



September 30, 2019

Chris Erias, Community Development Director
Planning Division
City of Galt
495 Industrial Drive, Galt, CA 95632

Via e-mail

Dear Mr. Erias,

CITY OF GALT, DRAFT CAP: COMMENTS

Thank you for the opportunity to comment on the City of Galts' *Draft Climate Action Plan* (CAP). We encourage all efforts to expedite the transition to a carbon-free economy and are gratified by the County's aspiration to reduce greenhouse gas (GHG) emissions. We understand that the administrative public review process has not begun, but offer these early comments in the hope they will help the County reach that goal.

ROLE OF CLIMATE ACTION PLANS

California has determined that climate change is a serious and immediate threat. Climate-forcing GHG emissions are one type of impact that lead agencies must consider under the California Environmental Quality Act (CEQA). An agency may do so either on a project-specific basis, or at a programmatic level via a "Climate Action Plan" (CAP).¹ CAPs themselves also require CEQA review.² If there is substantial evidence (i.e., a "fair argument") that approving a project or plan may have a significant impact, an Environmental Impact Report is prepared.³

Correctly done, CAPs can provide more comprehensive and detailed GHG-reduction than is practical on a project-specific basis; ensure analysis of cumulative impacts; and allow consideration of broad policy and program-wide alternatives and mitigation not feasible during project-level review.⁴ CAPs can also provide co-benefits such as better air quality and associated health outcomes, habitat protection, more livable communities, and economic savings through energy and mobility efficiencies.

¹ *California Code of Regulations*, Title 14 (14 CCR) §15183.5 (b). CEQA regulations use the term "greenhouse gas reduction plans"; "CAP" is the common designation.

² *Golden Door et al v. County of San Diego* (2018), Cal. Ct. App., 4th.

³ 14 CCR §15064

⁴ 14 CCR 15168(b)

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Criticality of Local Climate Action.

Local climate action is important because the largest sources of GHG, in the City of Galt as well as statewide, are building energy and on-road vehicle travel.⁵ Both are best and most directly controlled locally, by adopting energy-efficient building codes and requiring efficient development that reduces the need for auto “vehicle miles traveled” (VMT). State climate policy is premised on reduction of GHG via local land use decisions. The California Supreme Court has recognized that “*Local governments...bear the primary burden of evaluating a land use project’s impact on greenhouse gas emissions*”.⁶ SB 375 instructs that GHG reductions are to result from efficient development and transportation patterns. CARB’s *Scoping Plan*⁷ notes local government’s central role in developing, “land use plans with more efficient development patterns that bring people and destinations closer”, and its SB 375 staff report states SB 375’s targets should be “achieved predominantly through strategies that reduce” VMT. Absent effective, widespread use of local authorities, it will be impossible to meet California’s GHG-reduction goals (we further discuss State and local roles in reducing GHG below, under “Compliance with 2030 Target due to State Programs”).

CAP “Streamlining” Function. If a jurisdiction adopts a CAP compliant with CEQA, future projects that comply with the CAP’s provisions may tier their GHG analysis from the CAP’s environmental document and are relieved of further GHG mitigation. This “streamlining” is efficient for lead agencies and project proponents. However, a weak CAP can be worse than none, because inadequate measures may be asserted as sufficient mitigation for future projects.

CEQA’s Enforceability Requirements. A fundamental prerequisite of CEQA mitigation is that it be certain, i.e., “*fully enforceable through permit conditions, agreements, or other legally binding instruments*.”⁸ If CAP measures are not fully enforceable, they must be made so at the project level, and if there is substantial evidence that the measures would be inadequate, GHG impacts must be analyzed in the project EIR.⁹ A CAP proposing non-enforceable measures thus fails its streamlining function, and such CAPs create process uncertainty, ill-serving the lead agency and project proponents. Enforceable and otherwise credible GHG-reduction mitigation is incumbent on project proponents, whether CEQA-compliance is tiered or project-specific, and lead agencies are prohibited from approving projects if feasible mitigation measures would reduce impacts.¹⁰

INAPPROPRIATE USE OF STATEWIDE TARGETS

Projects proceeding in compliance with a CAP may not need to establish project-level thresholds of significance for GHG emissions. For CAP purposes, the City proposes to use CARB’s statewide targets without modification or analysis.¹¹ This appears inconsistent with judicial guidance: using a statewide criterion requires evidence and explanation to substantiate

⁵ On road transportation and building energy (electricity/natural gas) comprised respectively 45 and 35 percent of Galt’s total 2016 GHG emissions. CAP, *Figure 4*.

