and Dedications and reads as follows (highlights are added for emphasis):

County agrees that Property Owners shall be required to pay only those development impact fees, connection or mitigation fees, or offer dedications of land, or other exactions required by County to support the construction of public facilities and improvements or the provision of public services in relation to development of the Project that are enumerated in Exhibit J to this Agreement. The County and Property Owners agree to meet every five (5) years commencing from the date of issuance of the first Certificate of Occupancy in the Project area to review the list of fees and fee programs specified in Exhibit J and consider the mutual benefit, if any, of amending same. The list of fees and fee programs may only be amended by mutual, written consent of the County and Property Owners.

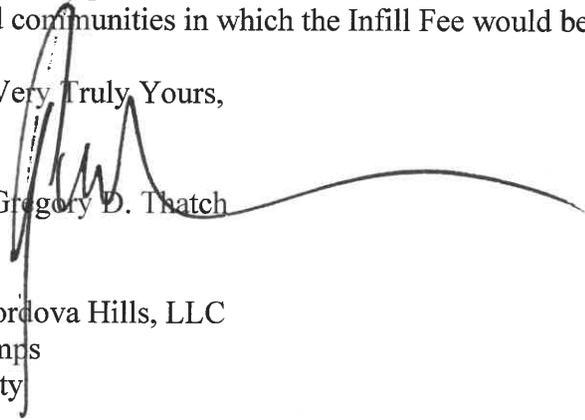
The Development Agreement between the Cordova Hills Property Owners and the County meticulously identified in Exhibit J (copy attached) County impact fees that could be payable by the Property Owners, including a number of possible future fees that might be adopted. No Infill Fee or any synonymous fee is specified in Ex. J. Thus, this Infill Fee, if adopted, cannot be imposed on the Cordova Hills Project.

We also note that, according to the draft Climate Action Plan (page 5), two Specific Plan development agreements approved in 2020 included an Infill Fee requirement – further ancillary evidence that earlier Development Agreements, such as Cordova Hills’, do not include a requirement to participate in any Infill Fee.

On behalf of Cordova Hills, LLC, we respectfully request that the CAP be revised to remove the Cordova Hills Master Plan area from the list of master planned communities in which the Infill Fee would be imposed.

Very Truly Yours,

Gregory D. Thatch



GDT:ll

cc via email: Denise Gammon, President, Cordova Hills, LLC  
Holger Fuerst, McKay and Soms  
Todd Smith, Sacramento County

## EXHIBIT J

### DEVELOPMENT IMPACT FEES, EXACTIONS AND DEDICATIONS

A. The Cordova Hills Project shall be subject to the below Cordova Hills Project related districts and programs:

- Cordova Hills Special Plan Area Fee Program.
- Future districts to be established to fund the services identified in the Cordova Hills Urban Services Plan.

B. In addition to the items identified in Section A, the Cordova Hills Project shall only be subject to the below County fee programs and districts to the extent that: i) the fee program or district is in effect at the time of such development approval (e.g., building permit, rezone, tentative map), as specified in each district or program; and ii) the fee program or assessment is applicable to the Cordova Hills Project.

1. The Cordova Hills Project shall be subject to the following County Development Impact fee programs, as they may be adjusted or amended from time to time:

- Sacramento County Transportation Development Fee Program (SCTDF) District 3 Roadway and Transit Fee Program.
- Sacramento Public Library Authority Development Impact Fee Program
- Very Low Income Housing Fee on non-residential properties pursuant to Chapter 16.89 of the Sacramento County Code

2. The Cordova Hills Project shall be subject to the following County special taxes, assessment districts, and utility services or equivalent replacement mechanisms to the satisfaction of the County:

- Sacramento County Police Services CFD No. 2005-1.
- CSA-1 (Safety and Street Lighting).
- Sacramento County Storm Water Utility District.
- CSA-11 (Police Protection and latent Animal Control Services).

3. The Cordova Hills Project shall be subject to the following financing programs or equivalent mechanisms to the satisfaction of the County:

- Any future County-wide Storm Water CFD required to fund maintenance of expanded stormwater/stormwater

quality/hydromodification basins and facilities required as a result of State or Federal mandates and which are not included in the existing County Storm Water Utility program.

- Any future County-wide Roadway Maintenance Financing Mechanism.
- Any future Financing Mechanism adopted by the County on a regional or sub-regional benefit basis related to the Southeast Connector.
- Any future County-wide Regional Park Financing Mechanism.
- Any future County-wide fee programs that are a result of a Federal or State mandate.

**From:** Patricia Sturdevant <patricia.sturdevant@gmail.com>  
**Sent:** Wednesday, April 7, 2021 7:20 AM  
**To:** PER. climateactionplan  
**Subject:** Comments on Sacramento Climate Action Plan

**EXTERNAL EMAIL:** If unknown sender, **do not** click links/attachments.

I am a resident of Sacramento County, and commend the steps you have taken to create a plan to address climate change. However there are some deficiencies in the plan which I have described below. Please take all measures necessary to ensure that your plan will be both comprehensive and effective in addressing this crucially important issue.

Patricia Sturdevant  
1836 8th Avenue, Sacramento, CA 95818

1. The public draft of the CAP should specifically address the directives and goals of the County of Sacramento Climate Emergency Declaration (CED). This is just common sense as well as good government. The CAP is the foundational document of the county's response to climate change and the current version should address the goals and actions needed to mitigate the climate crisis now. Delaying inclusion of mitigation measures and goals until the next CAP will have significant deleterious consequences.
2. The public outreach for the CAP needs to be improved in several ways: by lengthening the public comment period to 60 days from 30 days, and by seeking public participation through many methods of outreach, including more workshops for the public. The current review process for the CAP has provided less opportunity for public involvement than other current County plans. Public outreach should be consistent with the CED directive that "*the scope and scale of action necessary to stabilize the climate will require unprecedented levels of public awareness, engagement and deliberation to develop and implement effective, just and equitable policies to address the climate crisis.*"
3. The CAP needs to provide a specific implementation plan for the suggested measures, which includes regular monitoring and methods to adapt to changing conditions.

4. The CAP should commit to keeping and using carbon offset funds locally, by funding local measures which reduce greenhouse gas emissions and/or help the community adapt to climate change impacts.
5. Environmental Justice measures, which mitigate the impacts of climate change on communities that suffer the greatest impacts, as identified by the CED, need to be included in the plan. Carbon offsets should be identified as a funding source.
6. The plan should include provisions for land use measures which will stabilize greenhouse emissions, including incentives for infill development and development near transportation hubs. The plan should address current county policies which facilitate “leapfrog” development that result in increasing greenhouse gas emissions due to increased transportation emissions.

**Taylor. Todd**

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**From:** Susan Rosenberg <susanarosenberg@gmail.com>  
**Sent:** Wednesday, April 7, 2021 8:57 PM  
**To:** PER. climateactionplan  
**Subject:** Comments on the County of Sacramento Draft Climate Action Plan

**EXTERNAL EMAIL:** If unknown sender, **do not** click links/attachments.

I am a resident of Sacramento County and support the development an updated Climate Action Plan (CAP). I am concerned that, in several critical areas, the draft CAP and the public notice procedures are inadequate, as described below. Please take all necessary steps to ensure that the plan itself will address these concerns.

Susan Rosenberg  
1704 Potrero Way  
Sacramento, CA 95822

1. The public draft of the CAP should specifically address the directives and goals of the County of Sacramento Climate Emergency Declaration (CED). This is just common sense as well as good government. The CAP is the foundational document of the county's response to climate change and the current version should address the goals and actions needed to mitigate the climate crisis now. Delaying inclusion of mitigation measures and goals until the next CAP will have significant deleterious consequences.
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3. The CAP needs to provide a specific implementation plan for the suggested measures, which includes regular monitoring and methods to adapt to changing conditions.

4. The CAP should commit to keeping and using carbon offset funds locally, by funding local measures which reduce greenhouse gas emissions and/or help the community adapt to climate change impacts.
5. Environmental Justice measures, which mitigate the impacts of climate change on communities that suffer the greatest impacts, as identified by the CED, need to be included in the plan. Carbon offsets should be identified as a funding source.
6. The plan should include provisions for land use measures which will stabilize greenhouse emissions, including incentives for infill development and development near transportation hubs. The plan should address current county policies which facilitate “leapfrog” development that result in increasing greenhouse gas emissions due to increased transportation emissions.

## Taylor. Todd

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**From:** Jill <jillpz@yahoo.com>  
**Sent:** Thursday, April 8, 2021 9:31 AM  
**To:** Kennedy. Supervisor; Rich Desmond; Supervisor Serna; Nottoli. Don; Frost. Supervisor; PER. climateactionplan  
**Cc:** Edith Thacher  
**Subject:** Citizens' Climate Lobby of Sacramento Comments to Public Draft of County Climate Plan  
**Attachments:** Final CCL Sacramento CAP Comments April 2021.pdf

**EXTERNAL EMAIL:** If unknown sender, **do not** click links/attachments.

Good morning,

Attached for your consideration is a letter written on behalf of the Sacramento Chapter of Citizens' Climate Lobby providing our comments to the March 2021 draft of the County Climate Action Plan for which you sought public comment. Thank you for the opportunity to provide input on this extremely important document. We are available to answer any questions you may have after reviewing our letter.

Thank you,

Edith Thacher  
Lead, Sacramento Chapter, Citizens' Climate Lobby

Jill Peterson  
Volunteer, Sacramento Chapter, Citizens' Climate Lobby



April 8, 2021

The Honorable Patrick Kennedy: [SupervisorKennedy@saccounty.net](mailto:SupervisorKennedy@saccounty.net)

The Honorable Rich Desmond: [richdesmond@saccounty.net](mailto:richdesmond@saccounty.net)

The Honorable Phil Serna: [SupervisorSerna@saccounty.net](mailto:SupervisorSerna@saccounty.net)

The Honorable Don Nottoli: [nottolid@saccounty.net](mailto:nottolid@saccounty.net)

The Honorable Sue Frost: [SupervisorFrost@saccounty.net](mailto:SupervisorFrost@saccounty.net)

Sacramento County Office of Planning and Environmental Review  
827 7th Street  
Sacramento, CA 95814  
c/o [ClimateActionPlan@saccounty.net](mailto:ClimateActionPlan@saccounty.net)

**Re: Citizens' Climate Lobby, Sacramento Chapter-Public Comment on Sacramento County Climate Action Plan Public Draft dated March 2021**

Dear Supervisors Kennedy, Desmond, Serna, Nottoli and Frost and Staff at the Office of Planning and Environmental Review:

We are writing on behalf of the Sacramento Chapter of Citizens' Climate Lobby (CCL) in response to the Sacramento County Climate Action Plan Public Draft dated March 2021 (Draft #1 CAP) for which the County is seeking public comment.

Our organization was asked by and submitted comments to the Sacramento County (County) staff on January 17, 2021 regarding the Administrative Draft of the County's Climate Action Plan. While Draft #1 CAP, released for public comment, has some modifications, we remain concerned that the same issues we raised with regard to the Administrative Draft continue to plague the current version. Draft #1 CAP portrays the County as an entity that will "encourage" and/or "support" certain actions. Given the Climate Emergency recognized by the Board, the **County must be a leader in the fight against climate change**. Draft #1 CAP falls far short of showing the needed leadership. The CAP must above all take strong action on both land use issues and transportation. At the same time, it must move quickly to implement electrification and set specific goals and targets on all measures that provide for accountability. In addition, there must be regular reports to the Board at least every 60 days to update the Board on the progress being made on the goals set. One need only look to the language the Board used in its Declaration of a Climate Emergency to see that

the Board committed itself to prompt, effective and decisive actions directed toward carbon neutrality by 2030 in the County's Climate Action Plan. That Declaration States at page 3:

**BE IT FURTHER RESOLVED**, The County of Sacramento commits to building on existing climate action commitments and **taking (sic) significant steps to sustain and accelerate** short term communitywide carbon elimination **and all efforts and actions necessary to eliminate emissions by 2030**, recognizing that such a goal will only be achieved through **regional collaboration between multiple partners; and**

**BE IT FURTHER RESOLVED, The Communitywide Climate Action Plan shall explain the County's approach to reduce greenhouse gas emissions in order to achieve carbon neutrality by 2030**, building on recommendations and analysis from community partners, and suggested mitigation measures from climate experts, urban and regional planners, community members, and economists. Development and implementation of the plan shall be guided by science, data, best practices, and equity concerns; Emph. Added. We ask that the CAP reflect this commitment. We also ask that the County collaborate with the City of Sacramento in this work, along with other regional partners including SACOG. This collaboration not only makes sense, but the Board's December Declaration also commits to regional collaboration. Thus far this collaboration has been largely absent.

We ask that serious consideration be given to our comments and the draft CAP revised to address our concerns as well as those of other local environmental groups who will be submitting recommendations we support. These include the Sierra Club, Environmental Council of Sacramento, and 350 Sacramento.

In reviewing the Draft #1 CAP, we rely in part on certain regulatory requirements in our analysis and state guidance provided by the Governor's Office as follows:

1. Regulatory Requirements:

14 CCR § 15183.5 sets forth the requirements for a CAP. It states:

(b) Plans for the Reduction of Greenhouse Gas Emissions. Public agencies may choose to analyze and mitigate significant greenhouse gas emissions in a plan for the reduction of greenhouse gas emissions or similar document. A plan to reduce greenhouse gas emissions may be used in a cumulative impacts analysis as set forth below. Pursuant to sections 15064(h)(3) and 15130(d), a lead agency may determine that a project's incremental contribution to a cumulative effect is not cumulatively considerable if the project complies with the requirements in a previously adopted plan or mitigation program under specified circumstances.

(1) Plan Elements. A plan for the reduction of greenhouse gas emissions should:  
(A) Quantify greenhouse gas emissions, both existing and projected over a specified time period, resulting from activities within a defined geographic area;  
(B) Establish a level, based on substantial evidence, below which the contribution to greenhouse gas emissions from activities covered by the plan would not be cumulatively considerable;

- (C) Identify and analyze the greenhouse gas emissions resulting from specific actions or categories of actions anticipated within the geographic area;
- (D) Specify measures or a group of measures, including performance standards, that substantial evidence demonstrates, if implemented on a project-by-project basis, would collectively achieve the specified emissions level;
- (E) Establish a mechanism to monitor the plan's progress toward achieving the level and to require amendment if the plan is not achieving specified levels;
- (F) Be adopted in a public process following environmental review.

## 2. State Guidelines:

Chapter 8 of the General Plan Guidelines prepared by the Governor's Office of Planning and Research (OPR) (<https://opr.ca.gov/>) provides clear guidelines for CAPs which can be found at [https://www.opr.ca.gov/docs/OPR\\_C8\\_final.pdf](https://www.opr.ca.gov/docs/OPR_C8_final.pdf).

Here are our comments and recommendations regarding the Draft #1 CAP:

### 1. **The CAP Target Must be Based upon Carbon Neutrality by 2030.**

As we did in January, we once again commend the Board for enacting its recent climate emergency declaration in which it states it will take urgent action to become carbon neutral by 2030. However, Draft #1 CAP is at odds with this ambitious goal. Unlike its predecessor, Draft #1 CAP mentions the Climate Emergency Declaration and carbon neutrality only to say that it will not address carbon neutrality by 2030. Incredibly, Draft #1 CAP states that the Board's directive may be addressed a down the road (perhaps as late as 2030) when the CAP is updated. Specifically, at Page 4 it states:

The GHG reduction measures contained in Sections 2 and 3 of this CAP will allow for additional reductions to be achieved beyond 4.8 MT CO<sub>2</sub>e per capita forecast, further outpacing the 6 MT CO<sub>2</sub>e per capita recommended by CARB. Their associated quantified GHG reductions and carbon sequestration benefits will be essential for putting the County on the a path [sic] to achieving the objectives of the community 2030 carbon neutrality goal, established under the Board of Supervisors approved Climate Emergency Resolution, passed in December 2020. The carbon neutrality goal was passed after significant progress had already been made on climate planning activities for the County to adhere to 2030 Scoping Plan and SB 32. Thus, the County's current approach in this CAP is to maintain momentum and get reductions started sooner rather than later, **while providing flexibility for the CAP to be updated later to meet carbon neutrality objectives. Thus, the County's approach to carbon neutrality by 2030 is to proceed with GHG reduction and carbon sequestration measures under this CAP and then expand regional GHG reduction and carbon sequestration programs as part of an overall comprehensive CAP update. The CAP update will coincide with an anticipated update to the County's 2030 General Plan** and availability of further guidance on recommended GHG reduction and carbon sequestration measures for carbon neutrality to be included in updates to the California's Climate Change Scoping Plan and Natural and Working Lands Climate Smart Strategy. Emph. Added. Footnotes omitted.

This language indicates the County intends to wait to pursue a goal of 2030 carbon neutrality until the CAP and General Plan update in 2030.

The failure to outline a path to carbon neutrality in Draft #1 CAP is at complete odds with the Board's Climate Emergency Declaration which expressly states the CAP will outline the steps that the County will take to achieve carbon neutrality. The Board made clear that the County intended to take strong action on Climate Change in the CAP, but Draft #1 CAP fails to do so.

We request that the CAP be redrafted based on the goal of carbon neutrality by 2030, consistent with the policy decision and directives issued by the Board in December 2020.

## **2. The CAP Must Include Ambitious and Specific Goals to Address Land Use.**

That land use management is not listed as one of the greenhouse reduction strategies under Section 2 of the Current CAP is telling. While it is universally recognized that land use management and focusing on infill vs sprawling development is a key to reduction of GHG, Draft #1 CAP fails to implement one of its most effective tools to reducing GHG by ignoring this opportunity. The California Air Resources Board in a paragraph on Cross-Sector Interactions, clarifies: "more compact development patterns reduce per capita energy demands, while less-compact sprawl increases them."<sup>1</sup>

Senate Bill 375 requires CARB to develop and set regional targets for greenhouse gas (GHG) emission reductions from passenger vehicles. CARB has set regional targets, indexed to years 2020 and 2035, to help achieve significant additional GHG emission reductions from changed land use patterns and improved transportation in support of the State's climate goals, as well as in support of statewide public health and air quality objectives. Metropolitan planning organizations (MPOs) must prepare a sustainable communities strategy (SCS) that will reduce GHG emissions to achieve these regional targets, if feasible to do so.<sup>2</sup>

Not only does smart growth and infill reduce GHG, it promotes improved public health and air quality, something the County should also prioritize.

Other jurisdictions recognize the key role land use plays in addressing climate change and have made land use management one of their key strategies in their Climate Action Plans: Yolo County, Solano County, and City of San Francisco, among others.

The City of Sacramento recognizes the key role land use policies play in the reduction of GHG. Its first recommendation under Built Environment is Sustainable Land Use. As stated on page 16 of the Final Report of the Mayors' Commission on Climate Change:

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<sup>1</sup> [https://ww2.arb.ca.gov/sites/default/files/classic//cc/scopingplan/scoping\\_plan\\_2017.pdf](https://ww2.arb.ca.gov/sites/default/files/classic//cc/scopingplan/scoping_plan_2017.pdf), pg 67

<sup>2</sup> <https://ww2.arb.ca.gov/our-work/programs/sustainable-communities-program/regional-plan-targets#:~:text=CARB%20has%20set%20regional%20targets,health%20and%20air%20quality%20objectives>

Evidence on land use and driving shows that compact development will reduce the need to drive between 20 and 40 percent, as compared with development on the outer suburban edge with isolated homes, workplaces, and other destinations (according to Growing Cooler authors Reid Ewing, Keith Bartholomew, Steve Winkelman, Jerry Walters, and Don Chen). They propose it is realistic to assume a 30 percent cut in VMT with compact development. Making reasonable assumptions about growth rates, the market share of compact development, and the relationship between CO2 reduction and VMT reduction, smart growth could, by itself, reduce total transportation-related CO2 emissions from current trends by 7 to 10 percent as of 2050. This reduction is achievable with land-use changes alone. The authors calculate that shifting 60 percent of new growth to compact patterns would save 85 million metric tons of CO2 annually by 2030.

As a result of recognizing the significance of land use in addressing GHG, the Final Report of the Mayors' Commission on Climate Change recommends at page 24:

Built Environment Recommendation #1: Sustainable Land Use Support infill growth that is consistent with the regional Sustainable Communities Strategy to ensure: 90% of the cities' growth is in the established and center/corridor communities and is 90% small-lot and attached homes by 2040.

The County CAP must include the same kind of specific measures with regard to land use by the County. In addition, any measures regarding land use, must have specific targets and interim measures.

Draft #1 CAP offers up GHG 11 and 23 regarding infill development and potential sprawl. These two measures do nothing to address sprawl besides indicate that developers may have to pay a fee or offsets if their project cannot meet the required standards. GHG 11 and 23, do not require any interim monitoring between now and 2030 nor do they provide clear targets to be achieved. The County currently plans on approximately 103,000- dwelling units to be located on greenfield sites. These plans run afoul of efforts to curb GHG. Housing needs in our area can be met without the sprawl and increased GHG that will be created, should these developments go forward. The County's available infill capacity of 33,000 DU is almost enough to handle all SACOG-projected housing growth to 2040. The available infill capacity could accommodate SACOG's entire Regional Housing Needs Allocation of 27,200 DU for this decade. And it could easily accommodate more

than the 10,000 DU the County has proposed for the GHG-reducing Green Zones, which lie within infill areas.<sup>3</sup>

The County should freeze development on greenfield sites and instead use existing infill capacity to meet housing needs. Only decisive action will result in sustainable land use policies that will address climate change in our region. At a minimum, the CAP should set a specific commitment to infill development and not offer offsets to cure the problem of sprawl. If any offsets are allowed, they must be local and prioritize marginalized communities.

**3. The CAP Must Include more Specific and Measurable Strategies/Measures to Address GHG Emitted by Vehicles on the Road.**

Figure E-7 (found in the final Appendix of Draft #1 CAP) is very telling. It identifies the sources of GHG starting in 2015 and sets forth the anticipated reductions in each source by 2030. Not surprisingly, on road vehicles are by far the largest source of GHG in 2015. However, the draft CAP shows virtually no reduction in GHG from this source by 2030. This is a lost opportunity. The failure of the CAP to meaningfully address land use and to set forth a comprehensive transportation plan that will take more cars off the road will result in not only a failure to address climate change, but worsening air quality and a negative impact on public health. The CAP must include clear and broad measures to use transportation (both active and shared) to the fullest extent possible in Sacramento County to reduce GHG by taking cars off the road. These measures must be followed up with implementation steps, targets, and methods for monitoring the progress on the measure. In addition, no master plans should be approved until there are meaningful transportation options. Land use and transportation go hand in hand and that is one of many reasons why infill makes sense, namely, compact developments located near public transportation hubs.

The CAP must include more ambitious and specific strategies and measures to reduce the GHG from vehicles on the road through establishing comprehensive transportation and land use policies that work hand in hand.

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1	Sacramento County 2030 General Plan 2020 Annual Report, ATT 2 - pg. 3. Annual Housing Element Progress Report, Appendix A, Table B Regional Housing Needs
2	SACOG Green Means Go, Locally Nominated Green Zones, updated 12/4/20
3	SACOG RHNP REGIONAL HOUSING NEEDS PLAN 2013–2021, Executive Summary Table 1 - Allocations - Total and by Income Category, pg. 5
4	SACOG Regional Housing Needs Plan Cycle 6 (2021-2029), Adopted March 2020, pg. ES-3
5	Sacramento County 2030 General Plan 2020 Annual Report, County Growth, Infill, pg. 11
6	SACOG 2020 MTP/SCS, Appendix C: 2020 MTP/SCS Land Use Forecast, pg. 12, Preferred Scenario GROWTH 2016-2040
7	Sacramento County 2030 General Plan 2020 Annual Report, ATT-1, Table 3, Land Use Summary for Approved Growth Areas, pg. 15
8	Sacramento County 2030 General Plan 2020 Annual Report, ATT-1, Table 4 Land Use Summary for Pending Master Plans, pg.15

**4. The CAP Should Not make SMUD'S Goals Such a Key Aspect of the County's GHG Reduction and Must Include Specific Measures to provide for Electrification of New and Existing buildings-Both Residential and Commercial.**

Draft #1 CAP places much reliance on SMUD's commitment to carbon free electricity generation. While SMUD's actions to create carbon free electricity generation is absolutely the right decision, it is not at all clear that SMUD will be able to reach these goals. Whether or not SMUD can reach these goals, the Draft #1 CAP places too much reliance on SMUD reaching these goals, rather than taking the specific County actions needed to reduce the County's GHG.

If SMUD does realize its goals, the reduction in GHG emissions resulting from SMUD's action will only occur if residences and business are using the electricity generated by SMUD. Many rely on natural gas. Measures GRN-03 in the Administrative Draft of the CAP and GHG-07 in Draft #1 CAP speak to the electrification of buildings (Both are set forth below.) Both identify 2023 as the year when new residential buildings will be all-electric. Why not sooner? Absent any explanation for this date, the selection of 2023 appears arbitrary. The City of Sacramento is moving forward on electrification and it appears it will be implemented in 2021, potentially two years before the County. The County and City should be on the same schedule.

In addition, potential GHG reduction from this change has changed from 113,324 to 66,964 between the Administrative Draft and the Draft #1 CAP. There is no explanation for this almost 50% reduction in potential savings in GHG. This sudden and significant change in savings makes one question the data in Draft #1 CAP. The only target indicator for GHG-07 is the adoption of the ordinance; there is no effort to confirm the actual savings in GHG or otherwise determine whether the implementation has been effective.

Administrative Draft:

MEASURE GHG-03: ELIMINATE FOSSIL FUEL CONSUMPTION IN NEW RESIDENTIAL BUILDINGS The County will develop and adopt a building code requiring all new single-family and multi-family residential buildings obtaining building permits after January 1, 2023 to be designed as all-electric buildings. Target Indicators □ The Sacramento County Building Department will deny building construction and occupancy permits for all new projects that do not comply with the described reach code. GHG Reduction Potential: **113,324 MTCO<sub>2</sub>e/year by 2030.** Emph. Added.

Draft #1 CAP

MEASURE GHG-07: ELIMINATE FOSSIL FUEL CONSUMPTION IN NEW RESIDENTIAL BUILDINGS Measure: Require all new residential construction in the County to be all-electric. Implementation: The County will develop and adopt an energy reach code requiring all new single-family and multi-family residential buildings obtaining building permits after January 1, 2023 to be designed as all-electric buildings. Responsibility: SM and BP&I Timeframe: Mid-term. GHG Reduction Potential: **66,964 MT CO<sub>2</sub>e per**

**year by 2030.** Sector: Building Energy Target Indicator: Adoption of a reach code prior to 2023. All new residential buildings all-electric after January 2023. Emph. Added.

As to existing residential buildings, the Draft #1 CAP indicates under GHG-06

The County will assist local utilities with increasing participation in residential retrofit programs to achieve a reduction in energy consumption. Implementation: These retrofits will involve upgrading to EnergyStar™-certified appliances, more efficient HVAC systems, weatherization, and comprehensive whole home retrofitting. The County will develop and implement a program that provides education on strategies that enable residential energy conservation. Videos featuring energy savings tips will be recorded and hosted on the County's website and a marketing campaign will be developed to advertise the availability of this information. A video shall also be created that shows residents how to monitor their energy use through SMUD and PG&E web interfaces or share their energy use with third parties for more detailed analytics on energy use. Responsibility: PER and BP&I via the BAC with PIO support Timeframe: Mid-term GHG Reduction Potential: 177,187 MT CO2e per year by 2030. Sector: Building Energy Target Indicator: Develop outreach program with an objective to have 25 percent of existing residences participate in energy efficiency upgrades by 2030.

Draft #1 CAP only commits to the development of an undefined outreach program for retrofit of existing residential units. The Draft #1 CAP indicates that 177,187 MT CO2d per year could be saved under this measure, but does nothing to measure that savings nor does it commit itself to anything meaningful such as funding of retrofits and/or requiring retrofits when remodeling and/or selling units. This is simply inadequate.

Regarding existing commercial buildings, under GHG-04, Draft #1 CAP states only

The County will develop a program aimed at assisting local utilities with implementing commercial energy efficiency and electrification programs to achieve reductions in energy consumption

The implementation of this measure is for the County to launch an outreach program with an objective to have 25 percent of commercial buildings participate in energy efficiency upgrades by 2030. There is nothing more to this proposal and no plan as to how or when the 25 percent goal will be reached much less monitored.

There is also nothing in Draft #1 CAP mandating new commercial to be all electric. This is a significant gap in the document. The City of Sacramento is already working on an ordinance that will include new commercial buildings in its electrification efforts as have numerous other jurisdictions. The County must do likewise.

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## 5. The CAP Must Include Additional Reduction Targets Beyond 2030.

The Draft #1 CAP identifies a target for 2030, with no additional targets beyond 2030. Such an approach does not follow the recommendations of the OPR which points out how setting only one near target can cause inaccurate assessments of the plan. The guidance states:

**Selecting a single reduction target year does not typically allow an agency to accurately assess the trajectory of the plan.** Given the long-term nature of the effects of climate change, understanding the effects of the plan on long-term emissions reductions is necessary to determine whether the plan will reduce emissions to a less than significant level. Examining the long-term trajectory also allows a lead agency to determine whether the emissions reductions in the plan are sustainable, or will be overtaken by population growth, increased driving, or other shifts in emissions. Take for example, a plan that sets only a near-term target. Such a plan might rely on increasing building energy efficiency to achieve near-term goals. Looking further out, however, might demonstrate that steady increases in vehicle miles traveled will counteract those reductions, and result in an emissions trajectory that increases rather than decreases. Setting targets out to the general plan horizon year or beyond allows a lead agency to consider the full suite of measures that might be necessary to achieve long-term reduction goals. See [https://www.opr.ca.gov/docs/OPR\\_C8\\_final.pdf](https://www.opr.ca.gov/docs/OPR_C8_final.pdf) at pages 226-227.

## 6. The CAP Must Identify Target Indicators for all Measures.

Section 2 of Draft #1 CAP identifies five strategies to reduce community emissions to the target level. Under each strategy there are measures defined as, “a program, policy, or project the County will implement that will cause a direct and measurable reduction in GHG emissions.” Under about 1/3 of the measures there are “target indicators” which Draft #1 CAP defines as “the performance metric by which achievement will be measured in target years.”

The vast majority of the measures identified in Draft #1 CAP are drafted in skeletal fashion and need to be fleshed out, including implementation steps, targets, and interim measures. Simply saying the County will launch educational programs or place something on its website, does not constitute meaningful action to implement the measures proffered. In addition, the majority of the measures identified in Draft #1 CAP are worded in such terms that indicate the County will support, encourage, and incentivize certain actions. Using these vague terms means the success or failure of these measures is not measurable or verifiable. That these are not measurable is further illustrated by the fact that very few measures have “target indicators.” Approximately 1/3 of the measures have any performance metric designed to measure performance. Without target indicators there is no way to assess whether the measures are being implemented and whether the projected results are being realized. Many of the target indicators included are also vague and not true indicators of whether the measure and/or its implementation have succeeded.

