
JACKSON TOWNSHIP DEIR -- GHG THRESHOLDS

This Attachment addresses two assertions presented in Section III. of these comments:

1. The County is Applying Thresholds of General Use

Tables 1-4 displays GHG thresholds used in the current Jackson Township DEIR and in three other recent (2017-2018) County EIRs. Bolded text highlights the 2020 and 2030 Thresholds. Wherever reported, these thresholds are identical for all four projects.

2. The DEIR's 2020 Targets are not Consistent with Those in the FEIR

Table 5 shows the FEIR's 2020 Thresholds.

Table 6 contrasts the FEIR's 2020 Thresholds, with those used in the current DEIR and other recent EIRs, There are substantial differences..

Table 1
Jackson Township Specific Plan DEIR

Table CC-2: Greenhouse Gas Significance Thresholds (Annual Metric Tons CO₂e)

Sector	2005 Baseline	2020 Target	2020 Thresholds	Draft 2030 Mass Emission Target	Draft 2030 Thresholds	2035 (Project-Specific Derived) Thresholds
Residential Energy	1,033,142	878,275	1.33 per capita	527,243	0.78 per capita	0.65 per capita
Commercial & Industrial Energy	772,129	656,914	7.87 per 1,000 sq ft	395,760	4.59 per 1,000 sf	3.81 per 1,000 sf
Transportation	2,046,617	1,757,236	2.67 per capita	1,055,172	1.57 per capita	1.30 per capita
Trucks	488,806	414,470	0.10 per 100 VMT	245,974	0.08 per 100 VMT	0.07 per 100 VMT

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Table 2
NewBridge Specific Plan DEIR, July 2018

Table CC-2: Sacramento County Greenhouse Gas Significance Thresholds (Annual MT CO₂e)

Sector	Thresholds of Significance	
	2020	2030
Residential Energy	1.33 per capita	0.78 per capita
Commercial & Industrial Energy	7.87 per KSF	4.59 per KSF

Table 3
Northborough (Rio Linda/Elverta Community) FEIR, Nov 2017

Table CC-2: Greenhouse Gas Significance Thresholds (Annual Metric Tons CO₂e)

Sector	2005 Baseline	2020 Target	2020 Thresholds	2030 Target	2030 Draft Standards
Residential Energy	1,033,142	878,275	1.33 per capita	527,243	0.78 per capita
Commercial & Industrial Energy	772,129	656,914	7.87 per Kft²	395,760	4.59 per Kft²
Transportation	2,066,970	1,757,236	2.67 per capita	1,055,172	1.57 per capita
Trucks	488,806	414,470	0.10 per 100 VMT	245,974	0.08 per 100 VMT

Table 4
Barrett Ranch East FEIR, April 5, 2017

Table CC-2: Greenhouse Gas Significance Thresholds (Annual Metric Tons CO₂e)

Sector	2005 Baseline	2020 Target	2020 Thresholds
Residential Energy	1,033,142	878,275	1.33 per capita
Commercial & Industrial Energy	772,129	656,914	7.87 per Kft²
Transportation	2,066,970	1,757,236	2.67 per capita
Trucks	488,806	414,470	0.10 per 100 VMT

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Table 5
2011 GP FEIR

Table CC-9 Sector Analysis (in MT) and Thresholds for Development

Sector	2005 Baseline	Percent of Total	Total Minimum Reduction in CO₂e	2020 Target	Thresholds
Residential Energy	1,033,142	15.80%	155,373	877,769	1.30 per capita
Commercial & Industrial Energy	793,163	12.10%	118,988	674,175	8.08 per Kft²
Wastewater	54,391	0.80%	7,867	46,524	--
Transportation Use	3,610,937	55.0%	540,854	3,070,083	4.56 per capita
Waste	201,399	3.10%	30,484	170,915	--
Agriculture	197,132	3.00%	29,501	167,631	--
High GWP	228,768	3.50%	34,418	194,350	--
Off-Road Vehicle Use	236,466	3.60%	35,401	201,065	--
Airport	200,404	3.10%	30,484	169,920	--
Total	6,555,802	100%	983,370	5,572,432	--
NOTES: [Not Shown for brevity]					

Table 6
2020 Thresholds - Comparison
2011 FEIR and Recent Project EIRs

Sector	<i>2020 Thresholds</i> 2011 FEIR	<i>2020 Thresholds</i> Project EIRs (Tables 1-4)
Residential Energy	1.30 per capita	1.33 per capita
Commercial & Industrial Energy	8.08 per 1K sq ft	7.87 per 1K sq ft
Transportation Use	4.56 per capita	2.67 per capita
Trucks	---	0.10 per 100 VMT