⁶ *Center for Biological Diversity v. California Dept. of Fish and Wildlife* (2016) 62 Cal.4th 204.

⁷ California Air Resources Board. *California’s 2017 Climate Change Scoping Plan* (November 2017).

⁸ 14 CCR §15126.4(a)(2)

⁹ 14 CCR §15183.5(b)(2)

¹⁰ 14 CCR §15021(a)(2); §15096(g)(2)

¹¹ CAP. p. 4-1, Table 1

that the effort required in a statewide context will suffice for a specific project; and a greater degree of GHG reduction may be needed from new land use projects than from the economy as a whole.¹²

CAP'S FAILURE TO COMPLY WITH TARGETS

The CAP asserts,

"... this CAP ensures that the City of Galt will achieve the legislative requirements of SB 32, and sets the City on a trajectory for achievement of the legislative emissions reduction requirement of AB 32 and the per capita emissions targets for the year 2050".¹³

These statements seem unsupported. As noted above, the City has not shown that applying statewide targets will achieve mandated reductions. And as discussed below, assertions that CAP measures are responsible for any 2030 compliance, and that adequate progress is being made to achieve the 2050 goal, are unsubstantiated.

Compliance with the 2030 Target is due to State Programs

Any City of Galt compliance with the 2030 statewide target is due not due to projected CAP measures, but to State GHG-reduction programs, which,

*"... have been enacted irrespective of the adoption of a CAP by the City of Galt, and ... act to reduce GHG emissions from existing and future development within the City"¹⁴.
"Thus, with consideration of existing statewide emissions reductions policies, per capita emissions within the City are anticipated to be below the CARB's 2030 per capita emissions goal".¹⁵*

That the projected, temporary, reduction of community emissions is due to State programs is graphically displayed in CAP *Figures 5 and 8*.

The State has indeed achieved dramatic projected GHG reductions through its Renewable Portfolio Standard, Cap-and-Trade, and other programs.¹⁶ However, opportunities to apply State regulatory authority to large institutional emitters are now exhausted, and little further GHG-reduction is expected from statewide efforts. State programs have been effective in bringing the State as a whole into compliance with 2020 and 2030 goals; but they cannot and will not take the State to the mandated 2050 reduction-level.

The CAP Fails to Meet the 2050 Target.

There is no reason to believe that the City of Galt is currently on track to meet the 2050 target. Recognizing that no further reductions are expected from statewide programs, the CAP projects that the City will not meet the State's 2050 *per capita* GHG-reduction target, and addresses this shortfall by asserting that (1) the CAP's proposed mitigation measures will make substantial progress towards the target; and (2) that, "*... future updates to the CAP will allow for the*

¹² *Center for Biological Diversity supra; Sierra Club v County of San Diego* (2018) Cal App.4th.

¹³ CAP, p. 5-27

¹⁴ *ibid.*, p. 4-11

¹⁵ *ibid.*, p. 4-16

¹⁶ E.g., see listing in CAP Chapter 2.1

incorporation of new emissions reduction technologies and methodologies that are not currently known".¹⁷

Both assertions are problematic, as discussed below.

PROPOSED MITIGATION MEASURES

CAP-Listed Measures are Not Credible

The City's CAP, Chapter 5, presents 86 Action Items (mitigation measures). Many of these have substantial potential to reduce GHG emissions, and we encourage the City to refine and strengthen them to make them actionable and certain. Currently, however, most or all appear to not meet CEQA's requirements for mitigation because they are conceptual rather than being clearly enforceable, i.e., they are described ambiguously, do not specify enforcement mechanisms, are not funded, impermissibly defer mitigation, propose partnerships with uncertain effect, refer to another plan or policy without specific effect, do not include implementation schedules, do not specify a performance standard, and/or are voluntary. Attachment 1 to these comments presents measure-specific evaluations and a statistical overview.

Reliance on Unknown Future Measures is Impermissible

The above-cited reliance on, "*technologies and methodologies that are not currently known*", which is absent a commitment to implement such measures; relevant performance standards; or identification of the "unknown" measures, appears to be an impermissible deferral of mitigation.¹⁸ In defense of this approach, the CAP asserts, "...*the proliferation of zero emissions passenger and freight vehicles as well as autonomous vehicles is one example of an impending technological change*". The named technologies are *prima facie* not "unknown", and in fact CAP Transportation Measure 5 presents seven action items purporting to "Support Electric Vehicle Charging Infrastructure". If superior mitigation methods become available in the future, they can be substituted for those currently known during CAP updates.