Under 14 CCR § 15183.5 (B) (1)(B) the plan must: “Specify measures or a group of measures, **including performance standards**, that substantial evidence demonstrates, if implemented on a project-by-project basis, would collectively achieve the specified emissions level...” Emph. Added.

This requirement is also discussed by the OPR guidelines:

Feasibility and Enforceability CEQA Guidelines sections 15168(b)(4) and 15168(c)(3) recognize that programmatic documents like a general plan or CAP provide an opportunity to develop mitigation plans that will apply on a project-specific basis. As a result, a CAP needs to include measures that will achieve the reduction target. How the plan achieves those targets, whether through mandatory or a mix of voluntary and mandatory measures, is up to the lead agency, so long as substantial evidence supports the conclusion. When addressing greenhouse gas emissions, like all other technical analysis, the methodology and calculations should be transparent and replicable with the goal of providing substantial evidence supporting the assumptions, analysis and conclusions. **Measures should also be real and verifiable, through either full enforceability or through substantial evidence in the record supporting an agency's conclusion that mitigation will be effective.** A number of published court cases address the need for feasible and enforceable emission reduction measures.

The decision in *Communities for a Better Environment v. City of Richmond* (2010) 184 Cal. App. 4th 70, provides guidance on the level of detail that is needed. In that case, the city proposed to mitigate the effects of a refinery project by developing an emissions reduction plan after project approval. Specifically, the city pledged to implement measures that would ensure no net increase in emissions from the refinery. The EIR for the refinery suggested several possible measures, including energy efficiency upgrades and carbon sequestration. On appeal, the court held that the city's mitigation plan was inadequate. Specifically, the court found: "...The final EIR merely proposes a generalized goal of no net increase in greenhouse gas emissions and then sets out a handful of cursorily described mitigation measures for future consideration that might serve to mitigate the 898,000 metric tons of emissions resulting from the Project. No effort is made to calculate what, if any, reductions in the Project's anticipated greenhouse gas emissions would result from each of these vaguely described future mitigation measures. Indeed, the perfunctory listing of possible mitigation measures ... are nonexclusive, undefined, untested and of unknown efficacy." (*Communities for a Better Environment*, supra, 184 Cal.App. 4th at 93). The court observed that to be adequate, a plan should include measures that are "known to be feasible", **"coupled with specific and mandatory performance standards to ensure that the measures, as implemented, will be effective"** (Id. at p. 94).

Consistent with the regulation and OPR guidance, all of the measures identified in the CAP include target indicators. If it is impossible to provide a target indicator, the measure needs to be rewritten in a more specific way that will allow for evaluating implementation, effectiveness and to allow for accountability.

## **7. The CAP Must Set Target Indicators between Now and 2030.**

Section 15183.5(b) (1) (e) states CAPS should, "Establish a mechanism to monitor the plan's **progress** toward achieving the level and to require amendment if the plan is not achieving specified levels." Emphasis Added.

The very few target indicators in Draft #1 CAP are almost all indicators measured in 2030. To monitor progress towards the 2030 goals, specific target indicators should be set for time periods between now and 2030. If there is no monitoring of the progress made between now and 2030, the County will not know whether the measure is being implemented or if other actions need to be taken to reach the goal set in 2030. Section 15183.5 clarifies these interim measures are needed to determine whether the plan needs amendment if it is not achieving specified levels.

In addition, the Board must be updated at regular intervals no less frequent than every 60 days on the progress on these various goals. There are really no teeth in the document if there is no accountability for anything until 2030 and there are no markers to measure effectiveness.

#### **8. Appearance of a Conflict of Interest if Developers are Paying Ascent.**

It is our understanding that developers are being asked to pay for the preparation of the CAP by the consultant Ascent. As a completed CAP allows developers to streamline the environmental process for future projects, developers substantially benefit from its preparation. The County must be sensitive to any appearance that developers are in the driver's seat on the CAP.

The Board has made clear the CAP is to be the mechanism the County will use to reach carbon neutrality by 2030. Because Draft #1 CAP is so far from reaching that goal, there is the appearance the developers could be exerting undue influence in its preparation. If developers are paying for Ascent, it would be in the developers' interest to make the process short to save money and place fewer limits on development projects.

Our members and the public at large need to be assured that if developers are paying for the CAP to be prepared, developers are not directing its contents. The best way to cure this conflict of interest is to have the County pay for the CAP. Assuming there are no funds available, there are grants available to local governments to fund preparation of CAPS (<https://fundingwizard.arb.ca.gov/web/>).

The County is slated to receive \$300 million in stimulus aid this year. Some of this money can fund not only the CAP but investments in transportation and other needs facing our community.

Finally, the appearance of rushing the CAP process ignores the fact that if not done correctly, or if there appears to be undue developer influence, the CAP could generate litigation. Our interest is that the County create a meaningful and effective CAP that benefits all citizens.

Thank you for the opportunity to comment on the Draft #1 CAP. We are happy to discuss our recommendations with you further and answer any questions.

We urge the County to act boldly and decisively to address climate change in our region and to follow the clear directives provided by the Board in its December 2020 Climate Emergency Declaration. Our future and that of our children depend on it.

Sincerely,

/s/

Edith Thacher  
Chapter Lead, Sacramento Chapter, CCL

/s/

Jill C. Peterson  
Volunteer, Sacramento Chapter, CCL

**Taylor. Todd**

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**From:** Laurel Hollis <info@email.actionnetwork.org>  
**Sent:** Thursday, April 8, 2021 9:39 AM  
**To:** PER. climateactionplan  
**Subject:** Climate Action Plan

**EXTERNAL EMAIL:** If unknown sender, **do not** click links/attachments.

Public Comment,

Thank you for your commitment to improve life for all in our county. I live four blocks away from Highway 50 in Land Park. A strong Climate Action Plan will reduce vehicle noise and pollution in my neighborhood. I have a daughter who had to leave the area because she has asthma, which was very sad for me. I used to live in Carmichael, where there was almost no public transit. The current CAP doesn't align with the county's own Climate Emergency Declaration, or offer enough specific funding sources and recommendations for partnerships. This draft is a start, but needs work. I hope you'll listen to the public, and allow ample opportunities to your constituents to weigh in. At this time of dire consequences, there is no time for half measures.

Laurel Hollis  
hollislaurel@gmail.com  
2665 13th street  
sacramento CA , California 95818

## Taylor. Todd

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**From:** stensheri@comcast.net  
**Sent:** Thursday, April 8, 2021 2:37 PM  
**To:** PER. climateactionplan  
**Subject:** Draft Climate Action Plan comment

**EXTERNAL EMAIL:** If unknown sender, **do not** click links/attachments.

Dear Planning and Environmental Review Staff,

I'm happy to see the development of the Climate Action Plan for the County and appreciate the opportunity to review and comment.

I have two comments:

- 1) Regarding MEASURE GHG-07: ELIMINATE FOSSIL FUEL CONSUMPTION IN NEW RESIDENTIAL BUILDINGS. I don't support the 100% electrification of new residential homes. I think it sets up the county and the cities located within it to experience increased strain on the electrical grid and a return to rolling blackouts, as well as increased energy use rates. The state requirement to include solar on new homes definitely should help, but I think we should also consider working with PG&E to use waste from the landfills, wastewater treatment plants, and Ag industry to work on converting from natural gas to renewable natural gas. This type of partnership should ultimately be both an economical and environmental benefit for the County, PG&E and county residents. This link to a presentation for a similar effort in SoCal. [Getting the Facts on Renewable Natural Gas \(epa.gov\)](#)
- 2) Include renewable energy battery storage at existing buildings and residential properties, and not just for new construction. I also think there should be goals to create net zero neighborhoods where new solar PV is being installed and to incentivize existing neighborhoods. These neighborhoods could also use neighborhood solar power plants with storage power to connect to, reducing the need for transmission lines. Park and school parking areas could be used to build these solar facilities and/or perhaps built near existing substations.

Sincerely,

Sheri Lasick  
5235 Fawn Crossing Way  
Antelope, Ca 95843

## Taylor. Todd

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**Subject:** Sac Climate Organizers might find this online meeting of interest

From: E Durbrow <durbrow@gmail.com>  
Sent: Thursday, April 8, 2021 3:01 PM  
To: PER. climateactionplan <climateactionplan@sacounty.net>  
Subject: Sac Climate Organizers might find this online meeting of interest

EXTERNAL EMAIL: If unknown sender, do not click links/attachments.

This is via the Google CDR listserv. I thought the planners might be interested in refining measures to encourage (and measure) carbon capture in the county... Just FYI.

<https://www.urbangreencouncil.org/content/events/carbon-dioxide-removal-and-city>

CARBON DIOXIDE REMOVAL AND THE CITY

APRIL 29, 2021

10:00 TO 11:30 AM

1 0 3

REGISTER

ALSO ON THIS DATE

CRUSHING THE CODE NYS: COMMERCIAL

EVENT PRICES:

Non-member

\$20

Member

\$10

Sponsor and Organizational Member

Free Admission

Trust and Leadership Level Member

Free Admission

Carbon Dioxide Removal and the City

According to the U.N. IPCC (October 2018), carbon dioxide removal (CDR) on a massive scale will be necessary to limit global temperature change to 1.5°C this century. Growing attention to this has focused mainly on a handful of nature-based and industrial solutions that appear to be decidedly un-urban in their footprint, operation and logistical demands.

But cities have historically provided critical early habitats for innovations that ultimately attain transformational scale far beyond their borders. Indeed, today's urban centers are leading some of the most creative, serious and impactful responses to the climate crisis.

What role might cities play in fostering early niche markets and proving grounds for promising CDR applications and companies? Furthermore, how might CDR help climate-forward cities like New York achieve their long-term emissions reductions goals? In this panel discussion, pioneering CDR entrepreneurs and thinkers from around the world will present a series of (near) future-focused CDR use cases for the urban environment.

Previous

Next

MODERATOR

Jamie Rogers

Senior Advocate, The OpenAir Collective

**SPEAKERS**

Jia Li

Co-Founder and Chief Scientist, Carbon Infinity

Chris Neidl

Policy Analyst, Carbon 180

Josh Santos

CEO, Noya

Doug Staker

VP, Business Development, Carbon Quest

Bob Wilson

VP of Commercialization, AirCapture

## Taylor. Todd

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**From:** Susan Solarz <solaking19@gmail.com>  
**Sent:** Thursday, April 8, 2021 3:48 PM  
**To:** PER. climateactionplan; Supervisor Serna; Kennedy. Supervisor; Rich Desmond; Frost. Supervisor; Nottoli. Don  
**Cc:** Laurie Heller  
**Subject:** Comments on Sacramento County Draft Communitywide Climate Action Plan (CAP)- Public Participation and Environmental Justice  
**Attachments:** Solarz -Heller CAP Comment FINAL.docx

Comments on the draft CAP are provided below and attached.

To: Sacramento County Office of Planning and Environmental Review

Supervisor Phil Serna

Supervisor Patrick Kennedy

Supervisor Rich Desmond

Supervisor Sue Frost

Supervisor Don Nottoli

From: Susan Solarz (District 3) and Laurie Heller (District 2)

Re: Sacramento County Draft Communitywide Climate Action Plan (CAP) - Public Participation and Environmental Justice

As members of 350 Sacramento, we have both been engaged in County's CAP development process since 2017. We are very pleased to see the project moving forward. However, *current* public participation in the process is insufficient for the scope of the problem – and the scope of the necessary solutions. Consideration of environmental justice must also be an integral and enhanced focus in the CAP. Disadvantaged communities – who suffer disproportionate harm from climate change impacts - must have the opportunity to fully participate in solutions.

Public workshops held by the County in 2016 and 2017 are out-of-date and therefore irrelevant to the current CAP. Climate change has progressed, climate science has moved on, new solutions are available – and the CAP needs to reflect that.

Unfortunately, this draft of the CAP is the *first* opportunity for the public to review the County's specific proposed measures to address climate change. We believe that a more robust outreach effort is necessary, including

- A review period of a at least 60 days; and
- Multiple public workshops at different locations and times of day/evening.

The CAP will have wide ranging importance to our community. A public comment period of only 30 days with only one public (zoom) meeting stands in contrast to the public comment and outreach for other environmental documents – with arguably less broad public impact. (For instance, the Natural Resources Management Plan for the American River Parkway had a comment period of 60 days.)

The County committed to significant public engagement when it adopted the *Climate Emergency Declaration Resolution*, which states:

“The County of Sacramento affirms the community's need to understand, participate and support all actions and initiatives the County adopts in response to the climate emergency. The County therefore commits to support outreach, information and education for County residents and staff on the urgent need to reduce GHG emissions, and the policies and strategies necessary to advance sustainability and resilience.

A robust community engagement process:

- 1) Identifies existing conditions, issues, and opportunities throughout the county, including potential barriers to implementation;
- 2) Informs the plans' vision and guiding principles and shape strategies in a way that responds to community needs;
- 3) Reaches out to youth, who have a particular stake in the climate crisis and will need to sustain, accelerate and expand solutions as climate change worsens.
- 4) *Continues* to solicit stakeholder feedback to maintain the balance of environmental leadership, social equity and economic prosperity.
- 5) Partners with the many jurisdictions *within the County* – and the County's regional neighbors – which are currently developing their own Climate Action Plans.

The County alone cannot safeguard communities from the worsening impacts of climate change. Community Engagement is needed to inform planning, *and* to ensure buy-in and long-term commitment from stakeholders. In fact, the County committed to do this when it adopted the *Climate Emergency Declaration Resolution*, which states:

“Implementation of the County's climate efforts shall include the engagement of community-based and grassroots organizations and inclusive economic development partners, with a focus on low-income and disadvantaged communities, youth, communities of color, and environmental justice.”

Robust community engagement is necessary to co-create adaptation strategies and implementation measures that preserve community culture, provide local economic growth opportunities, and create a sense of shared ownership and responsibility for community resilience.

Although we applaud the *Environmental Justice Element* published by the County in response to the *General Plan* update, we do not see these priorities reflected in the CAP. The Environmental Justice element must be implemented in the targeted neighborhoods (North Highlands, West Arden-Arcade, South Sacramento, North Vineyard) by including *specific elements pertaining to environmental justice* in the CAP.

- The CAP must deliver public health *and* resilience benefits by *directly* addressing the impacts of climate change that these communities are *already* grappling with – such as the need for affordable housing, clean mobility, access to healthy food, parks and green space. The CAP should promote mitigation and adaptation policies that provide health benefits and adaptive capacity, such as active transportation, mixed use zoning, energy-efficient housing, and urban greening.
- We strongly support the inclusion of measure GHG-02 (Urban Forestry) as an element in the CAP as a near-term priority. We stress that the planting of shade trees in the identified Environmental Justice communities is essential not only to reduce greenhouse gas emissions but also as a significant adaptation measure to reduce the potential for heat-related illnesses in these communities.
- The CAP must develop and implement transportation systems and built environments that are accessible to people of all ages, sizes and abilities, to ensure marginalized communities can participate in and access the benefits of climate action strategies.

Vulnerable Populations (people experiencing homelessness, low-income households, people with disabilities, and communities of color) have historically borne the greatest burden from the effects of pollution and disinvestment. They remain on the front lines of climate change. Residents are more likely to have pre-existing health conditions and less access to health care. With fewer neighborhood parks and tree-lined streets, these populations are more susceptible to the stress of increasing heat. *Needs such as these must be called out and solutions clearly identified and prioritized in the CAP, to ensure the CAP advances environmental justice.*

Because we are all experiencing climate change, we are all responsible for climate action.

Thank you for your consideration of our comments.

**Taylor. Todd**

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**From:** Kari Bauer <info@email.actionnetwork.org>  
**Sent:** Thursday, April 8, 2021 5:08 PM  
**To:** PER. climateactionplan  
**Subject:** Sac Co Climate Acton Plan Draft

**EXTERNAL EMAIL:** If unknown sender, **do not** click links/attachments.

Public Comment,

Climate Change has hit us especially hard in the Central Valley where we suffer from poor air quality due to forest fires as well as use of fossil fuels to power vehicles along the I-5 corridor. Sacramento County must do it's part to lower greenhouse gas (GHG) emissions.

We need a serious effort to address Climate Emergency Declaration (CED) direction in the CAP. The CED presents both specific directions and a challenging goal. SMUD is addressing a similarly challenging goal in a professional and responsible manner, while the CAP just 'kicks the can down the road'.

Re: Infill development, we need Policy measures that actually prioritize infill before sprawl development.

Re: Carbon Offsets: Please include Justification for allowing offsets at all instead of requiring direct GHG-reductions; clarification of proposed offset funding and implementation; and commitment to keeping offset funds local and available to reduce GHG emissions and provide co-benefits to environmental justice communities.

We also need full community support - opportunity for the general public to hear about and informally express views on the CAP before formal presentations for adoption.

Sincerely, Kari Bauer, Carmichael

Kari Bauer  
Grandmakari@gmail.com  
4856 Paisley Way  
Carmichael, California 95608

## Taylor. Todd

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**From:** CJ <cjmeakes@gmail.com>  
**Sent:** Thursday, April 8, 2021 9:45 PM  
**To:** PER. climateactionplan  
**Cc:** Kennedy. Supervisor  
**Subject:** CAP comments

**EXTERNAL EMAIL:** If unknown sender, **do not** click links/attachments.

Hello -

Thank you for the opportunity to comment on the Sacramento County Draft Climate Action Plan. Below are my comments.

Thank you,

C.J. Meakes

Comments:

1. Section 1.2 Table 1. The 2030 forecast emissions for Government operations (109,172 MTCO<sub>2</sub>e) does not come close to meeting the SB 32 reduction target of 73,348 MTCO<sub>2</sub>e presented in Table 2-7 on page E-7. This plan needs to describe how the county will meet it's legally mandated targets.
2. Section 1.3 - With the Counties goal of carbon neutrality by 2030, this plan seems to fall far short. While it is understood that another plan is coming, after further knowledge resources are made available, given the tight deadline, there needs to be a schedule that is proposed to be adhered to. It is 2021, only 9 years from the goal of carbon neutrality, and these reports can take a year or more to finalize, so it needs to be called out here when the updated plan will be completed.
3. Measure GHG-07: This deadline should be sooner. There is no reason to continue installing technology we know will not be sustainable or acceptable in 9 short years. The best time to convert is before construction is done, even if it means updating existing plans.
4. GHG-10: These installations of electric vehicle infrastructure should start in the near term, not the long term. There also should be a focus on getting landlords, especially of multi-unit properties, to install electric vehicle charging infrastructure.
5. GHG-17: This should be a mid term goal, not long term. Focus should be on providing bicycle lanes with physical barriers from vehicle traffic, and that are direct paths to destinations. Experience in places with widely used bike infrastructure shows that a focus on safety and convenience are necessary to ensure widespread adoption. Would you feel comfortable with your 5 year old and your grandma riding on it? If so, then people will use it. Otherwise only a few hardy people who feel super comfortable on a bike will use it. Also, if it makes you go out of your way, people will be less likely to use it.
6. GHG-19: The standard for EV parking should be at least 30%, or include specification for rapid chargers, otherwise these would not be reliably available for residents. Also, this measure (or another) needs to provide for secure bicycle parking as part of the code, such as at least 1 secure spot per two apartments.
7. GHG-20 This seems to have a lot of overlap with GHG-15-17
8. GHG-21 - As mentioned for GHG-17, these need to include planning for physically separated bicycle pathways.
9. GHG-22 This scoring system needs to take into account the accessibility of the bike lane: a better score for a physically separated bike lane, a middling score for a bike lane on a low traffic and low speed road, and worse scores for bike lanes on higher vehicle traffic and/or speed roads. Some bike lanes are so unsafe they are not and will not be used by many people, and thus should not be scored the same as better routes.
10. GOV-EC-4: This should be a short term goal, not a mid term goal
11. GOV-FL-01: All newly purchased county vehicles should be electric, effectively immediately, unless the vehicle is for a specific purpose that cannot be met with currently available EVs. Then alternatives, such as a plug in hybrid, should be the next alternative.

12. GOV-FL-02 Burning of CNG in vehicles, from any source, needs to be eliminated by 2030 to the maximum extent possible, and language of this fact should be included here.
13. GOV-FL-03 Burning of diesel in vehicles, from any source, needs to be eliminated by 2030 to the maximum extent possible, and language of this fact should be included here.
14. GOV-WA-02 Should part of this be an analysis of switching from turf to native xeriscaping?
15. Section 2.4 These measures should also be numbered and details provided like the other measures
16. Section 2.5 A date needs to be provided as to when this General Plan or CAP update will occur. Also, the actions being investigated by others described in this section seem to largely have to do with land management. Given that, and the goal of carbon neutrality by 2030, it makes sense that this CAP needs to cover all the bases it can as thoroughly and aggressively as possible. As my multiple comments above illustrate, this CAP needs to be strengthened significantly now.
17. FIRE-07 there should be a FIRE-07 which addresses HVAC systems and plans in county owned buildings for during heavy smoke events, and provides education and resources for local schools, businesses, and residents to adequately filter and keep their indoor air clean during bad air quality days due to fire in surrounding areas.
18. WATER-04 - this should include fire safe xeriscaping of county and CalTrans properties, to get away from the water intensive turf mentioned in GOV-WA-02
19. FLOOD-15: There needs to be county requirements created that accurate, up-to-date, specific flood risk information is communicated to renters and buyers of properties prior to lease/purchase agreement.
20. Ch 4 - Per the December Climate declaration, the Climate Emergency Mobilization Task Force was supposed to be set up by the end of February 2021, so initial members and framework for this task force and their oversight of CAP implementation should be included in the CAP.
21. Ch 4 -There should be a description here of the Counties plan and schedule to hire the staff necessary to implement the CAP.

## Taylor. Todd

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**From:** Susan Solarz <solaking19@gmail.com>  
**Sent:** Thursday, April 8, 2021 11:45 PM  
**To:** PER. climateactionplan  
**Cc:** Rich Desmond  
**Subject:** Additional Comments on Sacramento County Draft Communitywide Climate Action Plan (CAP)- Public Participation and Environmental Justice

**EXTERNAL EMAIL:** If unknown sender, **do not** click links/attachments.

Together with Laurie Heller, I previously provided comments pertaining to public participation and environmental justice (forwarded).

The following are my additional comments:

1. Greenhouse gas (GHG) reduction measures in the CAP should be targeted toward **Climate Emergency Declaration resolution goals of carbon neutrality by 2030. These goals should not be delayed to a future CAP update.** Consistent with this declaration, "*County staff shall evaluate the resources necessary to achieve carbon neutrality by 2030, and the emergency actions required to eliminate emissions by 2030. Where existing funding or resources do not support the level of action required, County staff shall identify gaps and provide recommendations to the County Executive and Board of Supervisors.*" The County should also move expeditiously to establish the Climate Emergency Task Force identified in the resolution.
2. The CAP should prioritize **land use** policies to **reduce urban sprawl** with emphasizing **infill** development should be emphasized to reduce transportation emissions, the largest source of greenhouse gases in our area. The CAP should strengthen the requirement that development should not be outside the urban boundary and promote habitat.
3. **Carbon offsets should be an exception, and when allowed, there should be a commitment to keeping offset funds local** and available to reduce GHG emissions and provide co-benefits to environmental justice communities.
4. I question the validity of GHG-01, Carbon Farming, to achieve the identified reduction in GHG emissions. The assumptions of available land and willing farmers appears to be far-fetched.
5. Sacramento County should collaborate with its regional neighbors, including the City of Sacramento, in developing and implementing the CAP.
6. Measures in the CAP should identify specific quantifiable indicators/milestones to provide a basis for assessments.

Thank you for taking urgent action on this serious matter.

Sincerely,

Susan Solarz, District 3  
Member, 350 Sacramento CAP Outreach Team  
1260 Los Rios Dr, Carmichael, CA 95608  
916-212-9265

----- Forwarded message -----

**From:** Susan Solarz <[solaking19@gmail.com](mailto:solaking19@gmail.com)>  
**Date:** Thu, Apr 8, 2021 at 3:48 PM  
**Subject:** Comments on Sacramento County Draft Communitywide Climate Action Plan (CAP)- Public Participation and Environmental Justice  
**To:** <[ClimateActionPlan@saccounty.net](mailto:ClimateActionPlan@saccounty.net)>, <[SupervisorSerna@saccounty.net](mailto:SupervisorSerna@saccounty.net)>, <[SupervisorKennedy@saccounty.net](mailto:SupervisorKennedy@saccounty.net)>, <[richdesmond@saccounty.net](mailto:richdesmond@saccounty.net)>, <[SupervisorFrost@saccounty.net](mailto:SupervisorFrost@saccounty.net)>, <[nottolid@saccounty.net](mailto:nottolid@saccounty.net)>  
**Cc:** Laurie Heller <[laurierivlinheller@gmail.com](mailto:laurierivlinheller@gmail.com)>

Comments on the draft CAP are provided below and attached.

To: Sacramento County Office of Planning and Environmental Review

Supervisor Phil Serna

Supervisor Patrick Kennedy

Supervisor Rich Desmond

Supervisor Sue Frost

Supervisor Don Nottoli

From: Susan Solarz (District 3) and Laurie Heller (District 2)

Re: Sacramento County Draft Communitywide Climate Action Plan (CAP) - Public Participation and Environmental Justice

As members of 350 Sacramento, we have both been engaged in County's CAP development process since 2017. We are very pleased to see the project moving forward. However, *current* public participation in the process is insufficient for the scope of the problem – and the scope of the necessary solutions. Consideration of environmental justice must also be an integral and enhanced focus in the CAP. Disadvantaged communities – who suffer disproportionate harm from climate change impacts - must have the opportunity to fully participate in solutions.

Public workshops held by the County in 2016 and 2017 are out-of-date and therefore irrelevant to the current CAP. Climate change has progressed, climate science has moved on, new solutions are available – and the CAP needs to reflect that.

Unfortunately, this draft of the CAP is the *first* opportunity for the public to review the County's specific proposed measures to address climate change. We believe that a more robust outreach effort is necessary, including

- A review period of at least 60 days; and
- Multiple public workshops at different locations and times of day/evening.

The CAP will have wide ranging importance to our community. A public comment period of only 30 days with only one public (zoom) meeting stands in contrast to the public comment and outreach for other environmental documents – with arguably less broad public impact. (For instance, the Natural Resources Management Plan for the American River Parkway had a comment period of 60 days.)

The County committed to significant public engagement when it adopted the *Climate Emergency Declaration Resolution*, which states:

“The County of Sacramento affirms the community's need to understand, participate and support all actions and initiatives the County adopts in response to the climate emergency. The County therefore commits to support outreach, information and education for County residents and staff on the urgent need to reduce GHG emissions, and the policies and strategies necessary to advance sustainability and resilience.

A robust community engagement process:

- 1)** Identifies existing conditions, issues, and opportunities throughout the county, including potential barriers to implementation;
- 2)** Informs the plans' vision and guiding principles and shape strategies in a way that responds to community needs;
- 3)** Reaches out to youth, who have a particular stake in the climate crisis and will need to sustain, accelerate and expand solutions as climate change worsens.
- 4)** *Continues* to solicit stakeholder feedback to maintain the balance of environmental leadership, social equity and economic prosperity.
- 5)** Partners with the many jurisdictions *within the County* – and the County's regional neighbors – which are currently developing their own Climate Action Plans.

The County alone cannot safeguard communities from the worsening impacts of climate change. Community Engagement is needed to inform planning, *and* to ensure buy-in and long-term commitment from stakeholders. In fact, the County committed to do this when it adopted the *Climate Emergency Declaration Resolution*, which states:

“Implementation of the County's climate efforts shall include the engagement of community-based and grassroots organizations and inclusive economic development partners, with a focus on low-income and disadvantaged communities, youth, communities of color, and environmental justice.”

Robust community engagement is necessary to co-create adaptation strategies and implementation measures that preserve community culture, provide local economic growth opportunities, and create a sense of shared ownership and responsibility for community resilience.

Although we applaud the *Environmental Justice Element* published by the County in response to the *General Plan* update, we do not see these priorities reflected in the CAP. The Environmental Justice element must be implemented in the targeted neighborhoods (North Highlands, West Arden-Arcade, South Sacramento, North Vineyard) by including *specific elements pertaining to environmental justice* in the CAP.

- The CAP must deliver public health *and* resilience benefits by *directly* addressing the impacts of climate change that these communities are *already* grappling with – such as the need for affordable housing, clean mobility, access to healthy food, parks and green space. The CAP should promote mitigation and adaptation policies that provide health benefits and adaptive capacity, such as active transportation, mixed use zoning, energy-efficient housing, and urban greening.
- We strongly support the inclusion of measure GHG-02 (Urban Forestry) as an element in the CAP as a near-term priority. We stress that the planting of shade trees in the identified Environmental Justice communities is essential not only to reduce greenhouse gas emissions but also as a significant adaptation measure to reduce the potential for heat-related illnesses in these communities.
- The CAP must develop and implement transportation systems and built environments that are accessible to people of all ages, sizes and abilities, to ensure marginalized communities can participate in and access the benefits of climate action strategies.

Vulnerable Populations (people experiencing homelessness, low-income households, people with disabilities, and communities of color) have historically borne the greatest burden from the effects of pollution and disinvestment. They remain on the front lines of climate change. Residents are more likely to have pre-existing health conditions and less access to health care. With fewer neighborhood parks and tree-lined streets, these populations are more susceptible to the stress of increasing heat. *Needs such as these must be called out and solutions clearly identified and prioritized in the CAP, to ensure the CAP advances environmental justice.*

Because we are all experiencing climate change, we are all responsible for climate action.

Thank you for your consideration of our comments.

## Taylor. Todd

---

**From:** Alexandra Reagan <office@ecosacramento.net>  
**Sent:** Friday, April 9, 2021 9:29 AM  
**To:** PER. climateactionplan; Smith. Todd; Clerk of the Board Public Email; County Executive; Moffitt. Leighann; Lundgren. John  
**Subject:** ECOS comments re Sacramento County Climate Action Plan, March 2021 Public Draft  
**Attachments:** 2021 03 April 09 ECOS Comments on SacCounty CAP of March 2021.pdf

**EXTERNAL EMAIL:** If unknown sender, **do not** click links/attachments.

To Mr. Todd Smith:

On behalf of the Environmental Council of Sacramento, I am submitting by way of this email our comments on the Sacramento County Climate Action Plan, March 2021 Public Draft. Please see the attached letter and respond to this email to confirm its receipt.