As noted previously, lead agencies are prohibited from approving projects if feasible mitigation measures are available and would reduce impacts. There is no need to invoke the promise of speculative future technologies because feasible, well-known, GHG-reduction measures are available. As mentioned above, the CAP references some of them. What's lacking is specificity and commitment to implement.

Feasible, Enforceable GHG-Reduction Measures are Available

As noted above, further reductions must rely on local initiatives. Absent effective City measures, total GHG loadings will increase, as shown by CAP *Figure 10*. Galt's two major sources of GHG, VMT and building energy, must and can be reduced through local land use authorities. Among the potentially enforceable CAP measures identified in Attachment 1 to these comments, CAP measure LUM-2.1 proposes integration of SACOG's *Blueprint Document* principles¹⁹ into Galt's *Development Guidelines*. The *Blueprint* identifies "smartgrowth" planning principles

¹⁷ *ibid.*, p. 5-27

¹⁸ CCR 14 §15126.4(a)(1)(B)

¹⁹ Sacramento Area Council of Governments, *Sacramento Region Blueprint* (2004)

which would credibly reduce Galt's future GHG emissions if properly codified, and we urge the City to do so.

"Using the CAP". CAP Chapter 1.4 indicates:

"For measures to be implemented by the municipal government, this CAP identifies the responsible department for each measure and offers time frames and plan-level cost estimates...."

The three cited information elements are not presented.

GHG-Reduction Calculations. Our present comments do not evaluate the assumptions and calculations used to project GHG reductions, as presented in the CAP's un-titled Appendix.

IMPLEMENTATION - CAP MONITORING AND UPDATE INSUFFICIENT

CAP Chapter 6, "Implementation" presents the two following measures re how the CAP will be implemented.²⁰ Our bulleted concerns follow each measure.

Plan Update. The CAP states that,

"... future updates to this CAP will be necessary ... the City of Galt shall seek to update the CAP at least once within each ten-year period following the adoption of the CAP. The City may also choose to amend this CAP more frequently.... updates to the CAP shall include updated emissions inventories."

- We agree that CAP updates are necessary for the reasons cited in the CAP. CEQA requires adoption of an enforceable program to monitor a CAP's progress and to require plan amendments if needed.²¹ The CAP at this point does not present such a program. Additionally, the phrases "seek to", and "may ... choose" do not provide the required certainty of update, particularly given the uncertain efficacy of the proposed measures.
- The proposed ten-year update interval for the CAP and GHG Inventory is excessive. In mitigating climate change, time is of the essence, because the climate forcer is the total amount of GHGs emitted over time. Reaching a given target quickly is more effective than reaching it later. For this reason it's essential to monitor the efficacy of implementation timely and correct deficiencies promptly. Shorter update intervals are feasible and customary. The six cities in Sacramento and Yolo Counties that have adopted CAPs have all committed to more frequent updates, with the average being under five years, as displayed in Attachment 2 to these comments.

Checklist. The CAP indicates,

"To assist developers in determining which reduction measures must be implemented ... City Staff shall draft a sustainability checklist [which] ... shall include a succinct list of measures required to be implemented by future development, which shall ensure that future development complies with the emissions reduction measures included in this CAP."

²⁰ CAP, p. 6-2

²¹ 14 CCR §15091(d); §15097(a); §5183.5 (b)(1)(E)

- The above-mentioned insufficiencies in the CAP measures make it impossible to know if or how they would be meaningfully applied. This should be clarified for developers, the general public, and decision-makers in the CAP itself, not deferred to a future administrative process free of public review. In further explaining, "... *strategies would be implemented by private developers within the City of Galt, under the guidance and direction of City staff*",²² the CAP seems to reaffirm that implementation would not be based on policy-body adoption of enforceable measures, but on discretionary staff "guidance and direction".
- Draft staff documents can't "ensure" anything until adopted by policy makers, and any such adoption is speculative. Reliance on a future checklist without a commitment to implement; identification of relevant performance standards; and specification of the checklist's proposed content, appears to be impermissible deferral of mitigation.
- The effect of this measure purports to be to, "*ensure future development complies with ... measures included in this CAP*". If the City wishes to ensure compliance with CAP measures, it can simply frame them in enforceable terms, and commit to their enforcement, thus fulfilling CEQA requirements and achieving CEQA streamlining.

FUNDING APPROACH IS PROBLEMATIC

As noted above, no funding is identified for the CAP's measures, most of which involve City staff work. The CAP states that, "*Using this CAP as a starting block, the City will be able to pursue funding through various federal, state, and regional programs...*".²³

We encourage pursuit of competitive grant funding to facilitate discretionary GHG-reduction projects. Such funding may support development of GHG mitigation measures which we believe could legitimately be claimed when a CAP is subsequently updated. However, because GHG mitigation for CEQA-regulated projects is not discretionary, it cannot be contingent on speculative grant awards.

We note again that building-energy and on-road transportation are Galt's biggest GHG sources. Mitigation for these sources is primarily achieved via enhanced building energy and land use efficiency standards for new development; and systematic efficiency upgrades of existing building stock over time. Such feasible, effective measures are codified and enforced through routine municipal operations, without need for grant funding or unusual tax-payer expense.²⁴

A WORD ABOUT CLIMATE CHANGE

There is no longer any rational doubt that climate change is adversely affecting the livability of our planet now; that physical environmental effects will grow increasingly serious in coming

²² CAP, p. 6-2

²³ CAP, p. 6-3

²⁴ Resiliency investments may require different funding approaches than ensuring sustainability in new development. A recent report describes funding mechanisms currently used by eight US cities: Innovation Network for Communities and Climate Resilience Consulting. *Playbook 1.0: How Cities Are Paying for Climate Resilience*. (July 2019). Available online.

decades; and that without major, timely GHG-reductions, they will cause grave public health impacts and severe economic and social disruptions in the lifetimes of children alive today.²⁵

We appreciate the difficulties transitioning from the long-accustomed land use and building models that have contributed to climate change to sustainable ones, and doing it quickly. But the exigencies of climate change, as reflected in State law, require broad and decisive change in how we use and think about energy. The required adjustments will bring many co-benefits, and we no longer have the luxury of delayed or token efforts.

Our organizations are committed to working with Galt in every productive way we can. We look forward to ongoing engagement in the City's administrative process and may provide specific suggestions in future comments re EV standards, Title 24 reach codes, and SB 375 compliance.²⁶

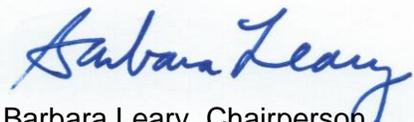
Sincerely,



Laurie Litman, President
350 Sacramento



Ralph Propper, President
Environmental Council of Sacramento



Barbara Leary, Chairperson
Sacramento Group, Sierra Club

²⁵ Literature on climate change effects is vast. We list here a few recent, authoritative syntheses of current knowledge. All emphasize the need for prompt, dramatic reductions in GHG emissions to avoid catastrophic impacts pertaining to their particular research focus:

California Resources Agency. *California's Fourth Climate Change Assessment* (2018).

U.S. Global Change Research Program. *Fourth National Climate Assessment* (November 2018).

Intergovernmental Panel on Climate Change, (IPCC). *Special Report on Global Warming of 1.5°C* (October 2018).

Intergovernmental Science Policy Platform on Biodiversity and Ecosystem Services. *Global Assessment Report on Biodiversity and Ecosystem Services* (May 2019).

IPCC. *Special Report on Climate Change and Land Use* (August 2019).

IPCC. *Special Report on the Ocean and Cryosphere¹ in a Changing Climate* (September 2019).

²⁶ 14 CCR §15064.3

ATTACHMENT 1

REVIEW OF ACTION ITEMS

Importance of of Action Items

The CAP's 86 Action Items comprise the City's GHG commitments, providing the clearest indication of the CAP's potential efficacy; and they would provide the most immediate basis to monitor future implementation.

Because the Action Items are central to implementing, monitoring, and assessing the CAPs GHG-reduction Measures, the Table 2 below characterize each by nine parameters relating to its implementability and legal adequacy.

Evaluation Parameters

The evaluation parameters and their abbreviations as used in the Table 2 are listed below. The number / and percent of total of actions meeting the parameter criteria are shown in parenthesis (e.g., 86 / 100%):