Regards,

### Alexandra Reagan

Director of Operations | ECOS

The Environmental Council of Sacramento

My pronouns: she/her/hers

P.O. Box 1526, Sacramento, CA, 95812

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Website: [www.ecosacramento.net](http://www.ecosacramento.net)

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ECOS

ENVIRONMENTAL  
♦ COUNCIL ♦  
OF SACRAMENTO

Post Office Box 1526 | Sacramento, CA 95812-1526

April 9, 2021

Todd Smith  
Principal Planner  
Office of Planning and Environmental Review  
County of Sacramento  
700 H Street, Suite 1450  
Sacramento, CA 95814

Sent via email to [ClimateActionPlan@saccounty.net](mailto:ClimateActionPlan@saccounty.net) [smithtodd@saccounty.net](mailto:smithtodd@saccounty.net)

RE: Sacramento County Climate Action Plan, March 2021 Public Draft

Dear Todd,

Please see our comments on the subject draft climate action plan. Thank you for your consideration.

Sincerely,

Ralph Propper  
ECOS President

cc:

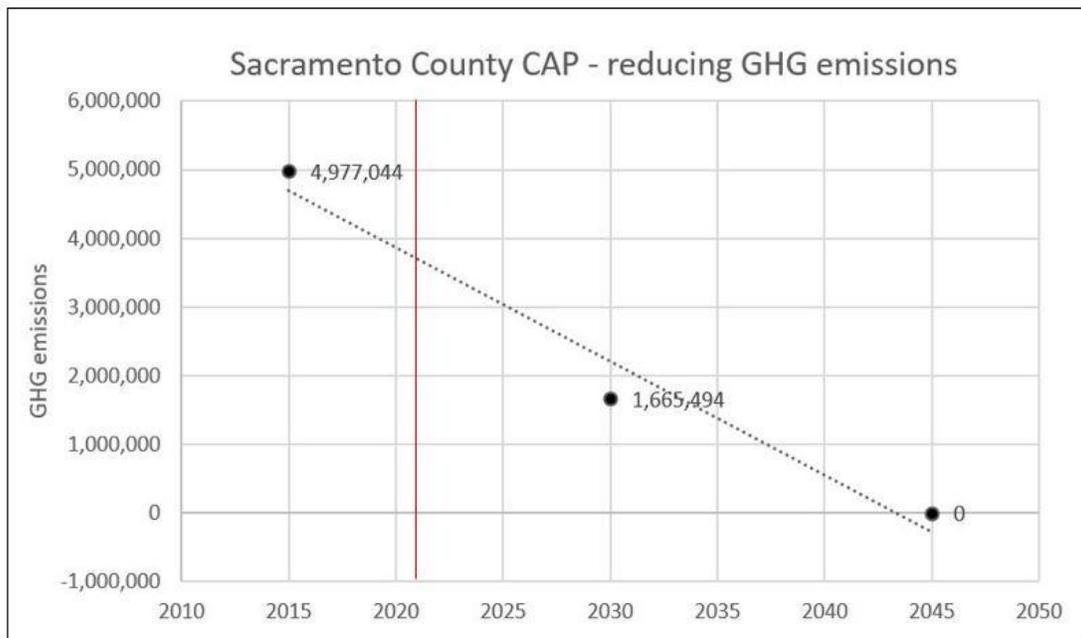
Board of Supervisors via email to [BoardClerk@saccounty.net](mailto:BoardClerk@saccounty.net)  
Ann Edwards, Interim County Executive [CountyExecutive@saccounty.net](mailto:CountyExecutive@saccounty.net)  
Leighann Moffitt, Planning Director [moffittl@saccounty.net](mailto:moffittl@saccounty.net)  
John Lundgren, Senior Planner [lundgrenj@saccounty.net](mailto:lundgrenj@saccounty.net)

**1) The CAP needs to demonstrate how the County will reach carbon neutrality.**

The CAP is very optimistic when it shows the County will reduce two-thirds of its emissions by 2030, less than ten years from now.

While 2015 is the starting point in the graph, it represents the date of the emissions inventory. The starting point for action under the CAP is 2021, indicated by the red vertical line, leaving nine years to achieve a dramatic reduction. The point at 1,665,494 represents the target emissions to be achieved by 2030. In 2045, fifteen years later, the point at 0 represents California’s goal of carbon neutrality.

EXHIBIT 1



If emissions do drop from 4.977M to 1.665M MTCO2e by 2030 because of legislation or regional policies<sup>1</sup>, SMUD’s achievement of zero-carbon electricity generation, and successful implementation of CAP measures, the hardest part is still ahead – the last third of emissions.

The CAP should include contingency plans so that if one or more sources of GHG emissions reduction do not work out, other sources are ready to be implemented. For example, if SMUD achieves only half of its target reduction, the CAP should explain how the County will make up for the other half. <sup>2</sup>

<sup>1</sup> CAP Chapter 1 “Table 2 Legislation . . .” should include SB375; SB743; EO B-55-18 establishing 2045 carbon neutral goal;

<sup>2</sup> Where in the CAP is supporting information provided for the .853M MTCO2e estimate of reductions for SMUD?

The information in the table below is from the CAP. It shows the anticipated reduction in emissions, from left to right. In 2030, the remaining emissions are 1.665M MTCO2e.

EXHIBIT 2

Sacramento County CAP: GHG Emissions Reduction 2021 - 2030					
From App. E, Table E-1, E-2		From App. E, Table E-3, E-4		From CAP, Chapter 1, Table 2	From CAP, Chapter 2
2015 GHG Inventory COMMUNITY		2030 GHG Adjusted BAU Forecast COMMUNITY		SMUD	CAP Measures
Residential Energy	1,193,311	Residential Energy	500,099	Zero-carbon electricity generation policy reduce 852,975 by 2030	From Table 1 Community reduce 772,095 by 2030
Commercial Energy	890,603	Commercial Energy	244,903		
Agriculture	254,899	Agriculture	193,373		
High-GWP Gases	251,085	High-GWP Gases	245,175		
Wastewater	27,253	Wastewater	17,139		
Water-Related	15,222	Water-Related	0		
Solid Waste	352,909	Solid Waste	280,694		
On-Road Vehicles	1,671,596	On-Road Vehicles	1,468,071		
Off-Road Vehicles	196,769	Off-Road Vehicles	253,857		
	4,853,647		3,203,311		
2015 GHG Inventory GOV OPS		2030 GHG Adjusted BAU Forecast GOV OPS			
Buildings, Facilities	28,247	Buildings, Facilities	23,736		From Table 5 Gov Ops reduce 21,040 by 2030
Airports	18,310	Airports	15,920		
Wastewater	565	Wastewater	597		
Water-Related	4,665	Water-Related	3,498		
Streetlights, Traffic Sig	3,729	Streetlights, Traffic Sig	2,796		
Employee Commute	38,290	Employee Commute	31,818		
Vehicle Fleet	29,591	Vehicle Fleet	30,808		
	123,397		109,173		
<b>TOTAL REMAINING</b>	<b>4,977,044</b>		<b>3,312,484</b>		

a) Risk Mitigation – Have possible actions ready to be implemented

If some GHG reductions sources fail to come to fruition, instead of going directly to carbon offsets, as described in Section 2.3, the CAP should identify and prepare for substitute actions. Some possibilities are shown below. The CAP should include a risk mitigation plan.

EXHIBIT 3

CAP Chapter 2 Measures	Actions that could be taken:	GHG reductions	Sector
GHG-01: Carbon Farming	Put an additional 200,000 acres into carbon farming. <sup>3</sup>	.378M	Agriculture
GHG-04: Energy Effic., Electrification of Existing Nonres. Buildings	Accelerate the retrofit of 75% existing non-residential buildings instead of 25%. <sup>4</sup>	.032M	Energy - Commercial
GHG-06: Energy Effic., Electrification of Existing Resident'l Buildings	Accelerate the retrofit of 75% of existing residential buildings instead of 25%.	.354M	Building Energy
GHG-10: Electric Vehicle Infrastructure Program	Implement an additional 1,170 chargers.	.104M	On-Road Vehicles

<sup>3</sup> How much acreage in the County can do Carbon Farming? Can the County require these practices?

<sup>4</sup> The emission reductions from nonresidential buildings seem small. Please explain.

**b) Risk Mitigation – The planning work must start earlier**

Each planning activity listed below is taken from the GHG reduction measures in the CAP and is therefore necessary for the GHG reduction to occur. Altogether, this is a lot of planning work. This should be done as soon as possible to enable the GHG reductions to begin. The CAP includes a completion date for some activities but not for all.

The County needs to accelerate the planning work, to achieve completion of all the amendments, changes, updates, and developments by December 2022. This will require additional planning staff.

**EXHIBIT 4**

<b>Measures that require Planning Work to start GHG reductions</b>	
<b>No.</b>	<b>GHG Measure</b>
7	Energy Code - Reach Code for New Residential Buildings
11	VMT Mitigation Program
12	Zoning Code to include a TSM Plan
13	Zoning Code to modify Parking Standards
14	Plan transit connections, coordinate with SacRT
15	Pedestrian Master Plan or Active Transportation Plan
15	Pedestrian Capital Improvement Program
15	Complete Streets Policy
16	Development Standards for new and existing Roadways to include Traffic Calming
17	Zoning Code to ensure preferred siting of employee bike parking and encourage bike use
18	County’s Federal/State Legislative Priorities document to encourage fuel-efficient vehicles
19	Building Code - Require Electric Vehicle Charging infrastructure (EVSE)
19	Development Standards for Electric Vehicle charging infrastructure
20	Active Transportation Plan to add Safe Routes to School and related capital improvements
21	Community Plans and Corridor Plans in urban areas to support infill and TOD
22	GIS-based scoring system to screen new development for access to destinations
23	Set up account to facilitate infill dev w/fees on DU in Approved & Pending Master Plans

**2) The CAP should address capacity building**

**a) Hire more planning staff**

The CAP should call for the hiring of more staff to complete as soon as possible the planning activities listed above. The planning work enables GHG-reducing follow-on activities, including the design and construction of many capital improvements. A building boom is needed to achieve the GHG reductions called for by 2030. Federal funding may become available to help build the infrastructure, and the County should be ready by having the planning work complete.

**b) Set up a climate team to coordinate the County’s efforts**

In Chapter 4 Implementation, the CAP mentions the Climate Emergency Mobilization Task Force and calls for coordination with it. The CAP needs to go much further: it should call for and describe this climate team, its composition, and roles, responsibilities, and authority, so that the team can be engaged and go into action immediately following the Board of Supervisors’ approval of the CAP.

### 3) The CAP should include a financial component

#### a) Alignment of values

To ensure the County's time, effort, and revenue are effective in reducing GHG emissions, the CAP should require a determination of consistency with CAP strategies for the County's planning, capital improvement projects, and operations, as well as for plans and projects proposed by other parties. This is a necessary step. For example:

- SACOG favors grant applications for projects aligned with the MTP/SCS.
- California State Transportation Agency (CalSTA) reviews projects funded with State transportation funds for consistency with its goals.
- Governor Newsom's Executive Order N-19-19 called for the creation of a Climate Investment Framework to leverage state funds to drive investment toward carbon-neutral technologies.<sup>5</sup>
- The 2015 Paris Agreement calls for "Making finance flows consistent with a pathway towards low greenhouse gas emissions and climate-resilient development."<sup>6</sup>

#### b) Funding plan and costs to implement the CAP

The CAP identifies only two fund sources, both from new developments. The revenue from both sources is to be invested into high-density infill projects, per Chapter 4 Implementation, bullet 9.

- In GHG-11, the County plans to charge fees to new developments that do not achieve a 15 percent reduction in daily VMT compared to the regional average. The fees will be collected to offset VMT impacts and put into a County VMT mitigation bank.
- In GHG-23, the County plans to charge \$1000 for each dwelling unit in the Approved or Pending Master Plans listed in Measure CHC-23 Incentivize Infill Development, Table 4, page 19.

Although we want funds to go toward infill development, it is disheartening to see the arrangement laid out in the County's CAP, in which less VMT- and GHG-producing infill development is dependent upon the successful implementation of more VMT- and GHG-producing greenfield development, namely the Approved and Pending Master Plans. The County should review its budget and reprioritize and reorganize its revenue and funding methods to ensure achievement of the CAP's emission reduction goals, especially because the fate of Pending Master Plans cannot be assured.

Regarding the cost to implement the CAP, the qualitative cost analysis in Appendix G gives us a rough idea of the County's administrative costs. The CAP should develop an order-of-magnitude cost estimate with a breakdown that includes administrative and professional; operations; and capital costs for both County and Others. Based on this cost estimate, the CAP should develop a funding plan. Both the cost estimate and funding plan should be included in the CAP document and be part of what is approved by the Board of Supervisors. Without these, the CAP will not be able to achieve its goals.

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<sup>5</sup> <https://www.gov.ca.gov/2019/09/20/ahead-of-climate-week-governor-newsom-announces-executive-action-to-leverage-states-700-billion-pension-investments-transportation-systems-and-purchasing-power-to-strengthen-climate-resili/>

<sup>6</sup> [https://unfccc.int/sites/default/files/english\\_paris\\_agreement.pdf](https://unfccc.int/sites/default/files/english_paris_agreement.pdf) Article 2, Para.1(c)

**4) The CAP should strengthen transportation as a strategy, especially the On-Road Vehicle Sector.**

The 2030 forecasted GHG reductions in the On-Road Vehicle Sector are relatively modest, given that this sector contributes over a third of GHG emissions in the County (see GHG Inventory in Exhibit 2 above.) The combined Adjusted BAU and GHG Reduction Measures reduce this Sector by only 17 percent.

EXHIBIT 5

On-Road Vehicle Sector			
Percent Reduction	Total GHG emissions	Reduction in GHG emissions	Source
	1,671,596		2015 Inventory
12%	1,468,071	203,525	2030 Adjusted BAU forecast
17%	1,386,444	81,627	2030 Community GHG Reduction Measures

The County should take the following actions to increase GHG emission reductions.

**a) Accelerate the planning work.**

Almost all of the measures in the On-Road Vehicle Sector require planning work before the reductions can begin, so the planning work must be completed as soon as possible. Refer to Para. 1b and 2a above for more information.

**b) Install more EV chargers. Measure GHG-10 Electric Vehicle Infrastructure.**

At 34,867 MTCO<sub>2</sub>e/year, this measure reduces more than any other On-Road measure. Is the number of installed chargers, 390, based on assumed EV demand or on available resources? The CAP should explain how this number can be increased.

**c) Make increasing transit ridership one of the County’s first priorities.**

Improved Transit Access (Measure GHG-14) is essential to reducing on-road vehicles. The CAP should provide specific progress benchmarks for this measure and explain how this measure can be substantially strengthened.

## 5) The CAP should treat *Compact Land Use Development around Transit (Infill Zones)* as a strategy.

### a) The Rationale

Due to the region's growth pressures, a majority of people in the County are unlikely to be able to live in single-family neighborhoods, but in multi-unit housing that is convenient to transit and work sites.

This shift to more a more compact, walkable development pattern, has been promoted for over twenty years by the California legislature and governors, and by regional governments such as SACOG, in order to reduce GHG emissions per capita, reduce VMT per capita, increase housing affordability, increase access and equity of access to destinations and services, improve the quality of public spaces, improve public health, protect open space, and reduce energy consumption during construction and during operations. The idea is to build more sustainable communities.

“Senate Bill 375 requires CARB to develop and set regional targets for greenhouse gas (GHG) emission reductions from passenger vehicles. CARB has set regional targets, indexed to years 2020 and 2035, to help achieve significant additional GHG emission reductions from changed land use patterns and improved transportation in support of the State's climate goals, as well as in support of statewide public health and air quality objectives. Metropolitan planning organizations (MPOs) must prepare a sustainable communities strategy (SCS) that will reduce GHG emissions to achieve these regional targets, if feasible to do so.”<sup>7</sup>

In a paragraph on Cross-Sector Interactions, CARB's Scoping Plan states: “more compact development patterns reduce per capita energy demands, while less-compact sprawl increases them.”<sup>8</sup>

This development pattern deserves to be its own strategy in the CAP. By giving it a platform in the CAP, the County would be taking a stand against the GHG-generating impacts of sprawl.

The strategy itself: Reduce emissions-generating sprawl-type land use patterns by promoting and investing in infill zones. These zones will have infill housing and three- to ten-story mixed-use developments located in established communities and along commercial corridors. This compact development will bring together retail, work sites, and residences, around transit stations and along walkable, bikeable streets served by bus transit. Lower density development just beyond the infill zones will enjoy easy access to populated public spaces, shops, and transit.

### b) Suggested names for this strategy

The strategy could have a name similar to one of the two transportation strategies in the CAP – it could be called *Reduced Land Consumption for Development and Alternative Land Use Patterns* -- but *Compact Land Use Development around Transit/Infill Zones* seems more positive.

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<sup>7</sup> <https://ww2.rb.ca.gov/our-work/programs/sustainable-communities-program/regional-plan-targets#:~:text=CARB%20has%20set%20regional%20targets,health%20and%20air%20quality%20objectives>

<sup>8</sup> [https://ww2.arb.ca.gov/sites/default/files/classic/cc/scopingplan/scoping\\_plan\\_2017.pdf](https://ww2.arb.ca.gov/sites/default/files/classic/cc/scopingplan/scoping_plan_2017.pdf), pg 67

**c) Other jurisdictions have a strategy for this**

San Francisco’s draft Climate Action Plan has both a Transportation/Land Use Strategy and a Housing Strategy.<sup>9</sup> Below is TLU 6: Increase density, diversity of land uses, and location efficiency

**TLU 6: Increase density, diversity of land uses, and location efficiency across San Francisco.**

Supporting Actions

- TLU 6-1: By 2023, re-zone to allow for multi-family housing throughout San Francisco.
- TLU 6-2: By 2023, increase the types of home-based businesses allowed in residential districts to reduce commute trips and provide more flexibility in how space can be used by San Franciscans.

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WORKING DRAFT | DECEMBER 2020

- TLU 6-3: Create an interagency working group or division to facilitate the development of neighborhoods where people live within an easy walk or roll of their daily needs (e.g., parks, retail goods, services).
- TLU 6-4: Every five years, identify and reimagine under-utilized publicly owned land and roadways that could be transformed or repurposed.
- TLU 6-5: Design public space and the transportation system (including roadways) to advance racial and social equity by co-developing public spaces with BIPOC community members and understanding their needs before designing the space.

**d) GHG Reduction Measures would change if this strategy were added**

The GHG reductions from compact development patterns are varied, such that multiple sectors are needed to account for them – Agriculture, Energy Residential, Energy Commercial, and On-Road Vehicles.

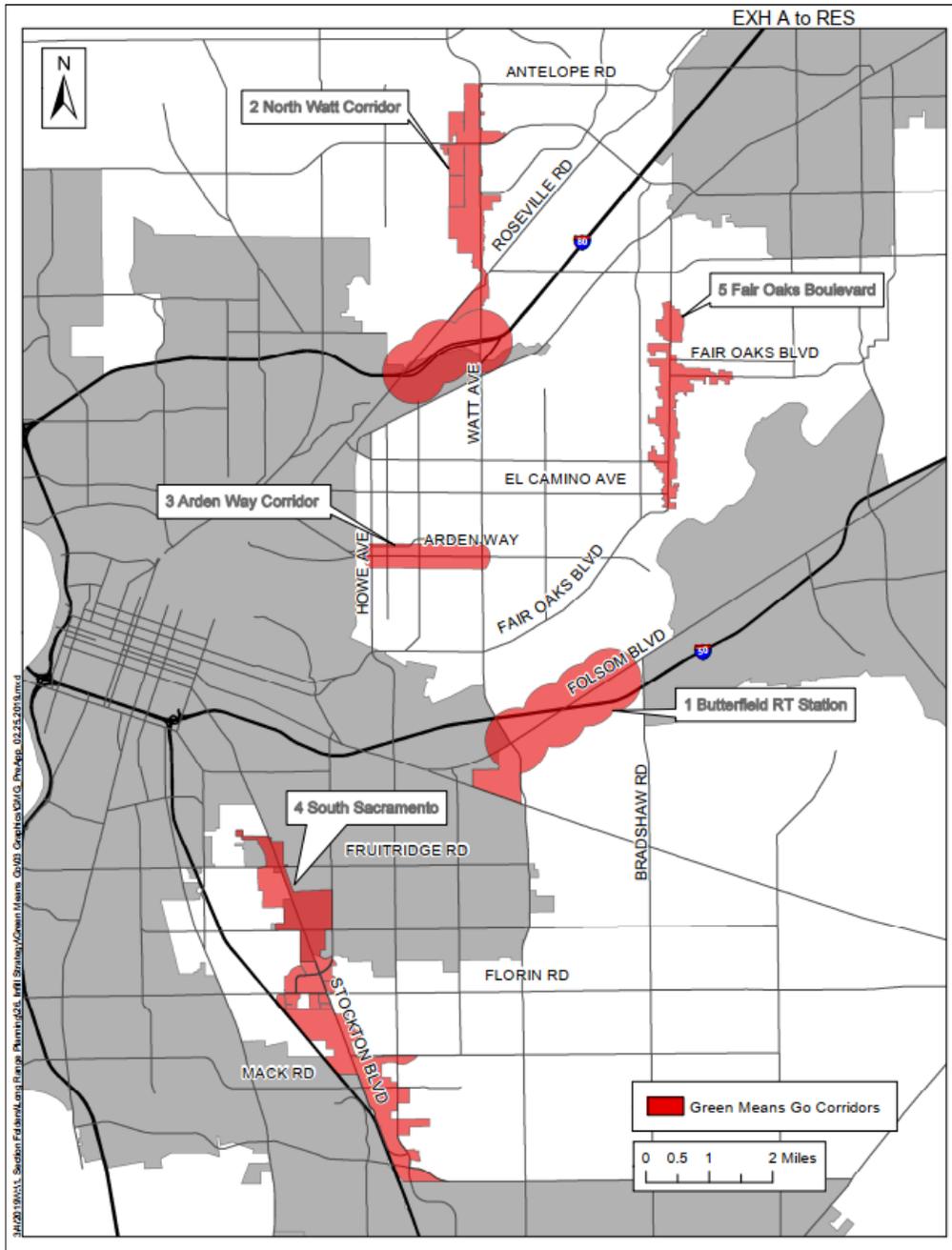
Among others, Measure GHG-23 Incentivize Infill Development would change. It would actually describe steps the County would take to incentivize infill development and set benchmarks/target indicators to show progress. Because the County has identified infill capacity for 33,000 dwelling units, the CAP should set a target of at least 10,000 dwelling units (DU) in Infill Zones by 2030, another 10,000 DU by 2040, and another 10,000 DU by 2050. This would not fulfill the County’s Regional Housing Needs Allocation of 21,272 for 2021-2029, but it would be a good start.

Measures would also describe the reduced energy used to manufacture the fewer materials required by multi-unit dwellings, and the reduced energy used by residents to operate their dwelling unit.

<sup>9</sup> <https://sfclimateaction.konveio.com/>

e) **Examples should be given.**

The County's identification of Green Zones for SACOG's Green Means Go initiative is a good start. The County recently proposed 10,000 dwelling units for five of the six the highlighted infill areas on the map.



## Taylor. Todd

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**From:** PER. climateactionplan  
**Subject:** Questions/comments on Draft Climate Action Plan

**From:** Jim Wiley <[jwiley@taylor-wiley.com](mailto:jwiley@taylor-wiley.com)>  
**Sent:** Friday, April 9, 2021 11:14 AM  
**To:** Smith. Todd <[smithtodd@saccounty.net](mailto:smithtodd@saccounty.net)>  
**Cc:** Angelo G. Tsakopoulos <[agtesq@tsakvest.com](mailto:agtesq@tsakvest.com)>  
**Subject:** Questions/comments on Draft Climate Action Plan

**EXTERNAL EMAIL:** If unknown sender, **do not** click links/attachments.

Hi Todd,

Thank you for discussing the draft Climate Action Plan with us yesterday. Based upon our discussion we have narrowed our questions regarding the draft to the following:

- How are the measures applied to land use entitlements? For instance, with a major Master Plan or Specific Plan where there is a GHG reduction plan and the project results in less than 4.0 MT CO<sub>2</sub>e per capita in 2030, how are the measures implemented? Are they all required to be implemented?
- How does this apply to Master Plan Projects already approved with or without zoning and/or maps?
- In particular, Is Measure GHG-23 going to be implemented through a fee ordinance? Will it apply to all new development? Will it be prorated by location, i.e. VMT or some other metric? How will the funds be used? How will the reduction in GHG be quantified?
- How will uses (some essential, i.e. hospitals, concrete and asphalt batch plants) that require the use of natural gas be allowed?

Please let us know if you have any questions about or questions.

Thanks,  
Jim

Jim Wiley  
TAYLOR & WILEY  
500 Capitol Mall, Suite 1150  
Sacramento, CA 95814  
916.929.5545

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## Taylor. Todd

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**Subject:** Comments on Sacramento County Draft Communitywide Climate Action Plan, re Communitywide Greenhouse Gas Reduction and Climate Change Adaptation (Communitywide CAP) Project

From: Steve Uhler <sau@wwmpd.com>

Sent: Friday, April 9, 2021 11:21 AM

To: PER. climateactionplan <climateactionplan@saccounty.net>

Subject: Comments on Sacramento County Draft Communitywide Climate Action Plan, re Communitywide Greenhouse Gas Reduction and Climate Change Adaptation (Communitywide CAP) Project

EXTERNAL EMAIL: If unknown sender, do not click links/attachments.

Understanding Renewable Energy Credits and Power Content

Hello Climate Action Planners,

Comments on Sacramento County Draft Communitywide Climate Action Plan

<https://planning.saccounty.net/PlansandProjectsIn-Progress/Documents/Sacramento%20County%20Draft%20Communitywide%20Climate%20Action%20Plan.pdf>

Know the source of electricity and who has legal title to Renewable Energy Credits (REC) to ensure others will consider Sacramento County as making progress toward or is achieving zero carbon or zero Greenhouse Gas (GHG) emissions.

Review the below EPA.gov link to understand how to utilize rules for claiming the making of progress toward or is achieving zero carbon or zero GHG emissions in the electricity sector.

Ensure your contractual right to make claims.

Ensure your purchase does not count towards a mandate.

Make claims that match the scope of your purchase.

Organizations should avoid making claims where green power purchases originate from projects in markets outside of where the green power will be applied.

Retain ownership of RECs for on-site green power.

Retire the RECs associated with your green power purchase.

Support your claims by buying certified or verified green power products.

Limit claims to indirect emissions.

Use the terms "REC" and "offset" correctly in your claims.

RECs substantiate the claim that you are using a specific number of megawatt-hours of renewable electricity from a zero-emissions renewable resource.

Follow Federal Trade Commission (PDF) (36 pp, 195K) and National Association of Attorneys General green marketing guidance.

See, <https://www.epa.gov/greenpower/making-environmental-claims> for more detail.

Review SMUD's 2019 Power Content Label, note that some green pricing programs deliver mostly natural gas sourced generation.

<https://www.smud.org/SMUDPCL>

Don't make claims to renewable energy to show GHG reductions, if Sacramento County does not or will not have legal title to RECs verified through unimpaired contracts for renewable energy sourced electricity.

Steve Uhler  
sau@wwmpd.com

**Taylor. Todd**

---

**From:** coyote1@surewest.net  
**Sent:** Friday, April 9, 2021 1:24 PM  
**To:** PER. climateactionplan  
**Subject:** CAP Comments

**EXTERNAL EMAIL:** If unknown sender, **do not** click links/attachments.

## **Comments on County Climate Plan**

**Rick Codina April 9, 2021**

This is a frankly disappointing Plan that does little to advance the County's efforts to reduce greenhouse gas (GHG) emissions in concert with state and other regional efforts. It offers few concrete prescriptive solutions and instead relies heavily on education, persuasion and the programs and incentives of other agencies such as the Sacramento Municipal Utility District. I have two specific areas for complaint:

**Agricultural Sequestration.** The Plan ascribes more than half of its community GHG to modified agricultural practices of county farmers including the use of compost and advanced grazing and tillage techniques. While these actions may in fact result in emission reductions, they should be verified by an approved climate certification agency such as the Climate Registry to be credible before being counted in the County's goals. Moreover, it appears that the County's role in these efforts is relatively tangential. It will not be providing compost to farmers for example, and it is unclear if the County currently employs farm advisors who can provide the ongoing expertise or monitoring to ensure successful implementation over time.

**Building Electrification.** In my view, the proposal for a residential ordinance (GHG-07) requiring all-electric new construction is the most directly effective recommendation in the Plan. It mirrors ordinances under consideration by the City of Sacramento and already in effect in more than 40 other California cities. But the County does not go far enough. It does not include new commercial buildings for all-electric construction, calling only for a rather tame CalGreen Tier 1 compliance. And it fails to address natural gas space and water heating equipment in existing buildings where the bulk of GHG sources reside. Instead, it makes a weak call for education and unspecified collaboration with utilities (GHG 5 and 6) for energy conservation. This confuses the metric of GHG reduction which relies on the far more effective actual removal of gas-using equipment, with energy conservation which focuses on efficient appliances regardless of the fuel source.

My biggest issue is the Plan's cop-out concession that it need not pursue meaningful GHG reduction actions because the County is already in compliance with current statutory requirement, largely because of other state regulatory actions and SMUD's proposed Carbon Zero Plan. SMUD, for its part, has elected to go beyond SB-1 and the ARB's Scoping Plan requirements, instead setting goals to meet its Climate Emergency Declaration. The County has also approved the same Climate declaration which pledges to reduce carbon emissions to zero by 2030. It is this goal which the Plan should be focused on.

## Taylor. Todd

---

**From:** Laurie Litman <llitman@pacbell.net>  
**Sent:** Friday, April 9, 2021 2:14 PM  
**To:** PER. climateactionplan  
**Subject:** Do better

**EXTERNAL EMAIL:** If unknown sender, **do not** click links/attachments.

Public Comment,

The current Climate Action Plan (CAP) draft is unacceptable!! After almost a decade of delay, it is very obvious that the County is not even trying to seriously address the biggest challenge of our lifetime: climate change.

I have children and grandchildren who will be even more impacted than we are today, and already we are seeing catastrophic wildfires and air pollution, drought, extreme weather, food and water insecurity, flooding, novel diseases, and more. According to the IPCC, we have fewer than 10 years to cut our emissions drastically. Sacramento County must do its part.

I am embarrassed for the County that you don't understand the extent of the threat—our grandchildren may not survive your willful neglect of science and common sense. This CAP ignores the actions needed to preserve a safe future, and tries to avoid robust actions with meaningless words, assumptions, and actions (such as depending on SMUD's actions rather than taking responsibility to cut the County's emissions).