- CRED **Credible.** The Action is clearly described, scheduled, feasible, enforceable, and potentially effective. (2 / 2%)
- AMBG **Ambiguous.** The Action is described ambiguously, or in aspirational terms too undefined to clearly denote or commit to what is proposed (e.g., "*consider*", "*seek*", "*work with*", "*promote*", "*encourage*", "*pursue*"). (67 / 78%)
- ENFC **Not Enforceable.** The Action does not clearly specify a means of enforcement assuring implementation of any directly effective GHG reduction measure. (81 / 94%)
- FUND **Funding.** The Action proposes City staff work outside of routine municipal operations, without identifying needed funding and funding source; making it difficult to evaluate feasibility and cost-effectiveness, making near-term implementation unlikely, and deferring implementation to unspecified or speculative future budgeting. (72 / 84%)
- DFRD **Deferred Mitigation.** The Action defers formulation of a mitigation measure to the future, without (1) committing to mitigation; (2) identifying specific performance standards; and (3) identifying potential action(s), or compliance with a regulatory permit or similar process to achieve that standard, per CCR 14 §15126.4. (33 / 38%)
- PART **Partner.** The Action proposes partnership or collaboration with some other entity without specifying the nature of the partnership, and/or what the City and the partner's contributions will be, and/or the entity's willingness and ability to participate. (14 / 16%)
- PLAN. **Plan.** The measure references some other plan or policy without clearly explaining its purported effect, making it difficult to evaluate what/whether implementation will

occur; and during later monitoring whether it is being implemented adequately to achieve its goals. (9 / 10%)

SCHD Schedule. The action does not include a schedule of performance, making it difficult to determine whether timely implementation would occur or is occurring timely; or the measure inappropriately suggests implementation would begin in 2050; or the action is identified as continuing and should already be reflected in the City’s 2016 GHG Inventory. (82 / 95%)

STND Applicable Standard. The Action proposes regulatory, planning, or voluntary action without specifying a standard of performance to be applied, or uses an inappropriate standard, making it impossible to assess potential efficacy. (51 / 59%)

Review of Action Items

TABLE 1: ACTION ITEMS IN SELECTED CATEGORIES

Number of Action Items and percent of total in following categories:

Category	Number of Actions	Percent of Total
Total number of action Items	86	100%
Deemed credible (i.e., CRED above)	2 ²⁷	2%
Deemed enforceable (i.e., not ENFC above)	5	6%
Schedule of performance indicated	4 ²⁸	5%
Actions implemented by City staff ²⁹	76	88%
Funding identified for actions Implemented by City staff	0	0%
Requirement for new development	10 ³⁰	12%

²⁷ BEM-2.1; BEM-2.2.

²⁸ BEM-2.1; BEM-2.2; BEM-2.3; WM-3.1

²⁹ Absent any enforceable component.

³⁰ TM-1.8; TM-3.3; TM-5.3; TM-6.2; TM-9.3; TM-6.2; TM-7.3; TM-9.1; TM 9.2; BEM-2.1; BEM-2.2

TABLE 2: REVIEW OF ACTION ITEMS BY DEFINED PARAMETERS

Note: Underlined text may provide some indication of the evaluation basis.

	<u>MEASURE</u>	CRED	AMBG	ENFC	FUND	DFRD	PART	PLAN	SCHD	STND
TM-1	Transportation Measure 1: Bicycle and Pedestrian Infrastructure Improvement									
TM- 1.1	Implement the City of Galt Bicycle Transportation Plan to <u>improve</u> bicycle infrastructure within the City of Galt, and continue implementation of General Plan Goal C-6 and Policies C-6.1 through C-6.11, which <u>promote</u> the use of alternative means of transportation within the City.		X	X	X			X	X	X
TM-1.2	The City of Galt shall ensure that the City of Galt Bicycle Transportation Plan is updated in accordance with <u>any future updates</u> to the City of Galt's General Plan.		X		X	X		X	X	
TM-1.3	<u>Review</u> new development proposals to <u>ensure</u> that proposed infrastructure accommodates <u>safe</u> routes to school, pedestrian infrastructure, and bicycle infrastructure.		X	X					X	X
TM-1.4	The City will <u>work to identify</u> areas for expansion and upgrade of the existing pedestrian and bicycle infrastructure within the City.		X	X	X	X			X	X
TM-1.5	<u>Should the</u> Carillion Boulevard Transportation Corridor Management Plan be adopted, the City shall <u>seek to implement</u> the recommendations of the Plan that <u>encourage</u> the use of alternative means of transportation within the City of Galt.		X	X	X	X		X	X	
TM-1.6	<u>Consider adoption</u> of a Complete Streets <u>Ordinance</u> .		X	X	X	X			X	X
TM-1.7	<u>Consider</u> adopting minimum standards for bicycle parking at new developments.		X	X	X	X			X	X
TM-1.8	Continue to require new developments to include bicycle and pedestrian path connections on- and off-site.		X	X					X	X
TM-1.9	Periodically <u>consider feasibility</u> of allowing bike share programs within the City of Galt based on <u>changes in technologies</u> and the City's population.		X	X	X	X			X	
TM-1.10	<u>Promote</u> destination facilities such as lockers and showers at new development through <u>voluntary</u> development design guidelines.		X	X	X				X	X
TM-1.11	<u>Promote</u> installation of bicycle and pedestrian infrastructure at existing private developments within the City.		X	X	X				X	X
TM-2	Transportation Measure 2: Increase Use of Mass Transit									
TM-2.1	<u>In concert with</u> South County Transit, <u>seek to increase</u> the frequency and locations of existing bus service within the City to meet ridership needs.		X	X	X	X	X		X	X