You know what needs to be done...DO IT!! Below are some major problems with this draft CAP.

1. The draft CAP does not reflect the County's Climate Emergency Declaration (CED). There is fig-leaf verbiage but no substantive action based on the CED's specified 2030 carbon-neutral goal. In fact, the draft would defer the CED provisions until a proposed 2024-25 CAP update! The CAP just kicks the can down the road, where implementing measures to avoid runaway climate change will be even more difficult.
2. The draft CAP does not offer actions to prioritize infill over sprawl development. Sprawl is the major driver of passenger VMT, the County's biggest source of GHG.
3. Carbon offsets are a cop-out and should be used only as a last-ditch effort when other

actions have failed. Offsets should not be part of the initial set of actions to address the climate crisis. If offsets are used, they must be kept local to both reduce GHG emissions and provide benefits to disadvantaged communities.

4. Most of the CAP measures are a joke. They will be impossible to enforce and monitor because they are described ambiguously or in aspirational terms, defer formulation of mitigation, do not identify costs and funding, propose partnership or collaboration with uncertain effect, do not identify or commit to a schedule of performance, and state final 2030 goals without interim milestones.

5. The draft CAP does not provide robust public involvement in its development. What are you afraid of? Combating climate change requires community-wide input and action.

6. The draft CAP assumes SMUD will meet its aspirational 2030 carbon-zero goal, reducing the need for County action. That's ridiculous! We applaud SMUD for their actions, but no matter what SMUD achieves the County must also do all they can to address the climate crisis.

7. The draft CAP does not provide an adequate Implementation Plan. Implementation is everything, the rest is just words. You need to do better!!!

Laurie Litman

llitman@pacbell.net

301 27th St

Sacramento, California 95816

## Taylor. Todd

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**Subject:** Corrected copy - Sierra Club & Sac Climate Coalition Comment letter re: County CAP Public Draft  
**Attachments:** CAP Public Draft SC.SCC Comments 4.9.2021 FINAL.pdf

**From:** Sacramento Sierra Club <[sacramentosierraclub@gmail.com](mailto:sacramentosierraclub@gmail.com)>

**Sent:** Friday, April 9, 2021 1:22 PM

**To:** Smith. Todd <[smithtodd@saccounty.net](mailto:smithtodd@saccounty.net)>; Lundgren. John <[lundgrenj@saccounty.net](mailto:lundgrenj@saccounty.net)>; Frost. Supervisor <[SupervisorFrost@saccounty.net](mailto:SupervisorFrost@saccounty.net)>; Nottoli. Don <[nottolid@saccounty.net](mailto:nottolid@saccounty.net)>; Supervisor Serna <[SupervisorSerna@saccounty.net](mailto:SupervisorSerna@saccounty.net)>; Kennedy. Supervisor <[SupervisorKennedy@saccounty.net](mailto:SupervisorKennedy@saccounty.net)>; Rich Desmond <[RichDesmond@saccounty.net](mailto:RichDesmond@saccounty.net)>

**Cc:** Katrina H <[kandchf@gmail.com](mailto:kandchf@gmail.com)>; Sean Wirth <[wirthsoscranes@yahoo.com](mailto:wirthsoscranes@yahoo.com)>; [info@sacclimate.org](mailto:info@sacclimate.org)

**Subject:** Corrected copy - Sierra Club & Sac Climate Coalition Comment letter re: County CAP Public Draft

I am sending a corrected copy of the comment letter submitted earlier containing the Sierra Club and Sacramento Climate Coalition Comments on the March 2021 Public Draft of the CAP. It was amended to add a line denoting the nature of the document.

Please replace the document sent at 12:21 pm

Thank you,

Barbara Leary, Chairperson

**Sierra Club Sacramento Group**

909 12th Street, Suite 202, Sacramento, CA 95818

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# SIERRA CLUB

SACRAMENTO GROUP

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April 9, 2021  
\*corrected copy

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John Lundgren, Senior Planner  
County of Sacramento  
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County Board of Supervisors, Chair Frost, Vice-Chair Nottoli, Serna, Kennedy, & Desmond  
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Sent via email: [smithtodd@saccounty.net](mailto:smithtodd@saccounty.net) , [lundgrenj@saccounty.net](mailto:lundgrenj@saccounty.net) , [SupervisorFrost@saccounty.net](mailto:SupervisorFrost@saccounty.net) ,  
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RE: Sacramento County Climate Action Plan March 2021 Public Draft

Dear Mr. Smith and Mr. Lundgren, Supervisor Chair Frost, Vice-Chair Nottoli, Supervisors Kennedy, Desmond, and Serna,

Thank you for the opportunity to address the ongoing development of the Sacramento County Climate Action Plan (CAP) following the release of the Public Draft. The comments in this document reflect the ongoing concerns that both the Sierra Club and the Sacramento Climate Coalition have with the Public Draft, and therefore do not support the CAP in its current form.

Recognizing that the CAP is following the State guidelines, the current document is insufficient as we face an unprecedented climate crisis. The Climate Emergency Declaration passed by the Board of Supervisors in December of 2020 addresses this and calls for carbon neutrality by 2030. We find the plan to be wholly inadequate as a Climate Action Plan, as the plan does not lead the County to carbon neutrality by 2030 and in fact predicts over 3.2 million MTCO<sub>2e</sub>/year in 2030. Therefore, there should be no target dates for carbon neutrality and zero emissions other than 2030 in the document to avoid confusion. There should be a sense of urgency communicated throughout the document, as well as concrete, timely measures to reach carbon zero by 2030.



[info@sacclimate.org](mailto:info@sacclimate.org)

The CAP and the Appendix must create a hierarchy of priorities with the highest being those that will eliminate and sequester greenhouse gas emissions the fastest and to the greatest extent.

We have found that there are a significant number of missing CAP measures to support the County General Plan Policies, particularly in sections where General Plan Policy text is also vague though aspirational. We found a lack of time frames for initiation and monitoring of CAP measures, implementation and enforcement of the measures, and recommended funding mechanisms to support the CAP measures.

We are hoping to see more specificity in the CAP measures as the document is re-evaluated following the input the County receives from comments submitted by our and other concerned environmental organizations. The Environmental Council of Sacramento, 350 Sacramento, and the Citizens Climate Lobby have submitted comments that we also share and support. We incorporate their comments into this letter by reference.

In addition, we are not supportive of purchasing carbon offsets. If carbon offsets become a part of the plan, they must be monitored, tracked, and reported on annually. Additionally, if carbon offsets become a piece of the GHG reduction plan they, along with other mitigation measures such as tree mitigation for protected species, wetland mitigation, and open space mitigation must have specificity in implementation included in the CAP. We want to see assurances that each mitigation measure noted in the CAP is done within the County. Any in lieu fees for mitigation projects for habitat should aid in the enhancement of existing restoration projects, for example along the American River Parkway, for the augmentation of existing Habitat Conservation Plans, and establishment of additional habitat conservation areas and easements to account for the loss of sequestration capacity when open lands/farmland is lost to development.

### **Sierra Club Specific Comments**

To meet conservation, land use, and open space goals seen in the Climate Action Plan we recommend that the County engage a professional grant writer to aid staff in obtaining State and Federal funding to meet conservation goals as noted in many of the changes we are requesting. Funding programs to accomplish this could include the \$1,000 per dwelling unit for new construction that has been proposed. The proposal to institute a “one size fits all” fee structure is counter-intuitive and not consistent with the need to address environmental justice issues by not treating disadvantaged communities the same as wealthier neighborhoods where affording a slightly higher fee would not be a burden.

We also want to express our dismay that the measure to “Preserve Lands Identified in the SSHCP Voluntary Conservation Targets” was removed from the Administrative draft of the CAP. It is important to prioritize work to ensure that the blue oak woodland and associated habitat conservation goals in the northeast portion of the SSHCP Plan area, as laid out in the Appendix J of the SSHCP “above and beyond” conservation” targets, are realized. This will have the benefit of preserving important GHG sequestration resources while also providing protection for the only large remaining connectivity corridor to join the south and the north county in the eastern portion of the county.

The reason for dismissal (feasibility and cost) does not seem to take into account the realities associated with SSHCP Appendix J and the "above and beyond" targets found therein. Because the voluntary

targets are part of a regional conservation strategy, they have an elevated status when it comes to seeking grant funds for conserving the lands identified as targets for voluntary conservation in the SSHCP. The county would not be incurring much, if any, cost by supporting those grant writing efforts. As for feasibility, supporting grant writing efforts is hardly a heavy lift, especially if the county is not writing the grants. It is unclear what is infeasible, and we suggest the County reconsider this dismissal.

Following are examples of areas in the CAP that are of particular concern, where there is a disconnect between the General Plan policies and Supportive CAP measures in Appendix C:

### **Agriculture**

Page C-1 - Ag 12 -15-17: The General Plan Policy states in these sections that “the County will cooperate with landowners of agriculturally zoned properties to promote the placing of natural preserve/mitigation amenities”, “create mitigation banks, environmental mitigation sites, wildlife refuges, or other resource preserves...”, and “establish conservation easements combining preservation of agricultural uses, habitat values, and open space on the same property”. These measures are missing CAP measures which would support implementation and should note that conservation easements, when combined with agricultural land, need to exclude those lands without or with little habitat value (i.e. tree and vineyard properties). Converting agricultural land with unsupportive crops, such as trees/vineyards, to row crops reduces the expense of land purchases for habitat use as compared to buying row crop land.

### **Conservation**

There are multiple references in the tables intended, but often fail, to show that General Plan Policy is supported by various CAP measures. For example, the oft-used Flood Control measure 3 is often listed as the supportive CAP measure “prioritizing green infrastructure solutions” yet does not direct that “new locations suitable for multi-benefit..., flood control...and habitat restoration” occur within the County, approximate to areas disrupted by development, or with native mitigation vegetation and trees known to be high in carbon-sequestration. More specifically we find that the following areas lack detailed CAP measures as described.

Page C-18-19 - CO 19, CO 20, CO 21, CO 25, and CO 26 and Pg. C-22 CO-58, regarding the American River, Cosumnes River, and Sacramento River habitat & ecosystem preservation, maintenance, and restoration: Specific time frames and actions should be delineated to identify funding needs, the time frame for implementation, responsible agencies, and evaluation of monitoring, outcomes, and frequency of reporting to the Board of Supervisors. The CAP Measures Flood-03 and 14 do not accomplish these important goals.

Page C-22, CO- 61 and 62: The General Plan Policy notes that “Mitigation should be consistent with Sacramento County adopted habitat conservation plans” and “Permanently protect land required as mitigation”. There is no supportive CAP measure for either of these statements. This is of critical importance as mitigation land is becoming scarce as now evidenced by the lack of land in the North Natomas Basin to accomplish the goals of the Natomas Basin Habitat Conservation Plan. A CAP measure is needed to commit the County not to disrupt the NBHCP strategy.

CO-63 and 64: The General Plan Policy states, “Vernal Pools, wetlands, and streams... shall not be drained” and “Support and facilitate the creation and biological enhancement of large natural

preserves...” Measure Flood-03 does not accomplish these goals. Again, mitigation for the loss of this must be done within the County, specifically near or adjacent to the area where the loss has occurred. In addition, there are no supportive CAP measures related to CO-66 and 67 regarding mitigation site monitoring and management. CO-69 is also without a supportive CAP measure. The general policy text should be amended to prohibit new infrastructure for development in wildlife preserves.

Page C-23 CO-72,73 and 76 regarding easement dedication and fee title to open space lands as a condition of approval: There is no CAP measure corresponding to these General Plan policy statements, and the wording does not assure the County that these actions will take place within the County, nor is there a CAP measure to support the “aid in recovery of special status species”.

Page C-24 CO 90 and 99: General Plan policy text notes “Increase riparian woodland, valley oak riparian woodland and scrub habitat...” and “encourage habitat restoration”. There is no supportive CAP measure for either of these General Plan policy texts. Known carbon-sequestering native plants and trees must be used in habitat restoration to enhance CO2 reductions. The California Native Plant Society Homegrown Habitat program should be noted as a resource in plant selection in addition to the Sacramento Tree Foundation.

Page C-28 CO 118: General Plan policy text notes “Development adjacent to waterways...should” (not shall which would be appropriate) preserve and enhance riparian habitat and its function.” There is no CAP measure noted.

CO-130: General Plan policy text notes “Protect, enhance and restore riparian, in-channel and shaded riverine aquatic habitat...” Measure Flood 3 and 9 do not outline funding mechanisms for research and planting that should be identified, such as in lieu fees or monies from future assessments on housing development.

Page C-29: General Plan policy text notes “If the project site is not capable of supporting all the required replacement trees...replacement cost...may be paid into the Tree Preservation Fund”. GHG-02 does not specify that mitigation is within the County, nor does it require a monitoring or reporting plan for successful mitigation.

Page C-30 CO -143 and CO-144 regarding General Plan policy text referring to new tree plantings and regional Greenprint: Again GHG-02 needs a monitoring or reporting plan for successful mitigation.

Page C-31 CO-145: Mitigation in GHG-02 for tree loss should be within County, approximate to site of tree removal, mandated and enforced in residential and parking lots.

### **Land Use**

We would like to see the retention of open space lands as a specific percentage of land, mirroring the goal of Governor Newsom who proposes “to preserve and protect **30%** of the state's lands...by 2030.” The addition of such a CAP measure would support long term carbon sequestration goals in Sacramento County. Efforts to maintain open space and habitat with long term conservation plans through Land Use CAP measures has the co-benefit of reducing sprawl and the production of greenhouse gases that result from the transportation sector. Areas of particular concern in this section of the document are as follows:

Page C-43 LU-12: General Plan Policy notes that “the County will prohibit land use projects which are not contiguous to the existing UPA”. However, there is no corresponding CAP measure. LU -15 is also without a CAP measure and “should be” rather than “will be” is noted in this General Plan Policy that reads “Planning and development of new growth areas should be consistent with Sacramento County Habitat Conservation Plans and other efforts to preserve and protect natural resources”. No enforceable measure appears to exist that would ensure consistency with habitat conservation plans throughout the County.

Page C-53: General Plan Policy notes in LU-123 “Before granting approval of an amendment to the Land Use Diagram the BOS shall find that: ... (bullet 2 •) the request is consistent with the goals and objectives of the Sacramento County adopted Habitat Conservation Plans” There is no supportive CAP measure to ensure that lands are set aside to support the existing Habitat Conservation Plans. Lands needed to maintain the Habitat Plan objectives must be set aside and direction included in any amendment to the Land Use Diagram.

Page C-54 LU-127: The General Plan Policy notes that “The County shall not expand the USB unless” followed by 7 bullet points allowing exceptions for this to occur. There is no Supportive CAP measure to evaluate the frequency of use of the exceptions or a method evaluating the amount of land lost to development before these exceptions may be made, nor is there a limit on expansion of the USB. This results in allowing expansion of growth outside of the USB without ensuring that existing Habitat Conservation Plans can survive since the County has not signed onto plans such as the Natomas Basin Habitat Conservation Plan or actively sought to facilitate other such plans.

### **Open Space**

While the County General Plan Policy notes that Open Space is an essential component to reducing greenhouse gas emissions, there is little support in the CAP measures to do so. The CAP lacks details both in limiting the growth of development into undeveloped areas of the county, and in actively supporting the retention of important lands and habitat that serve as carbon sinks.

We believe that the following references substantiate the value of preserving native plant species, trees, and wetlands by establishing and maintaining open space for carbon sequestration and reducing the heat islands that are created by development.

**1) From savanna to suburb: Effects of 160 years of landscape change on carbon storage In Silicon Valley, California** [Erin E.Beller<sup>ab</sup>MaggiKelly<sup>cde</sup>Laurel G.Larsen<sup>b</sup>](#)

<https://www.sciencedirect.com/science/article/pii/S0169204619307741>

**2) Institute for Local Government – Open Space and Offsetting Carbon Emissions**

<https://www.ca-ilg.org/open-space-offsetting-carbon-emissions>

Cost Savings of maintaining open space: reduced need for energy production.

There is reference in several General Plan Policy sections of the document noting that the County should support the creation of an interconnected preserve system through mandatory mitigation and voluntary conservation targets. However, these are again not supported by CAP measures.

Page C-54 OS-1, 2: These General Plan Policies both support active protection of natural resource spaces with interconnectivity and adequate size to sustain ecosystems. There is no supportive CAP measure to

ensure that open space including areas of high habitat, woodland, and wetland value are protected and interconnected.

Page C-55 OS-4 and 6: The General Plan Policy notes “Open space acquisition shall be directed to lands identified on the Opens Space Vision Diagram” and “The County may seek to acquire land for open space purposed...”. However, there is no supportive CAP measure to ensure that these goals are accomplished including a funding mechanism for these which could include mitigation, grant fees, and the suggested offset of \$1,000 per dwelling unit fee.

Page C-56 – O-15: The General Plan Policy states “Consider density bonuses as a method of encouraging development clustering...”. This statement lacks a supportive CAP measure defining how this can be accomplished and the benefit implemented.

Additional suggestions for augmenting the CAP measures would be to focus on connecting areas outside of the County to extend the wildlife corridors along the County borders, particularly the Sacramento River Corridor and the Blue Oak woodlands in the East County. We would like to see the preservation of 8,000 acres of “total oak woodland, oak savannah, and grasslands” in the NE portion of the South Sacramento Habitat Conservation Plan above and beyond conservation targets in the East County.

### **GHG Reduction Measures**

As stated in the County’s Climate Action Plan, “On December 16, 2020, the Sacramento County Board of Supervisors adopted a resolution declaring a climate emergency. This resolution states that the Communitywide CAP shall explain the County’s approach to reduce GHG emissions to achieve carbon neutrality by 2030.” However, while Table 1 in the very beginning of the Climate Action Plan shows a reduction in County emissions by 1.6 million MTCO<sub>2</sub>e/year, the plan still predicts emissions of over 3.2 million MTCO<sub>2</sub>e/year. Currently the plan pays lip-service to the “climate emergency” and then proceeds to ignore this urgency altogether in the actual plan. Significantly more aggressive actions, including S.M.A.R.T. objectives and concrete, enforceable steps, should be identified for nearly all greenhouse gas emissions reductions measures.

Page 3, Table 1: From Table 1, many areas for GHG emissions are projected to decrease by 2030, meeting the Climate Emergency goal. A few are projected to increase, however, and this begs the question of whether the County should implement measures to address these, which include addressing off-road vehicles, and the County’s vehicle fleet.

Many of the plan’s community GHG reduction measures are education and outreach, and few of them are concrete requirements (such as building “reach” code changes as for GHG-05). For example, instead of an incentive program, require fossil-fuel based landscaping equipment be phased out by 2025 and transition to all-electric. In addition, we suggest more of the measures turn into concrete code changes and other actionable items and, in addition, that timeframes be moved up (2025 instead of 2030 implementation for Tier 4 final-rated diesel, 390 electric charging stations, 15% reduction in VMT).

Page 13: For GHG-13, this measure will consist of the County implementation of reduced minimum parking standards and shared parking requirements. We suggest the County follow the lead of the City of Sacramento and take more aggressive measures – eliminating minimum parking standards and increasing investments in public transit.

Page 14: For GHG-14, we appreciate the concrete implementation steps identified. However, no funding mechanisms are identified. As discussed in this letter, funding mechanisms should be identified for all aspects of the CAP's implementation.

Page 15: Measure GHG-17 has no timeframe. We suggest improving 30% of the projects listed in Appendix G by 2025.

Page 17: Measure GHG-21 also has no timeframe. Achieving mixed-use and transit-oriented development within existing population centers is a great goal, but climate change is an immediate and pressing action and we need rapid change now. We suggest setting a goal of implementation of some percentage of mixed-use and transit-oriented development by 2025.

Page 18: We appreciate the detailed and objective metrics included for the concrete implementation of GHG-22. However, no timeframe for developing the GIS based scoring system is provided. We suggest development by the end of 2022. All GHG measures should have this level of specific, measurable, and achievable goals, and in addition they should be time-bound.

Page 19: For GHG-23, the Infill Fee amount should be increased, on a sliding scale based on unit cost, to discourage development in locations that contribute to increased VMT and associated greenhouse gas emissions. An Infill Fee to implement infill should be combined with discouraging greenfield development in the first place.

Page 19: Related to GHG-24, increasing organic waste diversion by 2045 is an extremely long timeframe. We suggest moving this target to a sooner date, perhaps 2025 or 2030, and identifying specific measures to achieve this goal. Also see further detail from the Sacramento Climate Coalition later in this letter.

Page 20: GHG-25 also has no timeframe. Conversion of irrigation pumps to electric should be accomplishable by 2030.

### **GHG Reduction Measure - Temp**

In regards to the Measure Temp CAP recommendations we are asking for the following changes.

Page 35 Measure Temp -08: All parking lot tree coverage requirements should mandate 50% coverage within 15 years in all new lots no matter the size, and to add carbon sequestering tree selection for these areas per recommendation of the Sacramento Tree Foundation.

Page 36 Measure Temp-08: We suggest the CAP be modified to add a section requiring mandatory tree replacement, define a minimum percentage of solar and tree coverage of new parking lots, and add a note to bullet 5 re: grant funding/partnerships for new and retro-fitting existing parking lots "for purpose of commercial and residential greening actions". These suggested modifications support GHG measures 02, 04, and 05.

### **Sacramento Climate Coalition Specific Comments:**

Section 1.1 Purpose of the Climate Action Plan (Page 1): The purpose should not only be to "identify pathways ... to achieve ... emission reductions, in line with State targets ..." The purpose should be restated and identify that this is a plan to meet the December 16, 2020 Climate Emergency Declaration goal of carbon neutrality by 2030.

The overall emission reductions as outlined in the document do not approximate the Climate Declaration's goal. Figures 2-3 and 2-4 need to be revised, showing how the planned actions can meet the carbon neutrality goal by 2030. If identified measures will leave the County short of the goal - the areas in which new approaches or technology are needed should be clearly identified. This could be illustrated by two lines: one which calculates the potential emissions reductions with the actions mentioned in the Climate Action Plan, and the other showing the goal of zero by 2030 - the resultant gap should be discussed in terms of the need to identify near term actions not mentioned in the CAP but which will be needed to meet the goal.

GHG -24 p. 19 Increase Organic Waste Diversion 75% by 2045. Not only is this goal date too late, a comprehensive composting program needs to be established, not just an “increase” to deal with methane production in the landfill. Methane is much worse than CO2 in terms of harm to the environment.

**New Measure for Formal Partnership:**

**Measure:** The County will work with SMUD and the City of Sacramento and other municipalities within the County to create a formal joint partnership among the organizations with the mutual intent of eliminating all GHG emissions in the County by 2030.

**Implementation:** The County will reach out to leadership from SMUD and the city of Sacramento, and create a joint task force with participants from all three organizations, expandable to include other jurisdictions that adopt a climate emergency declaration. The taskforce should meet monthly. Opportunities to leverage scale (purchases of GHG eliminating equipment), conduct common messaging (educate the public on ongoing activities to eliminate GHG emissions), creation of new ordinances and laws to facilitate GHG reductions and other mutually beneficial activities must be identified.

**Responsibility:** Board of Supervisors

**Timeframe:** Near-term, in the next 12 months.

Page 51 – 52: In Section 4 Implementation and Monitoring Strategy (misabeled Section 5 in the Table of Contents), we strongly support the position that *“would entail internal coordination across multiple County agencies, with external partners, and interaction with the Board of Supervisors for consideration of actions that allow the CAP measures to be achieved, modified, and funded, as necessary.”*

In addition, it is recommended that the *“new full-time position that would be created as part of the CAP”* be more aptly titled, the Climate Emergency Mobilization Director (CEMD) instead of *“Sustainability Manager”*. We support this position *“reporting to the County Executive”* and the fact that *“the position would be aided by part-time support staff that will be necessary for performing the duties described in this strategy.”* We believe it may also be necessary for the CEMD to have the option to supervise county expert employees in temporary matrix full or part-time assignments to help achieve climate goals and objectives, if approved by the County CEO. It is imperative that this be an executive-level position that is able to work cross-departmentally. This position would naturally work hand in hand with the Climate Emergency Mobilization Task Force.

**New Measure for Public Education:**

There should be up-front recognition that the County will need to work hand in hand with SMUD, the City of Sacramento, and other municipalities in the County to achieve the mutual goal of achieving carbon neutrality by 2030. We are encouraging the County to create a commission with representatives of each elected governing body in the County with the sole purpose of reaching the 2030 goal. In this light we suggest that another greenhouse gas emission reduction measure be added to the plan: public education.

There are numerous references about public education in the CAP Draft on specific issues, such as:

Measure TEMP-03 p. 32 regarding: heat risks and strategies

Measure FIRE-04 p. 37 regarding: improve upon education re emergency supplies, evac routes etc.

Air Quality p. C 2-1 Appendix C re: transportation and VMT education

Energy - EN-9 p. C-38 Appendix C re: public's need to reduce auto travel

These measures are about specific topics like wildfires and air quality and are important, but public education needs to have its own section in this CAP as it is a vital part of addressing our climate crisis. There is no one category in this CAP draft that addresses the need for public education about climate change and personal and community action that can be taken by Sacramento residents.

As a community, we must engage the public to gain their buy-in and participation regarding the pressing need to remove carbon from the earth's atmosphere on a huge scale. We need to enlist the public in a massive mobilization. Public education should include:

- An overview of the Climate Emergency Plan
- Information re: local climate issues
- Alternative Energy Methods and ways residents can make a difference in terms of personal behaviors – i.e., composting, recycling, turning off lights
- Addressing the business community on their part in this effort – i.e., restaurants and food waste.

Community Engagement should be paramount in the planning of the public education process itself. Equity and social justice in the planning process itself is critical for community buy in. For example, the City of Oakland has been working on forming neighborhood leadership groups in each of the County Supervisors' districts who will work to help implement CED programs - public education, workshops, assemblies, and basic training in climate science. (Oakland 2030 Equitable Climate Action Plan -ECAP) A Climate Emergency Workforce should be created to facilitate the necessary infrastructure and public behavioral changes needed to be successful in combating climate change.

### **New Measure on Funding:**

Another section left out of the CAP, but essential for its success is sources of funding. We suggest adding a section which identifies funding to support implementation of the measures in the Climate Action Plan. In addition, we suggest establishing committees to explore the following ideas, which are successful funding mechanisms used elsewhere.

- We suggest the establishment of a CLIMATE EMERGENCY FUND. This could include mechanisms like designated fees on business licenses or a Utility User Tax aide at the largest users of natural gas. The City of Portland, Oregon has a surcharge on business licenses for the largest businesses which has generated \$30 million a year.

- The fund can be used for retrofitting homes, apartments, community solar, sustainable building projects that benefit the community and training (see Public Education above).
- Portland, Oregon has a model that involves direct work with non-profit organizations, those active in disadvantaged communities, to form a governance board of local leaders. Portland City Council oversees and ensures this governance structure is working as planned. This is an opportunity for the County to collaborate with and support the City of Sacramento on these efforts. There is also a need to replicate these same programs in County areas not covered by the City program, i.e., Arden Arcade, one of the most poverty-stricken areas that is food insecure, and currently has no farmers markets which could be located right behind one of our business centers - the Arden Mall.
- The Portland Clean Energy Fund raises \$54 to \$71 million in new annual revenue for clean energy and clean energy jobs in Portland. Nonprofit organizations, alone or in partnership with for-profit companies, schools and/or other government agencies, can apply for grants from this revenue to weatherize homes, install solar and other renewable energy projects, provide job and contractor training, expand local food production and build green infrastructure in Portland. The revenue is raised by a 1% business license surcharge on the Portland revenue generated by retail corporations with over \$1 billion in annual revenue and at least \$500,000 in Portland revenue.
- On May 8, 2018, voters in the City of Athens, OH approved the opt-out carbon fee to be charged on electric utility usage within the City. The fee was proposed as a local mechanism to adjust energy prices and account for some of the social costs of carbon that result from fossil fuel power plants supplying the utility grid. In addition, the approved ballot measure restricts all revenues collected from the fee for the future development of solar PV systems on publicly-owned buildings within the City of Athens.
- The Athens OH carbon fee only captures a small portion of the actual carbon damages resulting from the energy grid, and is therefore unlikely to cause a financial burden for most customers. The carbon fee was approved by voters at a rate of 2-mills per kilowatt hour (\$0.002/kWh). With the average household in Athens consuming approximately 800 – 900 kilowatt hours per month, the fee is expected to result in a small increase of \$1.60 – \$1.80 for the average monthly residential utility bill. However, residential or small commercial customers who use more energy than 900 kilowatt hours per month, and do not reduce their usage, can expect to pay more under the carbon fee.
- Boulder, Colorado’s Climate Action Plan Tax is the nation’s first voter-approved tax dedicated to addressing climate change. Originally passed in 2006, it was extended in 2015 to continue through March 31, 2023. It Generates approximately \$1.8 million per year. It is levied on city residents and businesses based on the amount of electricity they consume. Tax rates are different depending on the sector. Annual average costs: Residential: \$21; Commercial: \$94; and Industrial: \$9,600

### **Solar Energy:**

The Sacramento County Climate Action Plan includes many commendable points on the issue of developing renewable energy sources, including solar energy:

1. Section 2, Greenhouse Gas Reduction Strategy, page 6, states that the planning strategies considered when developing greenhouse gas (GHG) reduction measures included, “Clean Energy: focuses on providing clean and affordable sources of energy for the County by increasing the use of renewables”.

2. Section 2.2, Government Operations Greenhouse Gas Emissions Reductions, GOV-BE-02, page 24, states the measure that, “The County will offset 100 percent of its building electricity use with renewable energy. Implementation: Install on-site renewable energy systems or participate in SMUD’s commercial SolarShares and/or Greenergy programs. Responsibility: DGS.”
3. Appendix C, Sacramento County 2030 General Plan Policies Supporting Climate Action, Table C-1, General Plan Policy Text, Public Facilities Measures 76-82, pages C-59 to C-60, lists three sources of renewable energy, a dispersed system; on-site facilities; and large centralized facilities, and describes limits on where public facilities can be sited.

This focus on increasing the use of renewable energy, and the goal of offsetting 100% of electricity used by county buildings with renewable energy are truly commendable. The guidelines on development and siting of large public facilities are also commendable as they recognize and protect other important interests, such as protecting habitat, conservation areas, farm operations, environmental quality and cultural resources.