	<u>MEASURE</u>	CRED	AMBG	ENFC	FUND	DFRD	PART	PLAN	SCHD	STND
TM-2.2	Through <u>consultation</u> with South County Transit, establish a timeline for <u>potential</u> future expansion of bus service within the City based on projected development within the City and population growth.			X	X	X	X		X	
TM-2.3	Continue <u>work with</u> SACOG, South County Transit, and other relevant agencies related to the implementation of commuter rail service (in compliance with Policy C-5.5 of the City of Galt's General Plan).		X	X	X	X			X	
TM-2.4	<u>Consider drafting</u> a comprehensive Transit Plan (in compliance with Policy C-5.7 of the City of Galt's General Plan), including plans for expansion of mass transit within the City of Galt based on specific population and ridership growth metrics.		X	X	X	X		X	X	
TM-3	Transportation Measure 3: Safe Routes to School									
TM-3.1	<u>Implement</u> the City of Galt Bicycle Transportation Plan to <u>improve</u> bicycle infrastructure within the City.		X	X	X		X	X	X	X
TM-3.2	<u>Ensure</u> new school campuses within the City of Galt include designations of Safe Routes to School for each new school site.		X	X	X		X	X	X	X
TM-3.3	Require new development proposals within areas designated as Safe Routes to School to <u>show</u> pedestrian and bicycle <u>improvements</u> within development plans <u>sufficient</u> to provide students with a <u>safe</u> means of walking or bicycling to school.		X	X				X	X	X
TM-3.4	<u>Work with</u> local school districts to <u>promote</u> walking or biking school buses wherein groups of students walk or bicycle to school under the supervision of designated chaperones.		X	X	X				X	
TM-4	Transportation Measure 4: Optimize City Fleet									
TM-4.1	<u>Consult with</u> relevant agencies to <u>seek</u> grant funding opportunities to support the purchase of fuel-efficient vehicles.		X	X	X				X	
TM-4.2	<u>Set goal</u> for increased average mpg for the portion of the City's vehicle fleet that is fossil fueled.			X	X	X			X	X
TM-4.3	<u>Implement policies</u> for use of alternative fuel vehicles.		X	X	X	X			X	X
TM-4.4	<u>Encourage</u> a reduction in idling time for City vehicles through education of City field crews.			X	X				X	X
TM-4.5	<u>Encourage</u> the Galt Joint Union High School District and the Galt Union Elementary School District to replace diesel-powered school buses with CNG buses, hybrid buses, or other emissions-reducing and zero emissions alternatives.		X	X	X				X	
TM-4.6	<u>Investigate</u> the use of alternative fuels, such as biodiesel and renewable natural gas for vehicle fuel.		X	X	X				X	