However, although the CAP is notable for setting out these measures and plans, it is also notable for the goals and measures it fails to address. These failures should be considered and addressed if the County is to reach the goal of zero GHG emissions by 2030, as it committed to doing in its Climate Emergency Declaration of December 16, 2020. We suggest the following changes and additions:

GHG-04 Energy Efficiency and Electrification of Existing Non-Residential Buildings, page 7: The County should pass ordinances and adopt incentive programs to encourage the use of solar panels on large, privately-owned buildings, such as office buildings, garages, and warehouses. This would increase the number of available locations for solar panels and would also provide shade to these buildings, which in turn would decrease the need for cooling them in hot weather.

GHG-06 Energy Efficiencies and Electrification of Existing Residential Buildings, page 7: The County should pass ordinances and develop incentive programs and grants to support adding residential solar panels to existing residential buildings and making solar energy available in multi-family housing. Battery storage capability should be included with the addition of solar panels.

We suggest a measure be added to Table 2.1 stating that the County will work with the Sacramento Municipal Utility District to develop microgrid systems, and will support this development with appropriate ordinances, incentive programs and grants. The development of microgrid systems will facilitate the addition of solar energy systems to multi-family buildings. It will also increase the efficiency and resiliency of our energy supply. In the event of emergencies or events that interrupt power deliveries, a microgrid enables energy to be transferred to the affected units. This is a valuable benefit not just for residential houses, but also for government officials who provide important services, such as police and fire departments, hospitals and other emergency workers. If power is interrupted to one unit, a microgrid connection will enable power to be transferred from other units to the affected unit. This would make our community more resilient and better protected.

**Appendix C:**

Page C-17: CO-14 is the closest CAP draft action parallel to these comments.

Utilizing digestion of wastewater from water treatment plants can recover waste heat via anaerobic digesters and the use of methane to cool buildings can also provide electricity to those same buildings. Riverside and San Diego Counties have done this, as well as using energy from microturbines. Per these counties, using self-generated power by installing biodigesters and fuel cell technology “will allow the (Water) District to run some of its water reclamation facilities for FREE, without toxic emissions, and LOWER GHG by 10,600 tons annually” (source: Sierra Club’s California Climate Emergency Resource Page)

Page C-21: Purchasing of recycled products needs an additional program:

In addition to comprehensive composting of residential food waste, a program should include waste from restaurants, catering, grocery stores as well as the usual yard waste. The County should add residential kitchen compost to the current green waste program & public education regarding composting of kitchen waste is important. This can be accomplished via the Food Hubs proposed below under Environmental Justice. The wider use of compost also increases carbon sequestration, soil vitality and can be used in community and personal gardens which also should be encouraged. Multiple composting sites can reach more communities and more jobs as well.

Reference: City of Ann Arbor’s Climate Emergency Plan has a model composting program.

Page C-21: In addition to recommending the purchase of recyclable products, a plan to aid the food industry to eliminate non-biodegradable containers and utensils should be suggested. Plastic and polystyrene (Styrofoam) take hundreds of years to degrade. If both County and City collaborate to create a bulk processing network of recyclable products, the stress and higher cost can be taken off the backs of the food industry; this action would help reduce waste, and promote degradable, eco-friendly containers, utensils etc.

Polystyrene is classified as a probable carcinogen by the WHO, creates harmful pollution when exposed to sunlight or burned leading to contaminated landfill, contributes to depleting the ozone layer and harms marine animals who ingest it. Plastic take-out containers are made from fossil fuels and have negative impacts on the environment in their production.

Page C-41: Appendix C ENVIRONMENTAL JUSTICE - EJ-1 p. C-41

“Improvement and program support for each EJ Community shall address the Community’s unique or compounded needs.” A more specific need within this General Plan statement is food insecurity. With the current COVID-19 crisis, food insecurity, a longstanding problem, has become worse and more visible. There is a need to create a network of Food Hubs and community centers with neighborhood partners that provide food distribution and education. Sources for this are: excess food from restaurants, catering businesses and grocery stores. Food that is not edible by the public, can be used for compost. Hubs can offer compost collection, as well as training on composting, reducing food waste, gardening and healthy cooking, all forms of programmatic community support.

#### **Appendix F Responses to measures left out of Draft CAP:**

Page F-2: Measure: Require all electric construction for other building types. The reason for dismissal is “duplicative of Measure GHG-05”. However, Measure GHG-05 refers to CALGreen tier 1 which is a Voluntary Measure. This measure is different because it is a requirement, and it should remain in the CAP.

Page F-2: Measure: Require all electric construction for other building types.

Reasons for rejection include, “Precedents for local government ordinances to “ban” natural gas in commercial buildings contain language that allows exemptions based on technological, economic, and political factors.” While other local government ordinances could include substantial exemption language, the County of Sacramento Board of Supervisors passed a Climate Emergency Declaration, and as such we are confident that they will uphold their goals and could pass an ordinance without substantial exemptions. This reason for dismissal is not valid.

Page F-5: Measure: Streamline permitting for electrification of existing residential and commercial buildings. The stated reason for dismissal is “it would not be appropriate to exempt a permit...” However, streamline does not mean exempt. Efficiencies can be promoted without exemption. This measure should remain in the CAP.

Page F-10: Measure: Electrification of Agriculture. The reason for dismissal is “...not feasible for the County to mandate conversion of private equipment”. However, we feel through air quality requirements, it is not only feasible for the County or partners to make such a mandate it is the responsibility of the County.

Appendix F Rain Capture: County to promote use of rain barrels and rain gardens which allow for capture of rainwater for reuse in landscaping. The stated reason for dismissal was that GHG reduction not substantiated. County departments already have similar programs and published guidance. The 2010 County rebate program for residential rain gardens refers to a website which cannot be reached. This gives the impression that the program no longer exists. At the least, a revamp to ensure information is accessible seems justified.

Page F-8 Green Jobs Training: This measure was intended to “support local efforts of colleges, universities and community-based organizations to provide green jobs training.” The stated reason for dismissal was due to concerns regarding efficacy and feasibility and the County being unsure of “what supporting green jobs would entail”. City of Sacramento analysis done by John Mitchell of Jai J Mitchell Analytics in 2018 titled: the Sacramento City Climate Mobilization (draft) Technical Implementation Plan” outlined a rapid mobilization plan that could achieve net zero greenhouse gas emissions plan over an 8-year timeline. He specified the need for a Climate Emergency Workforce, and provided some details that could help the County understand what supporting green jobs could entail. This work force would address both manpower needs and our current unemployment problem.

Page F-8: Measure: Develop McClellan as a Research Education & Job Training Facility. The stated reason for dismissal was feasibility, cost & anticipated GHG reductions, as well as the percentage of private ownership of McClellan. We suggest the County reconsider this measure. These are critical programs for the multiple anticipated crises brought on by climate change. We have seen these critical needs during the current pandemic. These programs are crucial to any CAP or CED. Also see the suggested Climate Workforce, under the suggested new measure for Public Education.

Page F-8: Measure: Renewable Energy Development Center. The stated reason for dismissal was feasibility, cost & anticipated GHG reductions. We believe that through partnership, this measure produces local jobs and brings revenue into Sacramento County.

Page F-10: Measure: County Composting Program  
Establish a program that incorporates the community food waste & green waste which then provides quality compost for the community and County’s use. The stated reason for Dismissal was due to a

similar measure, GHG-02 - Organic Waste Diversion in the CAP. This is a typo – the similar measure is GHG-24. As stated elsewhere, GHG-24 needs a much more aggressive timeframe, funding, and a concrete implementation plan or program.

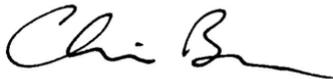
In summary, we found many of the Greenhouse Gas Emission reduction measures as well as much of the plan to be inadequate, requiring further specificity, shorter timeframes, and clearer implementation steps. To match the County’s Board of Supervisors Climate Emergency Declaration, a more aggressive Climate Action Plan is needed that recognizes the urgent nature of climate change.

The Sacramento Group of the Motherlode Chapter of the Sierra Club and the Sacramento Climate Coalition look forward to improvements in the County of Sacramento’s Climate Action Plan in the next revision. Please contact us if you have further questions or opportunities for engagement.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'BL' or similar initials, written in a cursive style.

Barbara Leary, Chairperson, Sierra Club Sacramento Group

A handwritten signature in black ink, appearing to read 'Chris Brown', written in a cursive style.

Chris Brown, Coordinator, Sacramento Climate Coalition

**Taylor. Todd**

---

**Subject:** CAP Letter  
**Attachments:** FINAL Comment Letter on March 2021 Draft .pdf

**From:** Chris Norem <[chris@northstatebia.org](mailto:chris@northstatebia.org)>  
**Sent:** Friday, April 9, 2021 3:54 PM  
**To:** Smith. Todd <[smithtodd@saccounty.net](mailto:smithtodd@saccounty.net)>  
**Subject:** Re: CAP Letter

**EXTERNAL EMAIL:** If unknown sender, **do not** click links/attachments.

Please use this one. The ABC wanted me to add "Northern California Chapter" to the first page. No substantive changes.

Best,



**Chris Norem**  
Director of Governmental & Political Affairs  
c: 916 677 9190  
w: [northstatebia.org](http://northstatebia.org)





April 9, 2021

To: Todd Smith  
Principal Planner, Office of Planning and Environmental Review  
Sacramento County  
827 7th Street, Room 225  
Sacramento, CA 95814

From: North State Building Industry Association  
Sacramento Regional Builders Exchange  
Plumbing Heating Cooling Contractors Association  
Associated Builders and Contractors

This letter offers comments from the above listed industry trade associations on the Sacramento County Climate Action Plan (CAP) March 2021 Draft. We appreciate the opportunity to provide comments on the March Draft report, and we would like to state that this letter adds to (and does not supplant) the comments in our letter of December 30, 2020.

We appreciate the opportunity to work closely and collaboratively with the county and other stakeholders on this important issue. We continue to urge the county to look at adopting a wide range of mitigation measures as potential alternatives and to allow flexibility for applicants seeking to use the CAP.

The construction industry would ask that applicants be granted the flexibility to demonstrate compliance with the CAP through a combination of the alternatives described in the March Draft or through yet-to-be-defined technologies or options that applicants may wish to present to the county as alternatives after adoption of the CAP in 2021.

As stated in our previous letter, we are pleased that the report recognizes SMUD's substantial work to meet the state's ambitious 2030 GHG reduction goals. The ASCENT report states that no additional mitigation measures are technically necessary to meet the county's proportionate share of the state's 2030 climate action goal because SMUD's already-adopted climate emergency resolution and incentives.

With that fact in mind, we would make the following observations on the specific mitigation measures, which are prioritized based on areas of greatest concern.

Residential Housing and Commercial Development Disproportionately Affected

Residential construction (new and existing) accounts for 25% of the existing baseline 2015 GHG inventory (Figure E1) but accounts for 42% of the GHG reduction contemplated by the reduction measures (Page 7).

More specifically, new homeowners are paying a disproportionate share of the costs of reducing GHG under this proposed CAP. Over the next nine years, new residents in the county will be approximately 2-3% of the population, but account for 8% of the GHG reduction measures (Table 2.1, Page 7).

Residential Construction GHG Calculation Summary	
2015-2020 Average Number of New Homes in Sac County	600
Homes produced 2021-2030. (Historic average plus 10%)	6,000
New Residents (assuming 2.66 per household census data)	15,960
Total Sac County Residents 2020	590,000
New Residents % of Current Population	2.7%
New Residents % of GHG Reduction Measures	8%

It is worth noting that new homeowners will also absorb the costs of several other mitigation measures not specifically identified as residential construction, such as GHG 23 (infill), GHG 08 (Tier 4 construction equipment) and other mitigations measures and VMT requirements that are not strictly quantified. Therefore, the 8 percent figure is a very conservative figure and it is likely that the forthcoming three percent of the population that purchases a new home will be responsible for a 9-10 percent reduction in GHG.

Similarly, commercial construction represents 18% of the current GHG load (table E1), but accounts for nearly 40% of the GHG mitigation reductions in table 2.1 (Page 7).

We would ask that the county consider options for providing GHG reductions that spread the costs more evenly among existing residents to meet a public policy goal aimed at benefiting everyone in the community.

GHG-07. Energy Efficiency in New Residential

This requires a phase out of natural gas by 2023, which is infeasible due to a lack of supply chain providers of all electric components. It is our understanding based on our conversations with county staff that this infeasibility has been confirmed.

The reason for this infeasibility is that all electric appliances are emerging technologies that now enjoy relatively little market share. Statewide, roughly two percent of all new housing is all electric. As such, a 2023 deadline would likely serve to block new homes from being sold due to the lack of available appliances. This policy is complicated by the City of Sacramento's push to adopt an all-electric policy, which will provide a competing market force that will likely absorb the small number of all-electric appliances available in the marketplace (assuming the city adopts this policy in 2021).

If both jurisdictions were to adopt these policies in 2021, it is highly likely that there would be insufficient equipment, appliances and vendors to install all-electric appliances. Therefore, it is likely that such a requirement would cause builders to shift their investments to other surrounding jurisdictions where they could bring housing product to the market, a development that risks creating longer commute times and more GHG emissions.

It is our strong recommendation that the effective date of this requirement be moved back to 2026 or later and that feasibility analysis is performed before it is implemented so as not to exacerbate the housing crisis and prevent new housing from reaching the market.

#### GHG-23. Incentivize Infill.

This measure calls for a \$1,000 per door assessment on new homeowners to create a fund to help incentivize infill as a method of meeting the state's new 15% reduction in VMT. This mitigation measure should be integrated with the County's existing VMT guidelines and should not be duplicative of those efforts. It is recommended that the fee program have accountability mechanisms for project spending, with regular Board of Supervisor updates to ensure the fees are properly addressing the goal of reducing GHG.

#### GHG-05. Energy Efficiency in New Commercial

The new statewide California Green Building Code current under development will likely include Tier 1 energy standards for commercial and will take effect on 1/1/23. The County's move to this standard one year sooner than the state would mean local county staff will have to switch to (and learn) the Tier 1 regulations for 12 months before having to implement a whole new set of state minimum regulations which will likely include mandates for fully functioning EV charging systems in all new commercial. This would also create some level of confusion and training issues for the commercial building industry with two new sets of standards less than 12 months apart from one another. Additionally, due to COVID, commercial permits are down and vacancy rates are up and many commercial projects statewide are either being postponed or cancelled, which calls into question the potential negative consequences of assessing new fees on commercial investment at this time that would incentivize builders to go to other surrounding jurisdictions without this requirement.

#### GHG-01. Carbon Farming

Since this mitigation measure is such a large component part of the county's program (48%), we would encourage the county to allow the industry to purchase credits throughout the region or

the state, or the nation from reputable carbon farming operations and not just in Sacramento County. There is a growing national awareness of this as a mitigation option and Sacramento County should avail itself of these opportunities in an effort to reduce GHG.

#### GHG-04. Electrification of Existing Commercial

This measure calls for the County to develop a program aimed at assisting local utilities with implementing commercial energy efficiency and electrification programs to achieve reductions in energy consumption with an educational outreach program. We would urge the County to provide real financial incentives provided by local, state or federal funding.

#### GHG-06. Energy Efficiency in Existing Residential

This measure calls for the County to assist local utilities with increasing participation in residential retrofit programs to achieve a reduction in energy consumption to urge consumer upgrading to EnergyStar™-certified appliances, more efficient HVAC systems, weatherization, and comprehensive whole home retrofitting. We would urge the county to consider a continued interest in finding real ways to offer financial incentives through either local, state or federal funding.

### **New Suggested Mitigation Measures**

The building industry suggests that the county consider the following alternative mitigation measures:

Tree Planting. Allow applicants to coordinate efforts with the South Sacramento Habitat Conservation Plan or the Natomas Basin Conservancy and the Tree Foundation to fund tree planting as a mitigation measure. Tree planting by the Tree Foundation has already been undertaken at the Natomas Basin Conservancy lands with measure environmental benefits.

South Sac HCP Wetlands Mitigation. This mitigation measure was removed from the prior draft, but the ability of wetlands to capture carbon suggests that this may be a worthwhile mitigation measure worth including.

#### Make Infill Approvals Ministerial In Line with the City of Sacramento

The City of Sacramento in July of 2020 approved steps to make the approval of infill a ministerial process. The county should explore such an alternative as the region is still only producing roughly 60% of the roughly 11,000 housing units that SACOG identifies as the long term yearly average.

#### Support Regional Incentives for Telework

SACOG is currently analyzing telework trends and GHG savings with the intent of potentially creating a regional platform for telework policy. The County should consider supporting this endeavor as a potential mitigation measure.

Support Investments in Broadband

In conjunction with #2 above, the county should consider incentives for broadband or other forms of high-speed internet to all communities as a method of potentially encouraging connectivity via the internet to reduce vehicle miles traveled.

Thank you for your consideration of our feedback. We look forward to continuing to provide input on the alternatives as they are developed in the coming months.

## Taylor. Todd

---

**From:** Jamie Cutlip <Jamie.Cutlip@smud.org>  
**Sent:** Friday, April 9, 2021 3:55 PM  
**To:** PER. climateactionplan  
**Cc:** Smith. Todd; Lundgren. John; Steve Johns  
**Subject:** Draft CAP - SMUD Comments  
**Attachments:** SACCo\_CAP Draft\_SMUD Comments\_4-9-21\_FINAL.pdf

**EXTERNAL EMAIL:** If unknown sender, **do not** click links/attachments.

Please find attached a comment letter from SMUD on the County's Climate Action Plan Public Draft.

Jamie Cutlip  
*Government Affairs Representative III*  
*Regional & Local Government Affairs, Office of the General Counsel*  
w.916-732-5308 | [Jamie.Cutlip@smud.org](mailto:Jamie.Cutlip@smud.org)

**SMUD** | Powering forward. Together.  
6201 S Street, Mail Stop B404, Sacramento, CA 95817



**Sent Via E-Mail**

April 9, 2021

Mr. Todd Smith, Principal Planner  
Office of Planning and Environmental Review  
827 7<sup>th</sup> Street, Room 225  
Sacramento, CA 95814  
[ClimateActionPlan@saccounty.net](mailto:ClimateActionPlan@saccounty.net)

**Subject: Comments on the County's Draft Climate Action Plan**

Dear Mr. Smith:

The Sacramento Municipal Utility District (SMUD) appreciates the opportunity to provide comments on the Sacramento County Draft Climate Action Plan (Plan). SMUD is the primary energy provider for Sacramento County (County) and the proposed Plan area. SMUD's vision is to be the trusted partner with our customers and community, providing innovative solutions to ensure energy affordability and reliability, improve the environment, reduce our region's carbon footprint, and enhance the vitality of our community.

We are pleased to see the County adopt a similar 2030 timeframe for GHG reductions, aligning with both the County's recently adopted Climate Emergency Declaration and with SMUD's own 2030 Zero Carbon Plan. Our plan identifies specified actions needed to get to zero carbon by 2030, but we cannot do this alone. Sacramento County is a critical partner to ensuring our plan's success. SMUD and the County have aggressive goals for carbon reduction and many of our initiatives overlap. We look forward to coordinated implementation and collective achievement on electrification, local carbon-free electricity development, and on other initiatives we share as common interests.

Based on our review of the County's proposed Plan policies and implementation measures, SMUD offers comments for the County's consideration. Where noted, SMUD encourages the County to consider additional policies and implementation measures.

**Section 1.2: Baseline and Forecast Greenhouse Gas Emissions**

- [Table 2: Legislation or Regional Policies Resulting in County GHG Emissions Reductions by 2030.](#)

SMUD stands for "Sacramento Municipal Utility District" and should be revised on page

to Utility in the singular on page 5. This revision is needed in the Glossary as well on page 175. Our 2030 Carbon Zero Plan was presented to the SMUD Board on March 31, 2021. After a public comment period, our final plan will be endorsed by the SMUD Board in late April 2021.

## Section 2.1: Community Greenhouse Gas Reduction Measures

- *GHG-04: Energy Efficiency & Electrification of Existing Nonresidential Buildings.*  
Although the measure title includes electrification, this description appears to favor commercial energy conservation. Instead, the County should include actively educating and supporting gas-to-electric conversions in commercial buildings for space and water heating. Such conversions will result in greater GHG reductions than through conserving both natural gas/ propane and electricity. Secondly, SMUD is shifting our rebate programs to increasingly support such gas to electric conversions in existing and in new all-electric development. SMUD offers many tools and resources that can be shared through County channels to help educate business owners and commercial customers. This measure should be revised to a near-term action rather than the long-term identified timeframe.
- *GHG-05: Increase Energy Efficiency in New Commercial Buildings.*  
While the County should be commended for considering the CalGreen Tier 1 efficiency standards to be adopted in the near-term, we strongly urge the County to reconsider adding electrification of space and water heating for new commercial construction or “electric-ready” requirements to the Plan now. If buildings are not electrified or made all-electric ready in this Plan, there will be a much higher cost for the building owner to retrofit these buildings to all-electric at a later date.
- *GHG-06: Energy Efficiency & Electrification of Existing Residential Buildings.*  
Although the measure title includes electrification, this description appears to favor residential electricity and natural gas / propane conservation. Instead, the County should include actively educating and supporting gas-to-electric conversions in residential buildings for cooking, space and water heating. Such conversions will result in greater GHG reductions compared to energy conservation. Secondly, SMUD is shifting our rebate programs to increasingly support such conversions in existing construction and in new all-electric development. SMUD offers many tools and resources that can be shared through County channels to help educate homeowners and residential customers.
- *GHG-07: Eliminate Fossil Fuel Consumption in New Residential Buildings.*  
We applaud the County for including this measure and request reconsideration of a similar measure for new commercial buildings. Cost-effectiveness studies show that all-electric new construction for [low-rise](#), [mid-rise](#) (4-7 stories) and [high-rise residential](#) (8 stories and up) can be cost effectively built today.
- *GHG-19: EV Parking Code.*  
To further support greater GHG reductions in the transportation sector and to create consistency of requirements within the region, the County may want to consider higher minimums to match what is being proposed within the City of Sacramento of 20% of required parking spaces to be EV Capable with at least one installed, operational Level 2 charger or consider EV parking minimums found in the CalGreen Tier 2 standards. Adding higher minimum EV parking requirements support greater GHG emission

reductions, achieves broader inclusion of EVs in multi-family developments when it is most cost-effective, at the time of new construction vs retrofit. Also, please note that SMUD EV infrastructure program incentives require spaces to be stubbed out or have a Level 1 or 2 charger installed to qualify.

## **Section 2.2: Government Operations Greenhouse Gas Reductions**

- *Charging as a Service.*  
SMUD looks forward to supporting the County by providing Fleet Advisory Services upon program launch to enable the development of short and long-term fleet electrification plans as well as a soft launch of the Charging as a Service program with a County EV infrastructure project.

## **Section 3: Climate Change Adaption Strategy**

- *FLOOD-07: Establish an Underground Utilities Program Resistant to Flooding.*  
This measure warrants further discussion as existing mitigation measures, such as enhanced above ground design and construction standards, relocation, preventative monitoring, infrastructure inspections and maintenance, may already serve the intended goal and would be more cost-effective than establishing an undergrounding utilities program.

Secondly, SMUD's System Enhancement Strategic Directive already offers undergrounding or permanent relocation of existing primary lines when feasible and determined to be in the public's interest. The County is eligible for this program. Please see SMUD's [Strategic Direction SD-14](#) for more information. Finally, the description of benefits includes outdated references to temperature and wildfire measures (Temp-6 and Fire-7) that were included in the administrative draft and are no longer included in this public draft.

## **Appendix F – Measures Considered but Eliminated from the Climate Action Plan**

- *SMUD Greenergy – Residential & Commercial.*  
SMUD is developing its 2030 Zero Carbon Plan to eliminate GHG emissions from our electricity generation by 2030. Even if the County decides to not offer an incentive for participation, SMUD's Greenergy Programs should still be considered for Residential and Commercial buildings. We will continue to offer the Greenergy program until Zero Carbon can be achieved and are looking to expand the program with additional participation tiers in the near term. The County can assist in increasing program participation.
- *Streamline Permitting for Electrification of Existing Residential and Commercial Buildings.*  
Although this measure is purposed for elimination, we look forward to partnering with the County to identify and resolve barriers to gas-to-electric conversions within existing residential and commercial buildings that may stem from the permit review process.
- *Require All Electric Construction for Other Building Types.*  
We strongly urge the County to reconsider adding "electric-ready" or electrification of space and water heating for new commercial construction to the Plan now as each

newly constructed commercial building that is not addressed will need to be retrofitted at a higher cost later on. Cost-effectiveness studies show that all-electric new construction for low-rise [commercial, mid-rise](#) (4-7 stories) and [high-rise residential](#) (8 stories and up) can be cost effectively built today.

As environmental leadership is a core value of SMUD, we look forward to collaborating with you on this Plan. We aim to be partners in the efficient and sustainable delivery of the proposed Plan.

Again, we appreciate the opportunity to provide input on the public draft of the County Climate Action Plan. SMUD would like to stay involved and is available to discuss any of the above areas of interest and any other potential issues.

If you have any questions regarding this preliminary review, please contact me at [Jamie.Cutlip@smud.org](mailto:Jamie.Cutlip@smud.org) or (916)732-5308.

Sincerely,



Jamie Cutlip  
Government Affairs Representative III  
Regional & Local Government Affairs  
Sacramento Municipal Utility District

Cc: John Lundgren, County of Sacramento  
Todd Taylor, County of Sacramento

## Taylor. Todd

---

**From:** Crawford. Piper  
**Sent:** Friday, April 9, 2021 2:25 PM  
**To:** PER. climateactionplan; Smith. Todd  
**Cc:** Dobson. Christoph; Mitchell. Terrie; Ocenosak. David; Oriol. Heidi; Nebozuk. Steven; Ramirez. Jose; Taylor. Todd; Lundgren. John; Dan.Krekelberg@ascentenvironmental.com; honey.walters@ascentenvironmental.com  
**Subject:** Regional San & SASD Comments to County CAP  
**Attachments:** RegionalSanCommentLetterFINAL\_040921.pdf

Good afternoon,

On behalf of Regional San and SASD, I am submitting a comment letter responding to the draft Climate Action Plan released by Sacramento County. Should you have any questions or concerns, please let me know.

Thank you,  
Piper

**Piper Crawford, EIT**

*Assistant Civil Engineer | Policy & Planning*  
Sacramento Regional County Sanitation District &  
Sacramento Area Sewer District  
10060 Goethe Road  
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**Board of Directors**

Representing:

**County of Sacramento**

**County of Yolo**

**City of Citrus Heights**

**City of Elk Grove**

**City of Folsom**

**City of Rancho Cordova**

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Prabhakar Somavarapu

*District Engineer*

Glenn Bielefelt

*Director of Operations*

Christoph Dobson

*Director of Policy & Planning*

Matthew Doyle

*Director of Internal Services*

Joseph Maestretti

*Chief Financial Officer*

Nicole Coleman

*Public Affairs Manager*

[www.regionalsan.com](http://www.regionalsan.com)

April 9, 2021

Todd Smith  
Principal Planner  
Office of Planning and Environmental Review  
827 7<sup>th</sup> St  
Sacramento, CA 95814

Sent via email to: [ClimateActionPlan@saccounty.net](mailto:ClimateActionPlan@saccounty.net)

**Subject: Regional San & SASD Comments to Sacramento County CAP**

Sacramento Regional County Sanitation District (Regional San) and Sacramento Area Sewer District (SASD) appreciate the opportunity to provide comments on the County of Sacramento (County) Climate Action Plan (CAP). Regional San owns the Sacramento Regional Wastewater Treatment Plant (SRWTP) in Elk Grove and treats an average of 124 million gallons of wastewater daily. Together, Regional San and SASD operate nearly 4700 miles of pipeline and 142 pump stations across the Sacramento region to safely convey wastewater to the SRWTP. The Districts serve more than 1.6 million customers daily. Protecting such a large public investment from climate change impacts is imperative and both Districts recognize the importance of establishing a countywide CAP.

We appreciate the County and Ascent Environmental's efforts on developing the draft CAP, as well as their willingness to meet with both Districts the last week of March to discuss our comments. In order to provide full transparency, Regional San and SASD would like to reiterate our comments on the overarching concerns brought up in the meeting. I am also attaching the references made to Regional San and SASD in the CAP for convenience. We look forward to discussing specific rewording and edits for each of the references in a future meeting, but prior to finalizing the CAP, as there are inaccurate statements that need to be addressed.

Regional San and SASD serve customers throughout unincorporated Sacramento County, the cities of Citrus Heights, Elk Grove, Folsom, Rancho Cordova, Sacramento and West Sacramento, and the communities of Courtland and Walnut Grove. Regional San is governed by a 17-member Board of Directors made up of the County Board of Supervisors as well as representatives from the cities. SASD is overseen by a 10-member Board of Directors consisting of five members from the County Board of Supervisors and five representatives from the cities of Citrus Heights, Elk Grove, Folsom, Rancho Cordova and Sacramento. Given that neither District is under the direct operational control of Sacramento County, climate change adaptations and mitigations associated with the conveyance and treatment of wastewater are to be independently managed by Regional San and SASD. Because of this, both Districts respectfully request that Regional San and SASD not be identified as responsible parties in the Sacramento County CAP.

Todd Smith  
April 9, 2021  
Page 2

We hope that the above comments will be considered in the development and implementation of the Sacramento County CAP. We look forward to working with the County to reword the references to Regional San and SASD to be geared more towards collaboration rather than as responsible parties.

If you have any questions please contact me at (916) 876-6118 ([nebozucs@sacsewer.com](mailto:nebozucs@sacsewer.com)).

Sincerely,

DocuSigned by:



CF5503499AD2415...

Steve Nebozuk  
Senior Civil Engineer

Attachment: Sacramento County CAP District References

cc: Christoph Dobson  
Terrie Mitchell  
Dave Ocenosak  
Heidi Oriol  
Jose Ramirez  
Piper Crawford  
Todd Taylor, Office of Planning and Environmental Review  
John Lundgren, Office of Planning and Environmental Review  
Dan Krekelberg, Ascent Environmental  
Honey Walters, Ascent Environmental

Todd Smith  
 April 9, 2021  
 Page 3

Agency	Page Number	Section	Districts Listed as Responsible Parties?	Reference
Regional San	Page 6	Existing Regional Actions		Regional San Sustainability and Innovation programs, which reduce GHG emissions from wastewater produced by Sacramento County residents through water, biogas, biosolids recycling. (taken from our website)
Regional San	Page 40	Climate Change Adaptation Strategy: Prepare for Increased Drought	Y (Regional San)	Coordinate with the Sacramento Regional County Sanitation District (Regional San) or other appropriate agencies to develop a standard to deploy innovative options to meet future water demand for all County-owned facilities (e.g., reclaim and purify wastewater, on-site graywater reuse systems, or use of recycled water from the regional or local treatment plants).
Regional San	Page 41	Climate Change Adaptation Strategy: Prepare for Increased Drought	Y (Regional San)	Partner with Regional San to expand the existing recycled water system service areas by 50 percent.
Regional San SASD	Page 43	Climate Change Adaptation Strategy: Prepare for Increased Flooding	Y (Regional San & SASD)	Improve sewage and solid-waste management infrastructure to reduce vulnerabilities to flooding and inundation, especially within older portions of the County where infrastructure is undersized or inadequate.
Regional San	Page 49	Climate Change Adaptation Strategy: Prepare for Sea-Level Rise	Y (Regional San)	Following the completion of Measures SLR-1 and SLR-3, update capital improvement plans for critical infrastructure to address the effects of future sea-level rise and associated hazards in potentially affected areas. SLR-1: Coordinate with the applicable Reclamation Districts (RDs), FEMA, and CA DWR to regularly update floodplain mapping for potentially affected areas to reflect changes in Base Flood Elevations that account for sea-level rise. Partner with the applicable RDs to establish measures to protect populations, functions, and structures within the affected areas including continued maintenance of RD levee systems and relocation of vulnerable communities, infrastructure, and facilities where applicable. SLR-3: Require that future updates to the County's LHMIP incorporate a comprehensive evaluation of sea-level rise in the County and associated risk management processes as the degree of sea-level rise manifests and as more data becomes available.
Regional San	C-33	Appendix C: Delta Protection		Partner with Sacramento Regional County Sanitation District and other partners to promote and encourage the use of recycled water for agricultural, habitat and water conservation purposes where feasible.
Regional San	C-40	Appendix C: Energy		Coordinating and encouraging appropriate federal, state, county, and other local governmental agencies to conserve energy in water treatment and wastewater treatment and reclamation. Reference to GHG-25: Electric Irrigation Pump (though no reference to wastewater/Regional San here).
Regional San		Appendix E		Scales a conservative estimate of GHG emissions due to wastewater treatment to a 2030 number

## Taylor. Todd

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**Subject:** Sac Metro Air District comments on the CAP  
**Attachments:** Sacramento County CAP\_Sac Metro Air District Comments.pdf

**From:** Rachel DuBose <[RDubose@airquality.org](mailto:RDubose@airquality.org)>  
**Sent:** Friday, April 9, 2021 4:00 PM  
**To:** Smith. Todd <[smithtodd@saccounty.net](mailto:smithtodd@saccounty.net)>  
**Cc:** Paul Philley <[PPhilley@airquality.org](mailto:PPhilley@airquality.org)>; Rachel DuBose <[RDubose@airquality.org](mailto:RDubose@airquality.org)>; Karen Huss <[KHuss@airquality.org](mailto:KHuss@airquality.org)>; Shelley Jiang <[SJiang@airquality.org](mailto:SJiang@airquality.org)>; Molly Wright <[MWright@airquality.org](mailto:MWright@airquality.org)>  
**Subject:** Sac Metro Air District comments on the CAP

Todd,  
Attached are the Sac Metro Air District's comments on the public draft of the Sacramento County Climate Action Plan. Please let me know if you have questions.  
Best regards,  
Rachel DuBose

**Rachel DuBose**  
Air Quality Planner/Analyst  
Desk: (916) 874-4876  
[www.AirQuality.org](http://www.AirQuality.org)





April 9, 2021

**SENT VIA E-MAIL ONLY**

Todd Smith, Principal Planner  
Sacramento County Office of Planning and Environmental Review  
727 7<sup>th</sup> Street, Room 225  
Sacramento, CA 95814  
[smithtodd@saccounty.net](mailto:smithtodd@saccounty.net)

**Re: Sacramento County Draft Communitywide Climate Action Plan**

Mr. Smith,

Sacramento County released the Draft Communitywide Climate Action Plan (draft CAP or CAP) for public review on March 8, 2021. The draft CAP represents the County's commitment to implement Mitigation Measures CC-1 and CC-2 of the 2030 General Plan, and to respond to the County's adoption of a Climate Emergency Resolution in December 2020. The draft CAP focuses on reducing greenhouse gas (GHG) emissions from communitywide activities and government operations through a suite of policies, programs and aspirations. The draft CAP also contains a Climate Adaptation Strategy to address vulnerabilities to climate change impacts such as the effects of extreme heat and sea level rise.

The Sacramento Metropolitan Air Quality Management District (Sac Metro Air District) commends the County for undertaking the momentous task of developing a climate action plan, and we are pleased to provide the following comments and suggestions.

**General Comments**

- It is of utmost importance to establish a mechanism to monitor the CAP's progress toward achieving each measure's quantified target, as well as cumulative GHG reductions at set years, and to require amendment if the CAP is not achieving specified levels (also known as contingency or fallback measures). In addition to ensuring the CAP's success, ongoing monitoring can help ensure that proposed land use development projects are eligible for streamlining under the California Environmental Quality Act (CEQA).
- While many of the draft CAP's measures can effectively reduce GHGs, the implementation strategies lack detail and instead focus on soft actions such as education, outreach, and promotion. Most measures do not have concrete, enforceable requirements, policies, ordinances, or other hard mechanisms necessary to achieve quantifiable reductions. Moreover, for many measures, responsibility and leadership are devolved onto partner organizations and programs. Ultimately, these measures rely

upon voluntary actions by the community in response to the County's outreach efforts, but behavior change is extremely difficult and requires considerable investment in marketing, public relations agencies, and advertisements to effectively make an impression amidst the inundation of information that surrounds us. Without a doubt, it is possible to achieve the GHG emissions reductions estimated from building retrofits, for example, but at the current level of implementation suggested in the draft CAP, it appears unlikely that these specific strategies could lead to the levels of action and participation needed. To fully support its declaration of a climate change emergency, the County should develop mandatory strategies that would help deliver real, ambitious reductions.

- Measures proposing modification of Sac Metro Air District rules or involvement with Sac Metro Air District staff or programs must be discussed with air district staff, with citations of the discussions in CAP footnotes or endnotes. The measures include GHG-09 (Electric Landscaping Equipment) and GHG-25 (Electric Irrigation Pumps). As far as we are aware, such discussions have not occurred.
- The County's carbon neutrality target should be more explicitly discussed in the document's introduction.
- The Sac Metro Air District recommends that the County provide additional detail regarding the County's population estimates and the 2030 targets for Community and Government operations as reported in Appendix E. It is unclear what the targets are: the 4.8 metric tons of carbon dioxide equivalents (MT CO<sub>2</sub>e) per capita noted in Section 1.3 or Appendix E's 4.0 MT CO<sub>2</sub>e per capita?
- The Sac Metro Air District recommends using the terms "cleaner, more sustainable" in place of "alternative" throughout the document, since alternative fuels could in fact be more emissive and less sustainable. For example, a Sustainable Planning Strategy noted in Section 2 could read: "Support electrification and cleaner, more sustainable alternative fuels in on-and off-road vehicles and equipment, as well as fuel efficiency measures that would reduce the amount of gasoline and diesel fuel consumed."
- The Sac Metro Air District would like to review the detailed methodology underlying the quantified reductions. The technical documentation that was provided to us upon our request does not include detailed calculations.

## **Comments on Section 2.1, Community Greenhouse Gas Reduction Measures**

### **GHG-01: Carbon Farming (p.8)**

The County is relying on this measure to deliver nearly 50 percent of its reductions, but we have concerns with this measure. Soil carbon sequestration is inherently uncertain: a ton of carbon emissions reduced is permanently avoided, but a ton of carbon sequestered can be released in the future due to land use change, development, changes in soil management practices, or other disturbances. The carbon stored in no-till farms are largely lost again, for example, if the land is tilled again; fallowed land, too, will lose its stored carbon if the land returns to agricultural use.<sup>1</sup> For this strategy to be effective, the County must be able to guarantee permanence – that the agricultural lands will not be developed, and that any adopted farming practices be maintained for decades, if not more. We recommend agricultural easements, preserves, or other permanent mechanism to ensure consistent land use in carbon farming areas.

Carbon farming comes with other challenges. The costs of measurement and verification of soil carbon storage can be high; the County should consider who will pay for these costs, and the

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<sup>1</sup> <https://thebreakthrough.org/issues/food/carbon-farming>

timeframe over which it will be measured, which, again, leads back to the permanence question. What happens if the land is sold, developed, or the farmer or rancher decides to abandon carbon-farming practices at the end of the measurement period? As carbon sequestration cannot be guaranteed with certainty to be permanent, and no emissions are being reduced, only removed from the atmosphere (temporarily), this should not count as a carbon reduction strategy without significant changes. If this is intended as offsets to help meet the County's carbon neutrality goal, note that the California Air Resources Board requires offsets generally to be permanent, real, verifiable, and quantifiable.

These caveats aside, this measure contains only light actions such as providing education on co-benefits and available resources and is generally lacking in detail. It seems unlikely that without more robust actions – such as direct incentives or prescriptive regulation from the County – that a sufficient scale of farmer participation will be mobilized to achieve the quantity of carbon sequestration currently envisioned.

We recommend the County consider augmenting this measure with more direct strategies, such as financial incentives, policies, and ordinances to minimize or eliminate farmland conversion from land use development, and strategies to expand compost use. Farmers and other stakeholders will likely need financial mechanisms to provide compensation for any losses, should any change in practice (e.g., organic composting) result in a decline in yield. This type of insurance can help assuage any hesitancy stakeholders may feel about the risks of adopting new practices.

The County should also develop interim targets for carbon farming acreages, as well as contingency strategies should participation in carbon farming practices remain low.

#### **GHG-02: Urban Forestry (p.8)**

This measure commits the County to maintaining and enhancing the urban forest to provide shading for energy conservation and urban heat island reduction to achieve 1,681 MT CO<sub>2</sub>e per year by 2030. It is worth noting that the lower temperatures afforded by a robust urban forest contribute to improved air quality by reducing ground level ozone formation from motor vehicles, which forms in the presence of sunlight.

The County should clarify if the assumed CO<sub>2</sub>e reductions come from carbon sequestration only, or also from building energy use reductions as a result of direct tree shading as well as overall heat island reduction.

The Target Indicator states that the County will “track projects where the County has participated in preserving or adding to the urban forest” but does not commit to tracking projects that do *not* preserve or add to the urban forest. This is important because many projects include tree removal. Tracking removals, tree deaths, and preservations within the same program is necessary to gauge overall progress and net gains in urban forestry.

Also, the measure needs interim or annual tree-planting targets and a fallback mechanism in case the County does not achieve 1,681 MT Co<sub>2</sub>e per year by 2030.

Finally, the County should also consider prioritizing planting trees on public lands or commercial lands to reduce the burden of tree maintenance for individual households.

#### **GHG-04: Energy Efficiency and Electrification of Existing Nonresidential Buildings (p.9)**

Like GHG-01, this measure relies largely on education and outreach, without any enforceable or required measures. Energy efficiency upgrades and building electrification *can* deliver significant greenhouse gas emissions reductions as well as savings for building occupants, but it is unclear if the County's strategy will effectively persuade building occupants to undertake such actions. Effective outreach depends on more than developing videos; it also depends on a good marketing strategy, well-phrased communications, and enough funding. There are already many videos on the internet regarding energy conservation – what would make the County's videos different, better, or have broader reach?

We recommend the County consider a more detailed implementation strategy with mandatory requirements to achieve this measure's goal. Potential triggers for retrofits and electrification can include point-of-sale, renovations, the rental inspection ordinance, and building additions exceeding a certain threshold.

#### **GHG-05: Increase Energy Efficiency in New Commercial Buildings (p.9)**

The measure states that it will also include new high-rise buildings, but the term is not reflected in the title of the measure.

#### **GHG-06: Energy Efficiency and Electrification of Existing Residential Buildings (p.10)**

The implementation details for this measure do not include electrification – we suggest the County explicitly call out whole-home electrification and its benefits, and collaborate with SMUD on home electrification programs, education, and incentives. We also recommend that the County include cool walls in its list of recommended or incentivized actions: cool walls help to lower building temperature in the summertime by reflecting solar heat, which also reduces energy costs. Particularly for older homes, painting exterior walls with a cool paint – which comes in a range of colors – is significantly less expensive and less involved than improving wall insulation. We also recommend the County consider including cool roof rebates for retrofits and renovations. Potential triggers for weatherization, retrofits, and/or electrification can include rental inspection ordinances, point-of-sale requirements, renovations, and building additions exceeding a certain threshold.

Like the comment for GHG-04, it is unclear how videos would be a good use of County resources or would differentiate themselves from the myriad existing videos on the internet.

#### **GHG-07: Eliminate Fossil Fuel Consumption in New Residential Buildings (p.10)**

The Sac Metro Air District commends the County for striving to improve community health and the environment through this measure, which is consistent with the Sac Metro Air District's greenhouse gas emissions best management practice (BMP 1) for new projects with no natural gas infrastructure.

The Sac Metro Air District encourages the County to consider a CAP measure requiring all electric construction for other building types. In September 2018, Governor Brown signed Executive Order (EO) B-55-18, which established a new statewide goal “to achieve carbon neutrality as soon as possible, and no later than 2045, and achieve and maintain net negative emissions thereafter.” Further reducing natural gas use would be consistent with EO B-55-18 and the Statewide Scoping Plan and is of utmost importance since Sacramento County already exceeds its inventory for natural gas with existing development as calculated in the Sac Metro Air District's GHG thresholds inventory work. Moreover, natural gas appliances contribute significantly to poor air quality in Sacramento County, producing 470 tons of carbon monoxide,

106 tons of NO<sub>2</sub>, and 716 tons of NO<sub>x</sub> per year.<sup>2</sup> However, the County dismissed such a measure in Appendix F (Measures Considered but Eliminated from The Climate Action Plan) stating: “Cost effectiveness for reach all electric buildings has not been broadly demonstrated for all commercial building types. Precedents for local government ordinances to ‘ban’ natural gas in commercial buildings contain language that allows exemptions based on technological, economic, and political factors.” An ordinance eliminating natural gas from non-residential buildings would provide certainty that greenhouse gas emissions from that sector will be reduced, either on-site or off-site if the County, working with a project proponent, determines it is not feasible for the commercial building type being proposed to eliminate natural gas usage.

#### **GHG-08: Tier 4 Final Construction Equipment (p.11)**

This measure intends to reduce emissions from diesel-powered construction equipment by requiring EPA-rated Tier 4 final diesel engines in new construction projects, where feasible, and directs project applicants to provide a list of equipment prior to building permits. Because engine technologies and EPA classifications may evolve over time, we caution against constraining the measure to Tier 4 engines. We also recommend that the construction lists be required prior to approval of grading or improvement plans instead of prior to building permits, since grading is usually the most emissive construction activity. Our concerns could be resolved with the following suggested revisions shown in underline and strikeout: “*EPA-rated Tier 4 final diesel engines or cleaner required in new construction projects when electric-powered construction equipment is infeasible or unavailable. Applicants will include Tier 4 final engines or cleaner in construction lists prior to approval of grading or improvement plans ~~building permits.~~”*

The Target Indicator requires that 100 percent of Tier 4 final construction be Tier 4 by 2030. How will the County know that it is on track to achieve the stated 6,370 MT CO<sub>2</sub>e by 2030? Will it require a certain percentage of equipment to be Tier 4 final in earlier years, ramping up to 100% in 2030? In addition, please the tracking mechanism that will be used.

#### **GHG-09: Electric Landscaping Equipment (p.11)**

This measure states that the County will work with SMAQMD [Sac Metro Air District] to establish a landscaping equipment incentive program. Any measure proposing modification of Sac Metro Air District rules or involvement with Sac Metro Air District staff or programs must be discussed with air district staff. As far as we are aware, such discussions have not occurred.

#### **GHG-12: Transportation System Management Plan for Non-Residential Projects (p.12)**

The Sac Metro Air District commends the County’s commitment to review and update Section 5.9.6.F of the Zoning Code requiring a Transportation System Management Plan (TSM Plan) for new non-residential development projects. The County has had difficulty enforcing and monitoring the current TSM Plan requirements, so we are pleased that the draft CAP commits to a review and update of the zoning code. By reducing vehicle trips, TSM Plans not only reduce greenhouse gases; they also reduce emissions of ground-level ozone precursors.

This measure and the updated ordinance must describe contingency measures to be taken if the County is not on track to meet the 15,750 MT CO<sub>2</sub>e reduction commitment by 2030.

#### **GHG-13: Revise Parking Standards for Non-Residential Development (p.13)**

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<sup>2</sup> <https://coeh.ph.ucla.edu/effects-residential-gas-appliances-indoor-and-outdoor-air-quality-and-public-health-california>

The County should eliminate parking minimum requirements altogether, allowing developers and the market to determine the right amount of parking to provide.

**GHG-21: Update Community and Corridor Plans (p.17)**

This measure commits to updating Community Plans and Corridor Plans but does not specify when updates will occur other than it being a mid-term goal. The measure should specify the triggering mechanisms for plan updates. For example, will the County review them all at once, or when a development within the boundaries is proposed?

**GHG-19: EV Parking Code (p.17)**

The Sac Metro Air District encourages the County to require minimum EV charging capability in multi-family residential and commercial projects consistent with Tier 2 Standards contained in the CALGreen Code rather than Tier 1 and require the spaces to be EV ready rather than EV capable. Tier 2 Standards with EV ready spaces would be consistent with the Sac Metro Air District's greenhouse gas emissions best management practice regarding EV infrastructure (BMP 2) and would be more supportive of CAP measure GHG-10, Electric Vehicle Infrastructure Program, by providing more spaces ready to accept EV charging equipment. Additional EV infrastructure would help the Sacramento Region achieve its SB 375 targets in the 2020 Metropolitan Transportation Plan/Sustainable Communities Strategy, which anticipates higher EV penetration rates than projected by the state.

**GHG-24: Increase Organic Waste Diversion (p.19)**

Additional composting sites may be difficult to permit due to VOC emissions and other issues. Please work with the Sac Metro Air District to identify potential barriers and solutions should the County move forward with this measure.

**GHG-25: Electric Irrigation Pumps (p.20)**

This measure states that the County may work with SMAQMD [Sac Metro Air District] to convert stationary diesel- or gas-powered irrigation pumps to electric pumps that are either connected to the grid or use off-grid alternative/renewable energy sources, such as solar. Any measure proposing modification of Sac Metro Air District rules or involvement with Sac Metro Air District staff or programs must be discussed with air district staff, with citation of discussion in draft CAP footnotes or endnotes. As far as we are aware, such discussions have not occurred.

**GOV-EC-01: Employee Transportation Program (p.21)**

This measure commits to improving the County employee commute transportation program. One of the ways the County intends on identifying improvements is to review feedback from an employee survey conducted in 2010. The Sac Metro Air District recommends that the County conduct an updated survey.

**GOV-FL-01: Fleet Conversion Program (p.23)**

This measure says it will convert the entire County fleet to alternative low-carbon fuels, electricity, fuel cells, and other technologies, but the target indicator only mentions that 30 percent of new fleet purchases will be EVs by 2030. What is the timeline for the County to convert its entire fleet, and what are the other interim targets that will get to 100 percent?

**GOV-BE-01: Green Building Policy (p.24)**

The measure calls for the County's new buildings to exceed the energy performance of the 2019 California Energy Code by 10 percent. This measure should be benchmarked to the current edition of the Energy Code in effect at the time of construction.

**Other Measures Not Quantified, Measure: Electric Agricultural Equipment (p.27)**

This measure states that the County may work with SMAQMD [Sac Metro Air District] to provide incentives for replacing gas- or diesel-powered agricultural equipment with electric or alternatively fueled equivalents. As discussed previously in this letter, the Sac Metro Air District recommends using the terms “cleaner, more sustainable” in place of “alternative”, and measures proposing modification of Sac Metro Air District rules or involvement with Sac Metro Air District staff or programs must be discussed with air district staff, with citation of discussion in draft CAP footnotes or endnotes.

### **Section 3. Climate Adaptation Strategy**

#### **Extreme Heat:**

The Sac Metro Air District appreciates the County adopting some of the strategies from its Capital Region Urban Heat Island Reduction Plan into the CAP.

We offer the following additional strategies to consider:

- Develop an emergency heat health response plan, with clear heat index thresholds for triggering escalating levels of response actions from county departments.
- Provide free transportation to cooling centers.
- Provide funding to community-based organizations and other service organizations to establish ad-hoc cooling centers in spaces community members are already familiar with.
- Provide additional information, education, and recommendations on cool walls, which can help to cool buildings as well as reduce the urban heat island effect. The Cool Roof Rating Council is currently developing a rating system for cool paints, and the Lawrence Berkeley National Lab has additional research related to cool walls: <https://heatisland.lbl.gov/coolscience/cool-walls>.
- Establish additional parks, community gardens, and green spaces in low-income and under-served communities, which are both more likely to have high levels of paved surfaces and to be vulnerable to heat impacts. Parks and green spaces can help to reduce the urban heat island effect, while providing a gathering space for neighbors, promoting social resilience – a key element in extreme heat response.
- In TEMP-03, please consider using a generic term such as places of worship or religious building instead of church.
- Finally, we recommend that the County also partner with the Capital Region Climate Readiness Collaborative, a regional network of agencies, organizations, and other stakeholders that are working to elevate the region’s response to extreme heat and other challenges.

#### **Wildfire:**

- We recommend an additional strategy to address the air quality and smoke impacts of wildfire season. The County should coordinate with SMAQMD and develop a wildfire smoke response plan that provides specific triggers for action at different AQI levels and focuses on protecting the health of the most vulnerable, including youth, seniors, and outdoor workers. Potential guidance could address the safety of outdoor employees, mask-wearing, outdoor activities, and other topics. Like cooling centers, the County should work with schools, community-based organizations, local businesses, places of worship, and other community destinations to set up clean air centers, such as by providing funding to support the purchase of MERV-13 or higher rated air filters or CARB-certified air-cleaning devices. The County should also have effective coordination

across its internal departments and with school districts and other departments to ensure clear, consistent, multi-channel messaging.

- Consider recommending California's fire-resistant building code for homes located in high wildfire severity zones, not just very high zones.

### **Drought:**

- The County should also evaluate the impact of drought on Sacramento County levees, as prolonged drought can weaken levees by causing subsidence and internal levee erosion below the surface.<sup>3</sup>

### **Flood:**

- Many of the measures here, such as FLOOD-01 through 05, should be prioritized in environmental justice, low-income, and other vulnerable communities, as identified by AB 1550, CalEnviroScreen, Opportunity Zones, Promise Zones, and median household income. Low-income and formerly redlined communities have historically had lower levels of investment and development, including in their stormwater infrastructure, rendering these neighborhoods more vulnerable to localized flooding. Additionally, lower-income residents are more vulnerable to natural disasters, and have less capacity, savings, and resources to respond and recover. Finally, disaster damage to lower-income communities is often undervalued as damage costs are typically estimated in terms of property value, which is typically lower in low-income communities, and thus, recovery and disaster response funding is more likely to go to higher-income areas.
- FLOOD-11: This measure is about naturalizing existing concrete river channels, but it starts with "Identify and construct concrete channels..."

## **Appendices**

### **Appendix C, Sacramento County 2030 General Plan Policies Supporting Climate Action**

Sac Metro Air District recommends the County update General Plan Policy AQ-4 in Appendix C with the most current version, adopted in December 2020, which includes reference to the Sac Metro Air District's greenhouse gas emissions thresholds of significance. Additionally, the County should list CAP measures that are supportive of AQ-4 including GHG-07, GHG-11 and GHG-19.

### **Appendix H, Glossary**

The Sac Metro Air District requests that SMAQMD be added to the Glossary and defined as the Sacramento Metropolitan Air Quality Management District. Additionally, Sac Metro Air District encourages the County to review the following glossary terms: CRC/CRCRC (both abbreviations are used in the document), Commercial, GIS and PG&E.

## **Conclusion**

The Sac Metro Air District again commends the County for undertaking the task of developing this draft CAP. The County has set itself ambitious goals for the next ten years, and we believe that with additional refinement and improvement, this document can help set Sacramento County on a path of sustained progress toward achieving carbon neutrality, healthier and more sustainable quality of life for all its residents, and a climate-resilient economy and community.

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<sup>3</sup> <https://www.earthmagazine.org/article/protracted-drought-threatens-california-levees>

The Sac Metro Air District looks forward to collaborating with the County on the programs needed to help realize these goals.

Finally, the Sac Metro Air District looks forward to seeing General Plan updates, zoning updates and other programs designed to support the greenhouse gas reductions committed to in the CAP.

Thank you for your attention to these comments. If you have questions, please contact Rachel DuBose at [rdubose@airquality.org](mailto:rdubose@airquality.org) or 916-874-4876.

Sincerely,

A handwritten signature in cursive script that reads "Paul Philley".

Paul Philley, AICP  
Program Supervisor, CEQA and Land Use Section  
Sac Metro Air District

## Taylor. Todd

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**From:** Muriel Strand <ecoengr@comcast.net>  
**Sent:** Friday, April 9, 2021 11:40 AM  
**To:** PER. climateactionplan  
**Subject:** comments on sacramento county's proposed CAP  
**Attachments:** sac county CAP comments.docx

EXTERNAL EMAIL: If unknown sender, do not click links/attachments.

Muriel Strand, P.E.

Advertising is a private tax.  
- Andre Schiffrin

Good science and financial profit are mutually exclusive.  
- me

April 8, 2021

To: Sacramento County  
From: Muriel Strand, P.E.  
Re: Proposed Sacramento County Climate Action Plan

The County's plan falls short of what will be needed for future ecological and social sustainability. In my engineering opinion, radical change will be necessary to achieve such sustainability.

Information such as described in these three websites is indicative of these predictions:

Governments have identified commodities essential to economic and military security  
Obtaining them is another matter

<https://www.economist.com/finance-and-economics/2021/03/31/governments-have-identified-commodities-essential-to-economic-and-military-security>

Consumer boycotts warn of trouble ahead for Western firms in China

"Nearly half of the polysilicon in solar panels globally comes from Xinjiang. China's largest wind-turbine maker, Goldwind, is based there. Xinjiang's oil and gas power factories around China."

<https://www.economist.com/business/2021/03/31/consumer-boycotts-warn-of-trouble-ahead-for-western-firms-in-china>

Peak mining & implications for natural resource management

<https://www.youtube.com/watch?v=TFyTSiCXWEE>

In effect, we cannot graft our fossil fuel lifestyles onto PVs and windmills. We must go back to the drawing board and redesign our technology from the ground up.

Please find more in-depth discussion of what may be needed in the following papers:

[https://www.researchgate.net/publication/256048802\\_Sustainable\\_Investment\\_Means\\_Energy\\_Independence\\_From\\_Fossil\\_Fuels](https://www.researchgate.net/publication/256048802_Sustainable_Investment_Means_Energy_Independence_From_Fossil_Fuels)

and

[https://www.researchgate.net/publication/333581837\\_Is\\_it\\_true\\_that\\_'Small\\_Is\\_Beautiful'](https://www.researchgate.net/publication/333581837_Is_it_true_that_'Small_Is_Beautiful')

Another excellent discussion of the kind of changes that are needed can be found in Charles Eisenstein's recent book, "Climate – A New Story." On the foundation of a deep and wide-ranging bibliography, mostly recent and apparently peer-reviewed, his basic thesis is that what we have done to the natural world with our cheap fossil fuel energy is at least as damaging as the global warming caused by GHG emissions.

His recommendation for action has four basic steps, in the following order:

1. Protect what's still intact, like the rainforests in the Amazon and the Congo, where Gaia is still healthy, where ecological memory yet endures and from where it can still spread.
2. Come back into relationship with Gaia and all the plants and animals, and regenerate and heal all the ecological wounds that humans have inflicted.
3. Stop poisoning everything with pesticides, herbicides, trash, plastic, etc.
4. Cut GHG emissions that are adding to Gaia's stress and trauma.

As a taste and summary of the book's contents, I recommend this short video:  
<https://www.youtube.com/watch?v=8IO6Y5baPO0>

Lastly, I offer a few comments on some of the specific Community GHG Reduction Measures:

**Measure GHG-16: Traffic Calming**

Some traffic calming measures will discourage cyclists, such as curb extensions, speed tables, and bulb-outs. Remove them from the plan.

Complete streets plans and construction should NEVER involved installing new pavement, as this reduces the potential for natural biological carbon sequestration, and natural cooling.

While existing structures may slow vehicles, they do not seem to make drivers feel calmer.

**Measure GHG-17: Bicycle Facilities**

**GOV-EC-04**

Too often, bicycle parking structures seem to have been designed, selected and located without consulting actual cyclists. People who don't ride bicycles should not be making any such decisions.

**Measure GHG-20: Safe Routes to School**

Ensure that ALL neighborhood schools remain in use so as to reduce walking and cycling distances for students. Pedestrian walkways should never be adjacent to traffic lanes, and should never be located between parking and roadways.

**Measure GHG-21: Update Community and Corridor Plans**

**GOV-EC-01:**

**GOV-EC-02:**

**GOV-EC-03:**

**GOV-EC-05**

Identify the sustainable jobs and their locations that will be needed and available in the future so as to better understand where transportation demand will be and where it won't be. Focus on **access** to goods and services, **not** mobility.

Affordable housing should be owner-occupied, as rental housing is reliably characterized by rents that increase more than the minimum wage, more than the cost of living, and are regularly upended by gentrification.

**Measure GHS-22 Connection Key Destinations**

Focus on **access** to goods and services, **not** mobility and travel.

**GHG-23 Incentivize Infill Development**

Urban farming should qualify as desirable infill development, as it has great potential to reduce freight and shopping travel. The vast acreage of suburban lawns offers huge potential for conversion to urban farming.

**Measure GHG-24 Increase Organic Waste Diversion**

Calculate waste fees to be proportional to actual waste disposed of.

**Measure GOV-FL-01**

**GOV-AR-01**

Include bicycles as part of the County's fleet. Identify all possible work-related bicycle uses and trips.

**Measure GOV-BE-01:**

**GOV-BE-02:**

**2.4 Measure: Electrification of Municipal Buildings**

Require passive solar design and construction for all renovation and construction of county buildings, to the extent possible.

**Measure GOV-BE-03**

Require training in passive solar design for all County employees.

**Measure GOV-WA-01:**

**All Measures: WATER**

Charge water users according to actual use in terms of gallons, and charge higher rates for higher volumes.

**GOV-WA-02**

Invent a sprinkler head design that will turn itself off when it malfunctions. Identify and install alternative drought-tolerant replacements for turf.

**Measure: Electric Agricultural Equipment**

**2.4 Measure: Electric or Alternately-Fueled Construction Equipment**

Provide incentives for replacements of fossil fuel equipment that are manual, human-powered tools.