	<u>MEASURE</u>	CRED	AMBG	ENFC	FUND	DFRD	PART	PLAN	SCHD	STND
TM-5	Transportation Measure 5: Support Electric Vehicle Charging Infrastructure									
TM-5.1	Seek funding to support installation of EV charging technology within the City of Galt.		X	X	X				X	X
TM-5.2	<u>Identify potential sites</u> for EV charging stations within City-owned property.			X	X				X	
TM-5.3	<u>Update Municipal Code</u> to require EV charging stations and infrastructure as part of new residential, commercial, and industrial development.				X				X	X
TM-5.4	<u>Establish targets</u> for the number of EV charging stations installed at public parking areas.			X	X	X			X	X
TM-5.5	<u>Require installation</u> of EV charging stations at all new municipal facilities that include vehicle parking.			X	X				X	X
TM-5.6	The City shall <u>identify</u> existing municipal facilities where EV charging stations could be installed. Once feasible sites are identified, the City shall <u>pursue grant</u> funding for installation of public EV charging infrastructure.			X	X				X	X
TM-5.7	<u>Should</u> the City construct or operate areas with paid parking, EVs shall be exempt from payment of parking fees to encourage use of EVs within the City.		X	X	X				X	
TM-6	Transportation Measure 6: Establish a Transportation Management Association									
TM-6.1	In concert with SACOG, South County Transit, SMAQMD, and other local jurisdictions, the City shall <u>seek to establish</u> or participate in or form a TMA.		X	X	X		X		X	
TM-6.2	New developments exceeding the size criteria presented in Policy COS-6.7 of the City's General Plan (projects including over 200 full time employees or 500 homes) shall be <u>required</u> to demonstrate membership within <u>future TMAs</u> servicing the City of Galt, prior to approval of development plans.		X	X		X			X	
TM-6.3	<u>Establish a TMA funding</u> mechanism, through a community facilities/services district, membership fee, or other means.		X	X	X	X			X	
TM-7	Transportation Measure 7: Promote Anti-Idling/Congestion Management Strategies									
TM-7.1	The City shall <u>consider</u> updating <u>design guidelines</u> for new developments to include <u>suggested</u> designs for intersections and roadway segments that include Anti-Idling/Congestion Management Strategies.		X	X	X	X			X	X
TM-7.2	The City shall <u>identify areas</u> within the City Limits where safety or congestion has become a <u>concern</u> and <u>work to develop</u> Anti-Idling/Congestion Management Strategies suitable for addressing such concerns.		X	X	X	X	X		X	X

	<u>MEASURE</u>	CRED	AMBG	ENFC	FUND	DFRD	PART	PLAN	SCHD	STND
TM-10.1	The City shall select an existing program, such as Sac Region 511, or seek to create a proprietary program that will <u>promote</u> alternative transportation. The program chosen should assist the City in monitoring the number of residents participating within the program as well as the VMT avoided through the use of alternative transportation.		X	X	X	X			X	X
TM-10.2	<u>Following</u> selection of a suitable program, the City shall coordinate with agencies, businesses, and local school districts to create <u>incentive programs</u> and community events <u>promoting</u> the program. The City shall also seek to promote participation at community events such as the Galt Market, the City's Independence Day Celebration, Lighting of the Night, the Winter Bird Festival, or other events.		X	X	X	X	X		X	X
TM-10.3	<u>Following</u> establishment of the program, the City shall <u>track</u> resident engagement through annual assessment of the number of residents participating in the program and the VMT avoided through participation in the program. The City may coordinate with SACOG to determine the level that City of Galt residents participate in the Sac Region 511.		X	X	X	X	X		X	X
LUM-1	Land Use Measure 1: Encourage Reuse									
LUM-1.1	<u>Consider</u> reducing impact fees for development that includes <u>reuse</u> of existing structures or infill development.		X	X	X	X			X	X
LUM-1.2	<u>Provide</u> for streamlined project <u>review</u> of projects including reuse of existing structures or infill development.		X	X	X				X	
LUM-2	Land Use Measure 2: Sustainable Growth									
LUM-2.1	<u>Continue</u> to <u>integrate</u> SACOG's Blueprint Growth Principles into the City of Galt's Development Guidelines.		X	X	X				X	
LUM-2.2	<u>Establish standards</u> for "walkable neighborhoods", where new residential development shall be located within one half-mile of a combination of at least two of the following amenities: a park, a school, a grocery store, a commercial development, or employment type land uses. The placement of any new multi-family residential developments within "walkable neighborhoods" <u>should</u> be a <u>focus</u> of future review for such projects.		X	X	X	X			X	X
LUM-2.3	<u>Provide streamlined permitting process</u> for developments demonstrating consistency with SACOG's Blueprint Growth Principles.		X	X					X	
LUM-3	Land Use Measure 3: Urban Tree Program									
LUM-3.1	<u>Pursue</u> grant funding from CAL FIRE, USFS, California's Urban & Community Forestry Program, or <u>other agencies</u> to fund urban forestry planning within the City of Galt.		X	X	X				X	