**2.5 Carbon Neutrality**

Emissions estimates are insufficient for accurately assessing actual emissions reductions and carbon neutrality. Moreover, precise quantitative assessment of carbon absorption by natural and working lands is almost impossible. Qualitative cultural change is in order.

SMUD's goal of a zero-carbon power supply by 2030 is ambitious and inaccurate. Fossil fuels are required for the mining and refining of the metals and minerals required to manufacture PVs and windmills. As well, this approach cannot scale up nationally, let alone globally.

**Adaptation Measures**

Cultural change is needed. Again, see Charles Eisenstein's excellent book, *Climate – A New Story*, explains why we cannot graft superficial changes such as nonrenewable harvesters (PVs and windmills) of renewable energy onto our fossil fuel lifestyles. Fundamental cultural and technological changes are essential. Thus, we should expect fundamental change in the total set of jobs, as the future set of sustainable jobs will be quite different than the current set of unsustainable ones.

Ensure that insurance company premiums reflect actual rebuilding costs in the wake of fire and flood.

**Measure Water-02**

**Measure Water-03**

Include groundwater recharge

**All Measures: FLOOD**

Identify and implement measures to maximize water infiltration and groundwater recharge during and after rain events.

**Measure Flood-02:**

Modify building codes to permit composting privies with specified management practices, and to maximize greywater installations.

**Measure FLOOD-12**

Never permit new or additional exposure of bare ground without a verified and funded plan for replanting as soon as possible.

## Taylor. Todd

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**From:** Dale Steele <info@email.actionnetwork.org>  
**Sent:** Friday, April 9, 2021 2:33 PM  
**To:** PER. climateactionplan  
**Subject:** Draft County Climate Action Plan Inadequate

**EXTERNAL EMAIL:** If unknown sender, **do not** click links/attachments.

Public Comment,

I am writing to provide comments on the draft Sacramento County CAP. I am extremely disappointed with the draft which falls far short of the needs to address the climate emergency that the County declared recently.

As a long time resident of Sacramento County I am very concerned about the increasing health threats and worsening air quality that are linked to the climate emergency we are experiencing. I have family living in Sacramento County including my children and grandchildren and know that we must do better so that they don't bear the brunt of these increasing impacts. I expect the County to take an aggressive lead role in addressing climate change mitigation and adaptation measures. The draft CAP falls very far short as written. It's not too late to improve the final report and address these important responsibilities.

Specific comments follow:

The draft CAP not reflect the County's Climate Emergency Declaration (CED). There is weak language but no real action based on the specified 2030 carbon-neutral goal. The draft would defer the CED provisions until a proposed 2024-25 CAP update. That is totally unacceptable. The CAP just passes the responsibility into the future, where implementing measures to avoid runaway climate change will be even more difficult.

Carbon offsets are not a long term solution and should be used only as a last-ditch effort when other actions have failed. Offsets need to provide real local values too. Offsets should not be part of the initial set of actions to address the climate crisis. If offsets are used, they must be kept local to both reduce GHG emissions and provide benefits to disadvantaged communities.

Most of the CAP measures would be impossible to enforce and monitor because they are described in aspirational terms, defer mitigation, don't identify costs and funding, propose partnership or collaboration with uncertain effect, do not identify or commit to a schedule of performance, and state final 2030 goals without interim milestones.

The CAP does not offer actions to prioritize infill over sprawl development. Sprawl is the major driver of passenger vehicle miles travelled, the County's biggest source of greenhouse gases. The draft CAP does not provide robust public involvement in the CAP's development. Addressing climate change will take the whole community working together.

The draft CAP does not provide an adequate Implementation Plan. Implementation is critical and must be focused on real actions that can be measured.

The draft CAP assumes SMUD will meet its ambition but necessary 2030 carbon-zero goal, and that would reduce the need for County action. That's not the case and can't be counted on. The County must plan for taking real action. We have only a small window of time to avoid runaway climate change. SMUD is leading with their planned actions but no matter what SMUD achieves, the County must do as much to address this threat.

In summary, the draft CAP falls far short and is an embarrassing and inadequate effort to address a very real climate emergency. Please take a real lead role with the final CAP. The public is watching and will demand aggressive effort by the County. We are in a climate emergency!

Dale Steele  
dtsteele@mac.com  
301 27th Street  
Sacramento, California 95816

## Taylor. Todd

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**From:** Meghan Cook <info@email.actionnetwork.org>  
**Sent:** Friday, April 9, 2021 3:47 PM  
**To:** PER. climateactionplan  
**Subject:** Re: Sacramento County Climate Action Plan (CAP)

**EXTERNAL EMAIL:** If unknown sender, **do not** click links/attachments.

Public Comment,

As a resident of District 1, I am writing to express my concern with the County's draft climate action plan (CAP). As drafted, the plan is weak in a number of ways and does not address some of the biggest actions the County could take to tackle climate emissions.

Last summer, I watched the skies turn orange and ash rain down on my car for weeks, as record-breaking fires tore across California. I stayed trapped inside, but many of my friends and neighbors were forced outside for work, coughing from the smoke. I shudder to think of the health consequences in the County for years to come. This is not normal. It was caused by climate change, and it is getting worse every year.

But, we have a chance to do our part to stop this nightmare and save lives in our county and globally. We need a strong County CAP now. The CAP should include a clear plan for reaching the goals adopted in the Climate Emergency Declaration. The CAP should prioritize infill development, as zoning and planning are one of the strongest tools the County has to address emissions. Goals should be specific and enforceable, with a clear implementation plan. Lastly, public involvement, particularly of our most vulnerable communities, should be a cornerstone through every step of CAP implementation. These measures would make our CAP far stronger and more impactful.

We can tackle climate change and build a safer, more prosperous economy for all County residents, but we must invest now. Sacramento County residents have been waiting on a meaningful CAP for almost a decade. We have no more time to waste. I am asking you to please take this issue as seriously as if your lives depended on it. Because mine does, your children's and grandchildren's do. Thank you for your time and consideration.

Sincerely,  
Meghan Cook  
Sacramento County Resident  
District 1

Meghan Cook  
meghan.o.cook@gmail.com  
3644 H St., Apt. 2  
Sacramento, California 95816

## Taylor. Todd

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**From:** Laurie Heller <info@email.actionnetwork.org>  
**Sent:** Friday, April 9, 2021 3:50 PM  
**To:** PER. climateactionplan  
**Subject:** What will your grandchildren say about your actions today?

**EXTERNAL EMAIL:** If unknown sender, **do not** click links/attachments.

Public Comment,

Dear Supervisor:

You chose to run for office. You put your hand up and said "I will be a leader." Whatever benefit you assumed for taking on this role came with equal or greater responsibility. We ARE in a crisis. We ARE in an emergency. But the people who will feel the brunt of your action – or inaction – will be in your grandchildren's generation. What you don't do today they will suffer for tomorrow.

You are in the last generation of leaders to have the choice to continue 'business as usual'. I hope you understand what your grandchildren's world will look like if leaders like you choose the path of least resistance (i.e., accept the Climate Action Plan as proposed.)

If you don't, it's time to get educated.

Laurie Heller  
laurierivlinheller@gmail.com  
1401 Perkins Way  
Sacramento, California 95818

## Taylor. Todd

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**From:** Nicholas Avdis <NAvdis@thomaslaw.com>  
**Sent:** Friday, April 9, 2021 4:36 PM  
**To:** PER. climateactionplan  
**Cc:** Robert P Thomas  
**Subject:** Comments to Draft CAP

**EXTERNAL EMAIL:** If unknown sender, **do not** click links/attachments.

On behalf of Upper Westside, LLC and the Upper Westside Specific Plan (UWS), I provide the following comments to the County's Draft Climate Action Plan:

Overall general comment 1: The current draft of the CAP does not provide sufficient detail regarding the implementation measures identified so that overall feasibility and costs of compliance can be determined.

Overall general comment 2: More detail should also be provided in terms of establishing the legal nexus for imposition of any particular measure.

Measure GHG-14: Improved Transit Access – Promotion of regional mobility choices, including support of the RT network, will be important for improving the region's air quality into the future. Mobility, including in the way the project is designed, is one of the key design principles of the UWS project. Important to our project's overall mobility strategy is in addition to utilizing the services of RT, positioning the to take advantage of the successes of and proximity to Jibe, the existing Transportation Management Association (TMA) in Natomas. This measure should be modified to appropriately take into account the important roles that Transportation Management Associations (TMAs), like Jibe in N. Natomas, play in filling the gaps in public transit networks in our region.

Measure GHG-24: Incentivizing Infill Development - This measure proposes imposition of a \$1,000 per dwelling unit equivalent (DUE) fee for all development in County master plan areas, approved and proposed, including UWS. The CAP identifies the need to facilitate and incentivize high quality infill development so as to likely reduce VMT and improve air quality (AQ) and greenhouse gas emissions (GHG) in the County. The UWS project, which is a proposed Master Plan development, takes advantage of its geographic location and proximity to existing development and mobility infrastructure, like bicycle, pedestrian and transit networks by designing a community that will be less auto-dependent, more walkable and bikeable, and thus having a regional benefit from a vehicle miles traveled (VMT) perspective. Specifically, the traffic analysis for UWS indicates that its project VMT is lower than 15% of the average of existing development in the County and as such does not exceed the County's VMT threshold of significance for CEQA. It is my understanding that it is the only master plan proposed in the County that exceeds the County's VMT goals. The proposed measure, therefore, ignores the regional VMT, and AQ and GHG, benefits that a project like UWS would provide. This measure should be modified to provide a definition for infill. That definition should include projects for which VMT is 15% below the regional average consistent with applicable local and state guidelines. Furthermore, the measure should provide that projects located within such infill areas should not be subject to the infill in-lieu fee and, in facts, such project should be able to access these funds to promote development in these areas.

Measure WATER-2: Increase On Site Gray Water and Rainwater Resuse, and Recycled Water Systems- This measure is an example of benefit analysis should be provided so that its AQ/GHG benefits are better understood. It calls out specific measures for implementation, including requiring new construction to include holding tanks, pumps and redundant plumbing in buildings which would add considerable costs to new construction. As to rainwater reuse, it should be noted that our regional climate is generally comprised of wet winters and dry summers – the time when water is needed most and when it is not raining, thus calling into question the efficacy of rainwater reuse.

Measure FLOOD -05: Invest in Use of Pervious Pavements and Landscaping in Developed Area and Restrict the Use of Paved Surfaces. This measure should be modified to accommodate project specific instances where high ground water or clay soils exist thus limiting the benefits from the use of such surfaces. High ground water and clay soils limit the infiltration benefits of a pervious surface in these areas.

Thank you for the opportunity to provide the above comments. We look forward to working with the County on adequately addressing these concerns with the current draft document.

Nicholas S. Avdis  
Of Counsel

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**Taylor. Todd**

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**From:** Oscar Balaguer <oscarbal@hotmail.com>  
**Sent:** Friday, April 9, 2021 4:44 PM  
**To:** PER. climateactionplan  
**Subject:** SAC CO CAP PUBLIC DRAFT: 350 CMMT  
**Attachments:** 2021-04-09, SacCoCAP PubDft-Comment.docx

**EXTERNAL EMAIL:** If unknown sender, **do not** click links/attachments.

Dear Todd et al,

Please see subject attached comments, submitted on behalf of 350 Sacramento.  
Please respond to confirm receipt.

Thank you very much,  
O



April 9, 2021

Todd Smith, Senior Planner  
Sacramento County Planning and Environmental Review  
700 H Street, Sacramento, CA 95814

Via Email

## **SAC COUNTY CAP, PUBLIC DRAFT: COMMENTS**

Dear Todd,

We appreciate the opportunity to comment on the subject draft CAP. There are improvements over the previous version, but we are disheartened by its continued lack of urgency and uncertain measures, as pointed out in our earlier comments.<sup>1</sup> The need for rapidly de-carbonizing our economy, well documented in County documents and elsewhere, is not reflected in the CAP.

A more ambitious CAP would speak to the pressing planning needs of our time, and would position the County to successfully compete for federal climate action funding now being negotiated in Congress.

Our comments address the Community CAP and touch briefly on the Government Operations plan.

### **SECTION ONE: COMMUNITY CAP COMMENTS**

Our comments, developed in consultation with ECOS, Sierra Club, and Citizen's Climate Lobby, are presented under three broad headings, each of which ends with a "What's Needed" listing:

- I. County Climate Emergency Declaration
- II. Land Use/VMT
- III. Accountability

#### **I. THE CAP DOES NOT REFLECT THE COUNTY'S CLIMATE EMERGENCY DECLARATION**

There is fig-leaf verbiage but no substantive response to the Climate Emergency Declaration (CED)'s policy directions re:

- a 2030 carbon-neutral goal;
- urgent short-term measures;
- expert consultation;
- funding analysis;
- task force to oversee plan; and
- "unprecedented" public involvement.

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<sup>1</sup> 350 Sac, ECOS, Sierra Club, July 16, 2020; 350 Sac, September 24, 2020; 350 Sac, November 19, 2020.

The draft would defer the CED provisions until a proposed 2024-25 CAP update, far too late to meet the CED's overall intent and specific aims. Attachment 1 provides further analysis.

### **What's Needed:**

The CAP should present a serious effort to address both the CED's challenging 2030 goal and specific direction. Each item of the CED should be addressed in this CAP, and steps identified to achieve it. Constraints should be identified, alternatives analyzed, and a pathway proposed. SMUD staff is addressing a similarly challenging goal in a professional and responsible manner, while the CAP merely 'kicks the can down the road'.

## **II. THE CAP DOES NOT ADEQUATELY PRESENT LAND USE-RELATED MEASURES**

### **A. Planning Background**

1. **The County's Current Growth Plans will Increase GHG Emissions.** The County's *de facto* growth strategy is outlying ("sprawl") development. Such development will increase passenger car traffic, which is the County's single greatest GHG source. Also, the County's approved and planned sprawl far exceeds projected market demand for housing. Most of that greenfield development would occur beyond the County's Urban Policy Area (UPA)<sup>2</sup>, in expectation of being granted project-specific general plan amendments.<sup>3</sup>

The likely result of the over-abundance of entitled housing starts far from the urban core will be numerous far-flung, partially built-out tracts. Such a land use pattern would:

- be impossible to service with transit;
- cause increased traffic and GHG emissions;
- require more energy to build and operate than compact development;
- create more environmental impact than the same number of infill homes;
- make rational infrastructure planning difficult and construction costly; and
- be more difficult and expensive to provide with County services.

3. **Most County Growth Could be Accommodated by Infill.** The County's projected need for new homes through 2040 is for 37,230 dwelling units<sup>4</sup>; hardly more than the County's current estimated infill capacity of 33,000 units.<sup>5</sup>
4. **Numerous General Plan (GP) Policies Support Infill Development.** E.g., Policies EN-10G, LU-1, LU-3, LU-4, LU-5, LU-6, LU-7, LU-8, LU-11, LU-23, LU-26, LU-60, LU-81, LU-33, LU-34, LU-90, LU-57, LU-68, LU-74, LU-82, LU-108B support infill. County staff has stated there are 27 such policies.<sup>6</sup>
5. **Two Primary General Plan Policies Support Sprawl.** The GP directs that urban growth will be accommodated within the established UPA; but GP Policies LU-119 and LU-120 allow project-specific GP amendments to extend the UPA boundary so as to include

<sup>2</sup> The Urban Policy Area (UPA) defines the area expected to receive urban levels of public infrastructure and services within the planning horizon and provides the geographic basis for rational planning of such services and infrastructure.

<sup>3</sup> Sacramento County, *2030 General Plan Annual Report for Calendar Year 2020*, March 2021.

<sup>4</sup> SACOG, *Sustainable Community Strategy*, 2019.

<sup>5</sup> Sacramento County, *op. cit.*

<sup>6</sup> Sacramento County, *op. cit.*

proposed project areas. The result is that the boundary meant to define the limit of urban growth for the planning period (2030 for the current GP) becomes the baseline from which growth can occur outward, farther from the urban core. That new UPA boundary can then become the baseline for progressive further outward expansions, in “leapfrog” fashion. These two policies set forth measures to limit or mitigate the environmental impacts of such development. However these measures do not avoid the potential for “leapfrog” development, and are limited to the onsite character of the projects. They do not address the inherent, unavoidable impacts of disjunctive development, particularly given the incomplete build-out pattern described above. We are unaware of prior environmental analysis of these impacts.

#### **D. The CAP’s LU-Related Measures are Not-Credible, or are Incomplete**

Measures GHG-21, and GHG-22, (“Update Community and Corridor Plans”, and “Connecting Key Destinations” respectively), propose future planning of uncertain effectiveness.

Measure GHG-23, “Incentivize Infill Development”, proposes a per/home fee on new greenfield development, with proceeds used to incentivize infill. It is credible but incomplete, because it will incentivize infill only to extent that sprawl continues, and because without a policy commitment to change current growth priorities its effectiveness is uncertain.

These three measures are “un-quantified”, indicating their effectiveness cannot be substantiated and/or implementation is uncertain

#### **E. The CAP does Not Discuss Other Relevant Planning and Mandates**

CAP Section 1.4 and Appendix B fail to discuss County and Regional planning efforts directly relevant to climate change planning and GHG-reduction:

1. **County infill planning.** Such planning is not mentioned among the other identified County activities, and includes, e.g.:
  - The County’s current LEAP-funded grant to develop a comprehensive inventory of infill sites, and identify and remove development barriers;
  - Staff’s recent proposal that 27 measures in the GP’s Land Use element should be part of a formal infill program in order to be fully implemented;
  - The pending completion of the *Re-Envision West Arden Arcade* plan;
  - Actions taken to-date on the *Fair Oaks Blvd. Project*;
  - The County’s 2008 adoption of an infill program and principles;
  - Other past planning exercises for the County’s deteriorating road corridors.
2. **County Local Hazard Mitigation Plan.** The LHMP attempts to assess and prepare for natural disasters including flood, drought, wildfire, and severe weather, al of which are exacerbated by climate change. Disaster planning is increasingly necessary, but the most effective, and ultimately the only, way to protect the community is to through aggressive GHG-reduction measures.
3. **Regional MPO/SCS.** SACOG’s mandated *Sustainable Community Strategy (SCS)* is listed, but without any discussion of the CAP’s consistency. The SCS calls upon jurisdictions in the Sacramento region to do their part to lower GHG emissions “*by accelerating infill development, reducing vehicle trips, and electrifying remaining trips.*”

4. ***Other Applicable Mandates.*** Appendix A, "... Regulatory Background" does not include commonly-cited statutory requirements affecting local GHG-reduction programs, including SB 375 (Sustainable Communities), SB 743 (VMT Thresholds), and AB 1826 (Organics Recycling).

**What's Needed:**

1. ***Cumulative impact analysis.*** The environmental document for the CAP should include a cumulative impact analysis of project-specific extensions of the UPA for currently planned projects, considering impacts to VMT, GHG emissions, and other potential environmental effects, insofar as such analysis has not been previously provided.
2. ***Analysis of partial build-out impacts.*** The environmental document for the CAP should consider impacts associated with partial project build-out resulting from approval of development beyond market demand, as described above.
3. ***Balanced Growth Policy.*** The CAP should include a balanced growth policy measure to ensure that greenfield development does not continue to outpace infill by requiring that successive infill development goals be met before a succeeding increment of greenfield development is approved.
4. ***Early Completion of LEAP-funded work.*** The CAP should commit to expediting this work to promptly resolve the County's uncertainty about infill capacity, constraints, and needed support.
5. ***Discussion of CAP/SCS consistency.*** The CAP or its environmental document should evaluate the CAP's consistency with the SCS.
6. ***Regulatory Background.*** The CAP should list and summarize all mandates directly relevant to climate action planning.

**III. ACCOUNTABILITY**

**A The CAP Provides No Evidence to Support GHG-Reductions Assumed Under the Adjusted BAU Scenario.**

CAP Table 1, and related tables in Appendix E, project 2030 emissions based on assumptions of GHG-reductions achieved by seven non-County agencies which are identified in CAP Table 2. However no evidence or explanation is provided for how the reductions from each agency were calculated, and with one exception (SMUD) the reductions attribute to each agency are unstated .

**B. The CAP does not present substantiated, complete, specific, and enforceable mitigation measures.**

The CAP provides no evidence or explanation for the GHG-reductions claimed for its quantified measures.<sup>7</sup> In additions, many if not most CAP measures would be impossible to enforce and monitor because they:

<sup>7</sup> During the review period for the CAP, County staff provided us with an untitled, undated, un-attributed consultant product as a PDF file ("*Quantified Community GHG Reduction Modeling Assumptions.pdf*").

- are described ambiguously or in aspirational terms;
- are voluntary
- defer formulation of mitigation;
- do not identify costs and funding;
- proposes partnership or collaboration with uncertain effect
- do not identify or commit to a schedule of performance, and state only final 2030 goals without interim action dates or milestone target;
- do not include, “*economic analysis and detailed programs and performance measures*” as promised in the GP’s 2011 DEIR and GP Policy LU-115, Implementation Measure H.

**Examples.** Our present comments focus on the CAP’s broader needs rather than on measure-specific critiques. However, for illustrative purposes we offer the following reviews of two problematic measures, chosen among many:

1. ***Measure GHG-01: Carbon Farming.*** This quantified measure is credited with sequestering 77,692 MT CO<sub>2</sub>e per year by 2030, which is by far the most substantial reduction of any of the CAP’s measures, and is described as, “... *essential for putting the County on a path to achieving the objectives of the community 2030 carbon neutrality goal*” (CAP, Sect 1.3). However, the measure lacks credibility because:
  - It would be entirely voluntary;
  - It would rely on an outreach/educational program, the specifics of which are entirely lacking;
  - Neither cost or funding source for the outreach program are identified;
  - It assumes without evidence or explanation high rates of program acceptance (30-70%) by County farmers and ranchers – a group who are likely be slow, with good reason, to adopt new soil management practices not directly yielding enhanced return on investment. The US National Resource Conservation Service has been promoting many of the proposed cultural practices thorough educational outreach and Farm Bill incentives for nearly a century, achieving only partial acceptance.
  - It assumes without evidence or explanation that 60 percent of the County’s total agricultural land will have adopted the identified soil-management practices by 2030.
  - It would develop the program by 2024, leaving only six years to accomplish its goals from a dead start.
  - No interim success measures are identified, making it impossible to determine progress, or lack thereof, until 2030.
2. ***Measure GHG-11: Reduce Emissions from New Residential and Office/ Business Professional Development (sic) Vehicle Miles Traveled.***

As previously noted, the County’s largest single source of GHG is passenger vehicle traffic, comprising about 34 percent of total emissions (1,671,596 MTCO<sub>2</sub>e/year).

This measure does not reduce existing GHG emissions. It would implement the regulatory requirement of SB 743 to reduce growth-induced VMT generated by new development by 15 percent of regional average, and is credited as reducing the increase in GHG caused by growth by 22,037 MT CO<sub>2</sub>e per year by 2030. Insofar as the County has adopted implementing guidelines to be imposed during the CEQA

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We have not had time to comprehensively review this file, but referred to it for our analyses of Measures GHG-01 ad GHG-11.

process, this measure would be credible, although the reductions achieved would be insignificant effect in reducing total County VMT.

However, the measure allows developments which have applied “*feasible on-site VMT mitigation measures*”, but don’t meet the reduction target, to instead buy carbon offsets through a “*VMT mitigation program (e.g., VMT mitigation fee, bank, or exchange)*”. This renders the measure non-credible because:

- “Feasible on-site VMT mitigation measures” are not identified, rendering the practical application of this measure uncertain. The CAP and its environmental document should present specific measures which the County proposes are feasible, rather than defer that determination to a future process out of public view.
- No evidence or explanation is provided to substantiate the presumed GHG reductions.
- As noted above, the great majority of planned County growth is in sprawl development, almost certainly generating VMT well above the regional average. It’s likely that such projects would rely on the proposed “VMT mitigation program”. However, because the specifics of this program are undetermined there is no evidence that it would be feasible or effective.
- The use of any carbon-offset funds is of local concern but is left unclear in the CAP, which discusses carbon offsets in disparate ways: Measure GHG-11 does not limit where such in-lieu mitigation could occur; Measure GHG-15 implies that offsets may be for used for local projects; but CAP Sect. 2.3 specifies that offsets will be “outside of the County’s control”.

## **B. The CAP Assumes Without Evidence that SMUD will meet its 2030 Carbon-Zero Goal**

The CAP assumes SMUD will meet its aspirational 2030 carbon-zero goal, providing 32 percent of the CAP’s total claimed GHG reductions. This substantially reduces the need for County action, but is problematic because:

- Claimed GHG reductions based on other entities’ programs should be assured. A CAP’s “adjusted business as usual” scenario normally includes only approved legislative actions, which the SMUD goal is not (SMUD’s goal is the only non-mandated program among the seven listed in CAP Table 2).
- SMUD own staff has:
  - stated that there is no clear pathway to reaching the 2030 goal;
  - identified numerous risks and unknowns which will have to be successfully resolved to reach that goal;
  - made no assertion that meeting the goal is certain or even probable.

CAP section 2.3 acknowledges that clear uncertainty, but only with vague reference to requiring carbon offsets if SMUD does not reach its goal, without stating when such offsets would be required, of whom, by what authority, at what cost, and how used.

## **C. The CAP’s Implementation Plan is Inadequate**

The CAP’s “Implementation and Monitoring Strategy” lacks:

- Identification of needed resources to implement CAP measures;
- Identification of proposed funding for CAP measures;

- Reference to the County's GP commitments to; "...develop sustainable funding sources for this Program ..., which may include a fee assessed for development projects" (GP Policy LU-115).
- Schedule of interim actions and milestones;
- Dates certain for reporting and for CAP and GHG Inventory updates;
- Identification of resources and funding needed to provide ongoing CAP administration, monitoring and reporting.
- A measure consistent with the GPs commitment to, "*Enact and fund a Sustainability Program to provide ongoing oversight, monitoring and maintenance of the Climate Action Plan, including ... updates to the GHG emissions inventory, and future updates to the... Climate Action Plan as necessary. The County shall develop sustainable funding sources for this Program and associated activities, which may include a fee assessed for development projects*" (GP Policy LU-115, Implementation Measure I).

In addition, this section states implementation "*will entail ... tracking the payment of relevant assessments on new development to ensure that these funds are being invested into high-density infill projects ...*" However as noted in our comments on Measure GHG-23, the assessment of any such fee is uncertain.

#### **What's Needed:**

1. **Credible Measures.** The CAP should provide clear, fully developed mitigation measures which include schedules of key implementing actions and interim targets, present evidence for claimed effectiveness, and are consistent with GP commitments.
2. **GHG-11, Offsets.** The CAP should provide justification for allowing offsets instead of requiring direct GHG-reductions; detailed clarification of proposed offset funding and the implementation process; discussion of potential local use of offset funds to reduce County GHG emissions and provide co-benefits, especially directed to County environmental justice communities.
3. **SMUD Goal.** The CAP should provide substantial evidence demonstrating that assumed SMUD reductions meet CEQA requirements for mitigation certainty.
4. **Implementation Plan.** The CAP should include the provisions which are identified above as lacking.

## **SECTION TWO: COUNTY OPERATIONS PLAN COMMENTS**

- A. **Accountability.** The CAP presents 18 in-house measures with no mention of the County *Government Operations CAP* adopted in 2012. Whether the proposed measures are carried over from the adopted plan, are updated, or are new is unstated. Likewise unstated is the status of implementation of the existing plan's measures, or an assessment of their effectiveness over the last nine years. With no attempt at such accountability, the success of both the current program and the proposed measures is uncertain. As with the Community CAP, no evidence or explanation is provided for the GHG reductions attributed to the operational measures.
- B. **Green Procurement.** The State of California encourages and supports local green procurement purchasing to reduce GHG emissions and other environmental impacts<sup>8</sup>. No such measure is included in the Operations CAP.

<sup>8</sup> CARB, CoolCalifornia Portal, "Green Purchasing"; <https://coolcalifornia.arb.ca.gov/article/buy-green-0>

**What's Needed:**

1. **Operations CAP Audit.** The CAP should include an audit of the County's Government Operations CAP, such as the one conducted by the City of Sacramento on its City operations CAP which found:<sup>9</sup>
  - Improved monitoring and reporting is essential;
  - Centralized management and oversight should be considered;
  - Awareness and compliance need to be strengthened.Since the County's Operations CAP also lacks monitoring, reporting, and central management, its implementation likely suffers identical problems. To proceed after nine years of unreported experience without a program assessment would be irresponsible.
2. **Green Procurement Purchasing.** A measure should be added to the Operations CAP providing for adoption and implementation of an Environmentally Preferable Purchasing Policy or similar.

The County has correctly identified climate change as an emergency because it presents a stark and imminent threat. The current draft's business-as-usual response is incompatible with that reality. We look forward to continued work with the County to deliver a CAP that authentically engages the challenge forced on us by climate change.

Sincerely,



Justin Tweet, Co-Chair  
350 Sacramento CAP Team



Oscar Balaguer, Co-Chair  
350 Sacramento CAP Team

Cc: County Supervisors via Clerk of the Board  
Ann Edwards, Interim County Executive  
Leighann Moffitt, Planning Director

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<sup>9</sup> City of Sacramento Performance Audit Division, *Audit of the City's Green Efforts*, December 2020. Online: <https://www.cityofsacramento.org/-/media/Corporate/Files/Auditor/Audit-Reports/Audit-of-the-Citys-Green-Efforts.pdf?la=en>

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## SACRAMENTO COUNTY'S DRAFT CAP DOES NOT REFLECT THE COUNTY'S CLIMATE EMERGENCY DECLARATION

Sacramento County adopted a *Climate Emergency Declaration* (CED) on December 16, 2021, citing the, “*risk of experiencing the devastating effects of extreme heat and weather events caused by rising atmospheric greenhouse gasses*”, and the associated, “*increased demand on public sector resources and emergency response capacity*”.

The CED set an ambitious goal, commensurate with scientific opinion, of achieving community-wide carbon-neutrality by 2030, and also provides specific policy direction to meet the goal.

The County released a public draft of its *Climate Action Plan* (CAP) on March 8, 2021. The CAP fails to substantively respond to the CED's guidance, as detailed below:

### 1. URGENCY

**The CED states:** “*Supervisors ... declare [a] climate change emergency requiring urgent and immediate mobilization of public and private resources to develop and implement a climate and sustainability plan that ...achieve[s] ... countywide carbon neutrality ... by 2030....*”

**However, the CAP:**

- does not identify any measures for “urgent and immediate” early action;
- presents GHG-reduction measures of unsubstantiated and doubtful effectiveness;
- and would defer planning to achieve the 2030 goal until 2024-25.

### 2. SHORT-TERM MEASURES

**The CED states:** “*the County of Sacramento commits to ... significant steps to ... accelerate short term communitywide carbon elimination, and ... eliminate emissions by 2030 ... through regional collaboration....*”

**However, the CAP:**

- does not identify any short-term measures;
- would defer planning to achieve the 2030 goal until 2024-25;
- presents no proposals re regional collaboration.

### 3. 2030 GOAL

**The CED states:** “*the Communitywide Climate Action Plan shall explain the County's approach to ... achieve carbon neutrality by 2030, building on recommendations and analysis from community partners, ... climate experts, ... planners, community members, and economists ... guided by science, data, best practices, and equity concerns.*”

**However, the CAP:**

- Would defer planning to achieve the 2030 goal until 2024-25;

- does not incorporate on-the-record recommendations from environmental community organizations;
- Was drafted without input from the identified professionals, and does not identify a process for future consultation;
- Is inconsistent with scientific consensus re the need for urgent climate action;
- Does not address equity concerns.

#### 4. RESOURCE ANALYSIS

**The CED states:** “County staff shall evaluate the resources necessary to achieve carbon neutrality ..., and the emergency actions required ... by 2030. ... County staff shall identify [funding or resources] gaps and provide recommendations to the County Executive and Board of Supervisors.

**However, the CAP:**

- Does not discuss resources or funding for any CAP measures, or identify gaps
- Provides no funding-related recommendations.

#### 5. EXPERT TASK FORCE

**The CED states:** “*the County ... will establish, within 60 days, a permanent Climate Emergency Mobilization Task Force ... of climate experts ... to oversee the ... climate emergency response plan ... all departments within the County ... shall ... provide regular updates to the Task Force and ... Supervisors concerning departmental progress....*”

**However, the CAP:**

- Makes not mention of the Task Force, or plans to convene it.

#### 6. FARMER SUPPORT

**The CED states:** “*it is vital that farmers ... be supported ... in necessary conservation and regenerative practices that will reduce emissions and improve resilience....*”

**However, the CAP:**

- Presents one measure relating to agricultural support, which is neither credible or substantiated, as specified in 350 Sac’s comments on the CAP.

#### 7. COMMUNITY OUTREACH.

**The CED states:** “*... the County ... commits to support outreach ... for County residents and staff on the urgent need to reduce GHG emissions, and the policies and strategies necessary .... the County ... shall [engage] ... community-based and grassroots organizations ... inclusive economic development partners, ... low-income and disadvantaged communities, youth, communities of color, and environmental justice.*”<sup>1</sup>

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<sup>1</sup> This policy direction is further informed by the CED’s fourth Whereas: “*... the scope and scale of action necessary to stabilize the climate will require unprecedented levels of public awareness, engagement, and deliberation to develop and implement effective, just, and equitable policies to address the climate crisis*”.

**However, the CAP:**

- Has no measures relating to future outreach.
- CAP development itself has proceeded with inadequate public participation.<sup>2</sup>

**8. AGENCY AND ORGANIZATION SUPPORT**

**The CED states:** *“The County shall ... support ... local climate mitigation and adaptation efforts, ... including ... SMUD, the ... AQMD, ... SACOG, ... other regional agencies and associations [and] ... environmental and social justice ... organizations.”*

**The CAP:**

- Includes several measures of varying credibility involving “working with” SMUD and SMAQMD to support their programs (GHG-06, GHG-09, GHG-25).

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<sup>2</sup> The current CAP process offers substantially less opportunity for public involvement than other current plans, e.g., the *West Arden Arcade Re-envisioning Plan*; the *Active Transportation Plan Update*; and the *Natural Resource Management Plan for the American River Parkway*; and far less than the City of Sacramento is offering for its CAP.

The County made a good start in 2016 and early 2017 with four public CAP workshops, and subsequently staff has met with stakeholders. However, since early 2017 there has been only one County-convened opportunity for the general public to question staff about the CAP, with a three-minute time limit placed on public input due to large number of participants.

Due to unprecedented and well-publicized fires, hurricanes, floods, and other disasters and extreme weather since 2017, public concern about climate change has grown.

## Taylor. Todd

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**From:** Faye Wilson Kennedy <fayek@springmail.com>  
**Sent:** Friday, April 9, 2021 4:49 PM  
**To:** PER. climateactionplan  
**Cc:** Serna. Phil; Kennedy. Supervisor; Chris Brown  
**Subject:** Comments on Sacramento County's (Public Draft) Climate Action Plan from the Sacramento Poor People's Campaign (Sac PPC)

**Importance:** High

**The Sacramento Poor People's Campaign (Sac PPC)** would like to offer the following comments regarding Sacramento County's (Public Draft) Climate Action Plan dated March 2021.

**The Sacramento County's Climate Action Plan** must address and use Environmental Justice (EJ) concepts and language such as: **ENVIRONMENTAL JUSTICE**. There is no definition of environmental justice in the draft document. Environmental Justice (or EJ) is defined by the California Environmental Justice Alliance as:

*"The basic right of people to live, work, go to school, and pray in a healthy and clean environment—regardless of race, gender, sexual orientation, age, culture, ability, nationality, or income."*

The Sacramento County's Climate Action Plan only refers to environmental justice twice throughout the document, and just refers the reader to the County General Plan. The County's General plan focuses on several distinct communities as environmental justice communities.

The impacts of climate change: heat, excessively strong storms, and smoke during wildfire season affect all disadvantaged people regardless of where a district boundary is drawn. This is especially true of the homeless who live throughout the entire community regardless of the designation in the County General plan.

Similarly, there's a dearth of reference to the homeless. And there's no reference at all to the impacts of poverty and living in substandard housing and older housing on the communities, and the impact of heat and other weather events like bad air on those who are disadvantaged. The sole focus on flood events as climate emergencies is also misguided as a number of homeless have died in the past year from heat waves and excessive cold and exposure to high winds and falling tree limbs.

Here are 4 specific changes that we call on you to incorporate in the revised CAP:

1. **The issue of Poverty must be addressed.** Social determinants of health (SDOH). Poverty is the single largest determinant of a person's health, and ill health is an obstacle to social and economic development. Additionally, poor people live shorter lives and have poorer health than affluent people. This disparity has drawn attention to the role of health to the social environment.
2. Older homes: community members living in older homes without access to air conditioners or cooling systems must cope with the oppressive heat in Sacramento County and throughout the region.
3. Providing shelters for the unhoused must be considered and addressed due to climate factors such as extreme weather conditions: heat, flood, rain and cold in Sacramento County.

4. Air Quality: community members living in neighborhoods impacted by poor air quality due to climate change are at risk to health issues such as asthma and other upper respiratory disorders; and limited access to outdoor activities.

Sacramento County's Climate Action Plan will not be adequate for the challenges in front of us, which already affects the health of Sacramento County residents, until it correctly and adequately addresses the impacts on the disadvantaged, the poor, people who have historically suffered from injustice in our community in the housing stock and neighborhoods regardless of whether or not they live in one of the designated environmental justice neighborhoods.

Thank you for the opportunity to provide input to Sacramento County's Climate Action Plan.

Sacramento Poor People's Campaign (Sac PPC)

Faye Wilson Kennedy, Lead Organizer

916 812-7429

## Taylor. Todd

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**Subject:** Public Comment on CAP

**From:** weslum@aol.com <weslum@aol.com>

**Sent:** Friday, April 9, 2021 4:52 PM

**To:** PER. climateactionplan <climateactionplan@saccounty.net>; Rich Desmond <RichDesmond@saccounty.net>

**Cc:** weslum@aol.com

**Subject:** Public Comment on CAP

**EXTERNAL EMAIL:** If unknown sender, **do not** click links/attachments.

To Sacramento County Staff and Supervisors,

I appreciate the opportunity to comment on the Climate Action Plan, dated March 2021. I am a 41 year resident of the County and raised a family here. My 41 year career has been in transportation planning, design, environment, operations and research. I've worked for the private sector and in various levels of government including city, county, state and federal. For 31 years I commuted daily to Caltrans offices by bicycle.

I have read the CAP and congratulate staff on a comprehensive effort in this Plan. It addresses most every aspect of the County's area of influence and responsibility towards a future livable community. I am also appreciative of the adaptation measures included in the CAP; these are the everyday issues in our lives.

I believe the Climate Crisis to be real and am reminded of it in the last decades as I experience the more frequent heat waves, more frequent droughts, and recently the wildfire smoke. As I actively study climate in my retired life I believe life on earth is and will be drastically affected. To that end, I highly recommend the County create a organization and increase staff so they can understand the changing nature of this issue; keep up to date with laws and regulations; incorporate changes from industries addressing climate; coordinate with partners and stakeholders; and be a leader in governments and communities to save our quality of life.

I also recommend the staff be aware of the Zero Carbon Action Plan released in the fall of 2020. Developed by over 90 researchers throughout the country it provides a overarching view of the policies and actions needed to meet the Carbon Zero target by 2050. See [https://www.unsdsn.org/Zero-Carbon-Action-Plan?utm\\_source=BenchmarkEmail&utm\\_campaign=ICYMI%3a National Zero Carbon Transportation Plan&utm\\_medium=email](https://www.unsdsn.org/Zero-Carbon-Action-Plan?utm_source=BenchmarkEmail&utm_campaign=ICYMI%3a%20National%20Zero%20Carbon%20Transportation%20Plan&utm_medium=email).

Lastly, I offer a few comments of detail to the CAP:

1. Regarding buildings — existing and new, residential and non-residential, can policies and programs provide incentives for owners to incorporate greener features and that can be rewarded (property tax or permit fees)?
2. Are there enforcement programs being considered to the policies and programs?
3. What policies for inorganic waste are being considered?
4. Can county facilities for employees include showers and lockers for bikers and others?

5. Will life cycle analysis reflect the priority needed to fairly represent societal cost that are typically not included in traditional cost/benefit calculations?
6. Regarding evacuation plans for emergencies can the County include regular dry runs involving stakeholder agencies, media, and the public?
7. Can the County consider additional public input in the form of advisory committees for subject areas? I'd be willing to volunteer.

Sincerely,

Wesley Lum  
916-243-9824  
[weslum@aol.com](mailto:weslum@aol.com)  
1437 El Nido Way  
Sacramento, CA 95864

## Taylor. Todd

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**From:** Jennifer <doncald@hotmail.com>  
**Sent:** Friday, April 9, 2021 5:43 PM  
**To:** PER. climateactionplan  
**Cc:** Slothower. Laurie; Nava. Lisa; Supervisor Serna; John Ching Sac AQMD; Sac AQMD; AQMD Kennard; Jeff S. Harris  
**Subject:** CAP comment on fossil fuel emitting and particulate matter generating devices

**EXTERNAL EMAIL:** If unknown sender, **do not** click links/attachments.

To whomever is to construct & implement our County's — critical to both wildlife and people's public health & safety — climate action plan (CAP). My comment/request is regarding fossil fuel emitting and particulate matter generating devices.

Somewhere (perhaps here: GHG-09 on page 12, addressing gas-powered landscaping equipment is a weak and vague statement: "*The County will work with SMAQMD to establish an incentive program to trade in fossil fuel-powered landscaping equipment with electric versions.*" - This draft statement is far too weak!) in this plan should be a clearly stated deadline ending the use of gas powered lawn devices including leaf blowers, mowers & limitations as to when (*similar to the "no burn days" concept*) any type of blowing device can be used. The latter, considering particulate matter and the Sacramento Valley's chronic air inversion issues. My back patio accumulates a layer of filth on at least a weekly basis.

As you're likely aware, we frequently have very unhealthy air. Thus the use of these devices needs to end sooner than later = within the next few years, please. No vague statements on it, please set some very clear dates, terms and conditions.

Please work to end this air quality issue that has been known & documented by the state since the Year 2000, per: <https://ww2.arb.ca.gov/sites/default/files/classic/research/apr/reports/l828.pdf>

# **GAS LEAF BLOWERS**

...will become  
the leading source of  
ozone-forming emissions in  
the state by 2020,  
ahead of cars.

*California Air Resources Board*



Thank you for your consideration.  
J. Caldwell  
doncald@hotmail.com  
Sacramento, 95833

## Taylor. Todd

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**From:** PER. climateactionplan  
**Subject:** Comments on County Climate Action Plan.

**From:** Maggie Coulter <[mcoulter@dcn.org](mailto:mcoulter@dcn.org)>  
**Sent:** Friday, April 9, 2021 6:38 PM  
**To:** Slothower. Laurie <[SlothowerL@saccounty.net](mailto:SlothowerL@saccounty.net)>  
**Subject:** Comments on County Climate Action Plan.

**EXTERNAL EMAIL:** If unknown sender, **do not** click links/attachments.

Sac County needs to eliminate two stroke engines and gas blowers.  
The CA Air Resources Board has [already documented](#) how bad they are for air quality.  
They also are noise polluting and completely unnecessary.  
They should be banned as soon as possible.  
Please include these comments on the Climate Action Plan.  
Thank you.  
Maggie Coulter  
Sacramento, CA 95817

**Taylor. Todd**

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**From:** Anthony DeRiggi <tderiggi50@yahoo.com>  
**Sent:** Friday, April 9, 2021 8:45 PM  
**To:** PER. climateactionplan  
**Cc:** Supervisor Serna  
**Subject:** comments on draft CAP

**EXTERNAL EMAIL:** If unknown sender, **do not** click links/attachments.

Thank you for the opportunity to comment. My only comment is for: MEASURE GHG-09: ELECTRIC LANDSCAPING EQUIPMENT:

Gasoline-powered landscaping equipment is a significant source of air pollution and GHG emissions. A 2017 report by the CARB estimated that the air pollution emissions from small gas engines such as the ones used in landscaping will soon exceed the amount of emissions from all the cars on the road today in California.

Over 20 cities in California have already banned gas-powered leaf blowers. So, in comparison to what many cities are already doing, GHG-09 appears to be a weak and ineffective voluntary measure.

My suggestion for an effective GHG-09:

**Measure:** The county staff will work with Supervisors and stakeholders to develop an county ordinance to phase out the use of gas-powered leaf blowers by 2025. The County will also work with SMAQMD to establish an incentive program to trade in fossil fuel-powered landscaping equipment with electric versions.

Anthony DeRiggi, MD  
932 46th St  
Sacramento, CA 95819

**Taylor. Todd**

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**From:** Nora Juhasz <ms.norajuhasz@gmail.com>  
**Sent:** Friday, April 9, 2021 10:31 PM  
**To:** PER. climateactionplan  
**Subject:** Climate plan

**EXTERNAL EMAIL:** If unknown sender, **do not** click links/attachments.

Hello,

I have read the plan, but would like it to go further in the area of gas leaf blowers. I would like to see them completely banned, asap, like 21 other cities in California have already done. They are not only polluting with their engines, but they blow off the top soil, with possible pesticides and contaminants, all over the air for us to breath, along with all over our houses and cars, and are very noisy to boot. They are used all year round, when there are no leaves, in place of a broom, and in place of actually sweeping up the dirt and putting it in the green recycling. Just blown off the property and onto others.

Can we please do more then encourage owners to go electric and just flat out ban them?

Thank you,  
Nora Juhasz

## Taylor. Todd

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**From:** PER. climateactionplan  
**Subject:** Gas Leaf Blowers

**From:** Clara Smith <[outlook\\_F51710552DC3ADBB@outlook.com](mailto:outlook_F51710552DC3ADBB@outlook.com)>  
**Sent:** Friday, April 9, 2021 8:20 PM  
**To:** [Slothowerl@saccounty.net](mailto:Slothowerl@saccounty.net)  
**Subject:** Gas Leaf Blowers

**EXTERNAL EMAIL:** If unknown sender, **do not** click links/attachments.

Dear One:

The debris these machines put in our air and settle over our bodies, invade our air passages, beautiful gardens, homes, and cars is unhealthy. Plus the noise is awful! If there is anything at all you can do to stop this invasion of my health and property I would deeply appreciate it!

Thanking you in advance.  
Clara Smith  
2604 N Street  
Sacramento, CA 95816  
(916) 737-6666  
[KUNSCH.clara@sbcglobal.net](mailto:KUNSCH.clara@sbcglobal.net)

Sent from [Mail](#) for Windows 10

## Taylor. Todd

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**Subject:** Please make a Climate Action Plan that reflects the climate emergency declaration, and please include nuclear disarmament as part of the Climate Action Plan

**From:** Bruce Burdick <info@email.actionnetwork.org>

**Sent:** Saturday, April 10, 2021 1:51 PM

**To:** PER. climateactionplan <climateactionplan@sacounty.net>

**Subject:** Please make a Climate Action Plan that reflects the climate emergency declaration, and please include nuclear disarmament as part of the Climate Action Plan

Public Comment,

Dear Supervisor Rich Desmond and all Sacramento County Supervisors,

The world is in a climate emergency with melting glaciers and increasing California wildfires. The Paris Climate Agreement focused on trying to limit global warming to 1.5 degrees C. To limit global warming, we must stop putting greenhouse gases into the air, and each world citizen must emit less than 14.4 pounds of CO2 per person per day. The average Californian emits many greenhouse gases, and the average Californian emits about 82 pounds of CO2 per person per day. How can the average Californian decrease their CO2 emissions from 82 pounds of CO2 per person per day to below 14.4 pounds of CO2 per person per day? The Sacramento County Climate Action Plan should educate Sacramento County Residents about Project Drawdown and recommend Sacramento County Residents watch the you tube video Kiss the Ground. <https://www.youtube.com/watch?v=39akrHEIDBM> The Sacramento County Climate Action Plan should include nuclear winter after nuclear war as a cause of climate change. Alan Robock; Ph.D. in Meteorology, MIT; Professor II, Rutgers University, New Brunswick, NJ; Lead Author, upcoming Intergovernmental Panel on Climate Change Fifth Assessment Report; Editor, Reviews of Geophysics; Fellow, American Geophysical Union, American Meteorological Society, American Association for the Advancement of Science.

<http://people.envsci.rutgers.edu/robock/> has a you tube video <https://www.youtube.com/watch?v=qsREk1oZ-54> describing how a nuclear war (like between India and Pakistan) with just 100 nuclear weapons would be enough to cause 1 degree C of global cooling and threaten the lives of 1 billion people with crop failures from global cooling. The Sacramento County Climate Action Plan should inspire residents to write their representatives, asking them to negotiate taking nuclear weapons off of hair trigger alert, and asking them to negotiate the end of all nuclear weapons. Please give Sacramento County Residents a Climate Action Plan that can help them address the climate challenges of the future, Sincerely, Bruce Burdick, M.D.

Bruce Burdick

[brucenburdick@icloud.com](mailto:brucenburdick@icloud.com)

5104 Keane Drive

Carmichael, California 95608

**Taylor. Todd**

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**From:** Cynthia Shallit <info@email.actionnetwork.org>  
**Sent:** Sunday, April 11, 2021 1:50 PM  
**To:** PER. climateactionplan  
**Subject:** Climate Action Plan

**EXTERNAL EMAIL:** If unknown sender, **do not** click links/attachments.

Public Comment,

Can you strengthen the CAP to put more emphasis on infill housing. This is being done within the City limits of Sacramento, but NOT ANY WHERE ELSE. That is not fair. The rest of the County should have infill housing (and more homeless housing)

The County's general plan supports both infill and outlying ("sprawl") development, but the County's actual growth strategy is overwhelmingly sprawl. Sprawl development is the major driver of passenger VMT -- the County's biggest source of GHG. Moreover, the County has approved housing plans and planning for sprawl far exceeding projected market demand, likely worsening impacts. The CAP does not present initiatives that would directly prioritize infill over sprawl development.

. What's needed: Policy measures actually prioritizing infill before sprawl development.

Cynthia Shallit  
cynthiashallit@gmail.com  
1423 8th Avenue  
Sacramento, California 95818

**Taylor. Todd**

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**Subject:** Feedback on County CAP - SacTree

**From:** Rachel Patten <Rachelp@sactree.com>

**Sent:** Monday, April 12, 2021 10:27 AM

**To:** Smith. Todd <smithtodd@saccounty.net>; PER. climateactionplan <climateactionplan@saccounty.net>

**Subject:** Feedback on County CAP - SacTree

**EXTERNAL EMAIL:** If unknown sender, **do not** click links/attachments.

Hello Todd,

We are excited about the content and direction of the County's Climate Action Plan and enjoyed reviewing the draft document. We had a few comments and questions regarding the urban forestry elements.

- Section 2.1
  - Where are the carbon numbers coming from for urban forestry? This projection seems low to us.
  - Does it account for current trees?
- Measure GHG-02
  - Our program is spelled as NeighborWoods
  - We discussed parking lot conversions and street tree corridors. Is this something that could be called out directly?
- Measure GHG-06
  - Could encouraging residents to utilize the Sacramento Shade program for building cooling through strategic tree planting be added to this section?
- Measure TEMP-02
  - Sacramento Shade rather than Shade Tree program
  - Spelled as NeighborWoods
- Measure TEMP-08
  - Suggest that the rebate program address both PV and parking lot retrofits to plant and irrigate trees (rather than just identify incentives for parking lot trees)
  - Do not recommend allowing PV carports to fulfill all parking lot shade requirements
- Measure FIRE-03
  - <https://www.readyforwildfire.org/prepare-for-wildfire/get-ready/fire-resistant-landscaping/>  
Recommend adding consult with CAL FIRE

We look forward to continuing to partner together.

Thank you,



**Rachel Patten**

NeighborWoods Program Manager

Sacramento Tree Foundation

Mobile: 916-417-7139 | Office: 916-974-4323

Pronouns: she/her

An equitable urban forest ensures that all of our neighborhoods experience the positive health, climate, and community benefits of trees. [Please make a gift to our 2021 Tree Heroes fund-a-need](#) to support our work in under-canopied communities and grow livable and lovable neighborhoods for everyone.

## Taylor. Todd

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**From:** PER. climateactionplan  
**Subject:** County Climate -Action Plan

**From:** Kathleen Green <[kd2010green@gmail.com](mailto:kd2010green@gmail.com)>  
**Sent:** Monday, April 12, 2021 12:32 PM  
**To:** Slothower. Laurie <[SlothowerL@saccounty.net](mailto:SlothowerL@saccounty.net)>  
**Subject:** County Climate -Action Plan

**EXTERNAL EMAIL:** If unknown sender, **do not** click links/attachments.

It may be past the date to submit comments for the Climate-Action Plan but one of the major polluters is landscaping equipment! The exhaust fumes are so bad after they have been in the area it is worse than a car or truck. If studies were done they are far worse. They are NOISE pollutions too. Plus the destruction to top soil.

PLEASE **ADD A DATE** REQUIRING ALL GAS OPERATED MAINTENANCE EQUIPMENT BE CONVERTED TO BATTERY OPERATED

The States Parks Department is working on converting their equipment.

Thank You  
Kathleen Green  
[kd2010green@gmail.com](mailto:kd2010green@gmail.com)  
916-442-1117

## Taylor. Todd

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**From:** Chris Holm <cholm@walksacramento.org>  
**Sent:** Wednesday, April 14, 2021 2:09 PM  
**To:** PER. climateactionplan  
**Subject:** Comments on Draft CAP  
**Attachments:** Sac County Draft CAP WALKSac 20210414 Letter.pdf

**EXTERNAL EMAIL:** If unknown sender, **do not** click links/attachments.

Attached is a short letter on the draft Climate Action Plan. Thank you reviewing these late-arriving comments.

Chris Holm, Project Manager  
[WALKSacramento](#)  
909 12<sup>th</sup> Street, Suite 203  
Sacramento, CA 95814

**We're working remotely, but you can leave voice messages at (916) 446-9255**



4/14/2021

VIA EMAIL

Todd Smith  
Sacramento County Planning and Environmental Review  
827 7th Street, Second Floor  
Sacramento, CA 95814

**RE: Sacramento County Draft Climate Action Plan**

Mr. Smith:

Thank you for the opportunity to comment on the March 2021 draft Climate Action Plan.

**Measure GHG-02: Urban Forestry** In addition to the climate benefits, trees are very important to the physical and mental health of people, and they moderate local temperatures which makes travelling by active transportation more pleasant. We are pleased to see that EJ communities will be prioritized for planting trees, as those communities are deficient in tree canopy and residents suffer the greatest health problems associated with a lack of trees. We are also pleased to see that proper maintenance of trees planted through the Zoning Code will be ensured. We recommend revising the last sentence of the implementation as follows: Forge partnerships with community cooperatives to organize tree-planting, ~~and~~ maintenance events, and education on the benefits of trees and the proper care and pruning of trees.

**Measure GHG-15: Improved Pedestrian Network and Facilities** Revise the second bullet as follows: Develop a methodology for prioritizing future pedestrian improvements ~~which could be~~ based on safety, projected pedestrian demand, and deficiency.

**Measure GHG-20: Safe Routes to School** Revise the last sentence of the implementation as follows: Additionally, the County will include analysis of safe routes to school within the Active Transportation Plan update and future General Plan Transportation Plan updates, and it will factor the analysis in to the prioritization of improvements in those Plans.

**Measure GHG-23: Incentivize Infill Development** The proposed infill fee to be applied to development that increases VMT and green house gas emissions will provide some funding to facilitate infill development, but the measure doesn't include any implementation actions that would incentivize infill development. Are there actions developed within the County's infill development program that could be implemented and enhanced as part of Measure GHG-23?

**GOV-EC-01: Employee Transportation Program** The County is the 4<sup>th</sup> largest employer in Sacramento County and it should take a demonstrative lead in transportation planning for employees by: conducting an employee commute survey rather than using the 2010 survey; adopting Transportation System Management Plans as described by the Zoning Code at a county-wide level and for large individual sites with 500 or more employees as part of the proposed County Employee Transportation Demand Management Program; and including local bike-to-workdays, months, and events in addition to regional and national. Waiving parking fees for employees driving EVs to county facilities may have emission reduction benefits, but it may have little impact on the measure's goal of reducing VMT.

**Gov-EC-05: Carpool-at-Work Incentives** In addition to incentives, the County should provide a tool for the employees to use scheduling shared travel.

**Measure TEMP-08: Increase Parking Lot Shading, Landscaping, and Urban Greening, Prioritizing Communities with Less Tree Cover** Add components of the rejected *Reduce Urban Heat Island Effects* measure, including: Amend the Zoning Code to include a more robust shade requirement; Conduct parking lot shade enforcement through site inspection to ensure that 50 percent shading is achieved by 15 years (Zoning Code section 5.2.4.C); and Work with business owners and residents to monitor and ensure landscaping and shading objectives are being met.

WALKSacramento is working to support increased physical activity such as walking and bicycling in local neighborhoods as well as helping to create community environments that support walking and bicycling. The benefits include improved public health and physical fitness, better air quality, a stronger sense of cohesion and safety in neighborhoods, and more sustainable communities and local economies.

Sincerely,

Chris Holm  
Project Manager



# SIERRA CLUB

## SACRAMENTO GROUP

909 12<sup>th</sup> Street, Room 202

Sacramento, CA 95814

[sacramentosierraclub@gmail.com](mailto:sacramentosierraclub@gmail.com)

June 22, 2021

Todd Smith, Principal Planner  
John Lundgren, Senior Planner  
County of Sacramento  
Department of Community Development,  
Planning, and Environmental Review  
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County Board of Supervisors, Chair Frost, Vice-Chair Nottoli, Serna, Kennedy, & Desmond  
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RE: Sacramento County Climate Action Plan (CAP)

Dear Staff and Supervisors,

I am writing in follow up to the discussion that took place during in the most recent stakeholder group meeting with County and Ascent staff during which we received some feedback regarding submitted comments re: the Public Draft of the CAP.

The Sacramento Group of the Sierra Club has expressed ongoing concerns regarding land use and conservation, and the importance of addressing the negative climate change effects that will result if there is insufficient support for existing goals in the County General Plan to reduce greenhouse gas emissions and improve carbon sequestration.

Our previously submitted letter, dated April 9, 2021, detailed how the County could accomplish meeting the goals of its Climate Emergency Plan and achieve more carbon reductions through CAP measures that support the goals of the General Plan. We have concluded that the following measures, some of which have been submitted previously, should be included in the CAP:

- 1) The CAP should include, for the area between the USB and the County border and greenfield within the UPA, calculations of a) the existing carbon sequestration capacity of those lands and b) if this area were developed, the resulting increase in GHG/VMT with the proposed density of development. This would enable an assessment of the actual deficits in carbon reduction that will occur if development is allowed to proceed.

- 2) Any new development into existing greenfield areas must demonstrate that the project will be carbon neutral.
- 3) Any changes to the existing General Plan should not be considered until a CAP is able to demonstrate that the goals of the recently adopted Climate Emergency Plan can be met and sustained.
- 4) The CAP should list and describe the financial incentives for infill the County intends to provide.
- 5) The CAP should list and describe the economic benefits to the County of reducing emissions.
- 6) The CAP should require development to meet the goals that the General Plan has set for environmental sustainability and equity, with acceptable risk assessment profiles for investment.
- 7) All carbon offsets must be done locally, within the County of Sacramento. All mitigation for the loss of carbon sequestering land and forests must be done within the county.
- 8) The CAP should specify how new and retrofit development projects can take advantage of the SMUD incentive plans to electrify all new homes and commercial development. Please see the City of Sacramento Electrification Ordinance, passed on June 1, 2021 linked here: [https://www.cityofsacramento.org/Community-Development/Planning/Major-Projects/General-Plan/About-The-Project/Climate\\_Change/Electrification-Ordinance](https://www.cityofsacramento.org/Community-Development/Planning/Major-Projects/General-Plan/About-The-Project/Climate_Change/Electrification-Ordinance) . The City of Davis Ordinance incentivizing electrification of new construction ordinance is attached.
- 9) Substantial evidence of support for measures to be undertaken to meet the stated goals, and compliance with CEQA standards must be demonstrated.

Thank you for your consideration of these additional comments.

Sincerely,



Barbara Leary, Chair, Sierra Club – Sacramento Group

Attachments:

- 1) ORDINANCE OF THE CITY COUNCIL OF THE CITY OF DAVIS AMENDING SECTION 8.01.0 92 OF THE DAVIS MUNICIPAL CODE TO ADOPT NEW ENERGY EFFICIENCY STANDARDS FOR NEW SINGLE FAMILY AND LOW-RISE MULTIFAMILY DWELLINGS
- 2) Title 24, Parts 6 and 11 Local Energy Efficiency Ordinances 2019
- 3) Cost - effective ness Study: Low - Rise Residential New Construction
- 4) City of Sacramento Electrification Ordinance, passed 6/2/2021, [https://www.cityofsacramento.org/Community-Development/Planning/Major-Projects/General-Plan/About-The-Project/Climate\\_Change/Electrification-Ordinance](https://www.cityofsacramento.org/Community-Development/Planning/Major-Projects/General-Plan/About-The-Project/Climate_Change/Electrification-Ordinance)