	<u>MEASURE</u>	CRED	AMBG	ENFC	FUND	DFRD	PART	PLAN	SCHD	STND
LUM-3.2	<u>Prepare</u> and implement an Urban Tree Management Plan.			X		X			X	X
LUM-3.3	Update <u>landscape standards</u> to <u>encourage</u> shade over at least 25 percent of area in City parks and parking lots.		X	X	X	X			X	
LUM-3.4	<u>Seek opportunities</u> for partnerships with agencies promoting urban forestry such as ReLeaf California, and the California Urban Forests Council.		X	X	X		X		X	X
LUM3.5	Establish <u>increasing tree planting goals</u> with a target of planting 300 new trees per year by the year 2050.			X	X	X			X	X
BEM-1	Building Efficiency Measure 1: Building Stock Electrification									
BEM-1.1	In coordination with SMUD, the City shall <u>promote</u> SMUD's incentive programs for replacing natural gas appliances with <u>more efficient</u> electrically powered appliances.		X	X	X				X	X
BEM-1.2	The City shall <u>establish a goal</u> to reduce natural gas use by 15 percent from 2016 levels by the year 2030.			X	X				X	
BEM-1.3	The City shall <u>establish a goal</u> to reduce natural gas use by 50 percent from 2016 levels by the year 2050.			X	X				X	
BEM-1.4	The City shall <u>consider</u> offering a streamlined development process for developments that are demonstrated to be all electric, or have reduced <u>anticipated</u> natural gas usage to the <u>maximum extent feasible</u> .		X	X	X	X			X	
BEM-2	Building Efficiency Measure 2: Zero Net Energy									
BEM-2.1	<u>Require</u> that all new residential buildings within the City of Galt be <u>ZNE by the year 2020, or sooner</u> as required by intervening California Building Standards Code.	X								
BEM-2.2	<u>Require</u> that all new non-residential development within the City of Galt be <u>ZNE by the year 2030, or sooner</u> as required by intervening California Building Standards Code.	X								
BEM-2.3	<u>Seek funding</u> to upgrade existing municipal facilities to meet <u>ZNE standards by the year 2040</u> . ZNE at existing municipal facilities may be achieved through energy efficiency upgrades as well as installation of renewable energy systems.		X	X	X	x		X		

	<u>MEASURE</u>	CRED	AMBG	ENFC	FUND	DFRD	PART	PLAN	SCHD	STND
WM-2.1	The City of Galt shall <u>discuss potential</u> expansion of composting services with the City of Galt’s waste disposal service provider, Cal-Waste.		X	X	X				X	X
WM-2.2	The City of Galt shall <u>promote</u> Cal-Waste’s existing yard waste program, and <u>any future</u> expansion of organics collections.		X	X	X		X		X	X
WM-2.3	The City of Galt shall <u>consider</u> innovative new technologies for facilitating composting, such as the use of biodigesters or composting facilities.		X	X	X				X	X
WM-2.4	The City of Galt shall establish <u>waste reduction goals</u> in-line with Statewide waste reduction requirements (AB 87, AB 1572, AB 939).		X	X	X				X	X
WM-3	Waste Measure 3: Biodigester									
WM-3.1	By no later than 2030, the City of Galt shall <u>investigate</u> the feasibility of the use of biodigesters to accept organic wastes produced within the City, including wastes collected by Cal- Waste as well as sludge from the wastewater treatment process.		X	X	X					X
WM-3.2	To <u>enhance</u> the economic <u>feasibility</u> for a potential future biodigester, the City of Galt shall <u>consider</u> potential organic waste sources from areas outside of the City, including other areas serviced by Cal-Waste, and agricultural or livestock operations within the region.		X	X	X				X	X
WM-3.3	The City of Galt shall <u>seek public-private and/or public-public partnerships</u> to increase the economic feasibility of construction and operation of a biodigester.		X	X	X				X	X
WM-3.4	The City of Galt shall <u>seek grant funding</u> to support the construction and operation of a future biodigester.		X	X	X				X	X
	Number of measures meeting Parameter criteria	2	67	81	72	33	14	9	82	51
	Percent of Total	2	78	94	84	38	16	10	95	59

ATTACHMENT 2

**CAP UPDATE FREQUENCY
SACRAMENTO AND YOLO COUNTY CITIES**

Jurisdiction	Document, Adoption Date	CAP Update Frequency (Years)	GHG Inventory Update Frequency (Years)
Sacramento, City	Sacramento Climate Action Plan, March 3, 2015	5	5
Elk Grove, City	Climate Action Plan: 2019 Update, February 27, 2019	5	3
Citrus Heights, City	Greenhouse Gas Reduction Plan, August 11, 2011	3	3
West Sacramento, City	Climate Action Plan, 2010.	5	5
Davis, City	Climate Action Plan, June 1, 2010	5	5
Woodland, City	Climate Action Plan, May 17, 2017	5	5

The update frequency of Climate Action Plans and GHG Inventories is shown for the six cities in Sacramento and Yolo Counties that have adopted CAPs. The average update frequencies are: CAPs = 4.6 years; GHG Inventories = 4.3 years.