



April 6, 2020

County of Sacramento Board of Supervisors
Chair, Phil Serna, District 1
Patrick Kennedy, District 2
Susan Peters, District 3
Vice-Chair, Sue Frost, District 4
Don Nottoli, District 5

Clerk of the Board of Supervisors
Nav Gil, County Executive

Dear Board Members and Mr. Gil,

INITIATION OF COUNTY CLIMATE ACTION PLAN

Thank you for your leadership during the COVID-19 pandemic.

Thank you also for committing to initiate the County's Climate action Plan (CAP), and to discuss it during the Board's April 7, 2020 hearing on the County's *General Plan 2019 Annual Report*.

We are gratified that the CAP is included in the planning department's work plan, but disappointed that the Report asserts work won't begin until "a path forward is made clear" with the resolution of unspecified CAP-related lawsuits in other jurisdictions. Absent identification of such suits and explanation of why they preclude progress on the CAP, the County has not explained why it needs to continue its nine-year delay in fulfilling its greenhouse gas-reduction commitments (noted in Attachment).

As we've advised in previous correspondence¹, since the County committed to adopt a CAP in 2011, four other jurisdictions in the SACOG region have adopted CAPs which they consider "qualified", and three more are currently in active draft, notwithstanding pending litigation in other jurisdictions.

We recognize this is a difficult time to begin new initiatives, but with both the pandemic and climate crises, time is not on our side. The pandemic crisis is short-term and immediate, but while the impacts of climate change are gradual, they are more enduring. Therefore, "an ounce of prevention is worth a pound of cure". We ask you to move ahead with a climate action plan and do what is required to avoid a threat whose scope has no historic parallel; to do not as little, but as much as possible.

¹ 350 Sacramento, ECOS, Sierra Club Sacramento Group, "Mather South MP FEIR: Comments, January 27, 2020

The world is moving in the direction of greener economy, and it would benefit the County's economy to be leaders in such technology development, as part of the Northern California mega-region. The California economy has benefited from being an environmental leader; e.g., California companies sell air pollution control equipment around the world. Green jobs and businesses already comprise an important and growing portion of the county's economy. For example, we are taking advantage of opportunities in autonomous vehicle development and deployment.

In addition, we note the recently-filed lawsuit regarding the County's approval of development at Mather South. A County CAP would expedite the specific plan process for developers, and for County staff.

Sacramento County is particularly at risk from climate change. Nationally, the Sacramento area vies with New Orleans for being the metropolitan area most at risk of catastrophic flooding. Close to half our water supply comes from the Sierra snowpack, which will decline dramatically: historically, peak snowpack has been April 1; in 20 years, it is projected to be March 1. Later this century, average summer temperatures will be similar to those of Phoenix now. Wildfires and their smoke impacts will become more common. Sea-level rise and increased frequency of atmospheric rivers threatens our delta levees. All these factors threaten our health and economy.

The County will need to become fully engaged in confronting the threat of climate change, and we believe it would be beneficial to start now. More specific reference to the elements we believe essential in the County's CAP, and to the County's previous greenhouse-gas commitments are attached.

Our organizations are committed to working with you to help meet the challenges.

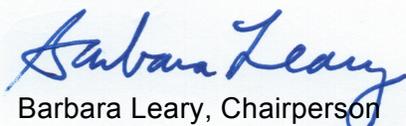
Sincerely,



Laurie Litman, President
350 Sacramento



Ralph Propper, President
Environmental Council of Sacramento



Barbara Leary, Chairperson
Sacramento Group, Sierra Club

cc: Nav Gil, County Executive
Leighann Moffit, Planning Director

SACRAMENTO CAP: NEEDED ELEMENTS

Pursuant to the County's outstanding GP/FEIR GHG commitments (summarized below); the need for a durable, effective response to the threat of climate change; and the desirability of an equitable and predictable planning/development process, we believe:

1. **CAP Scope.** The CAP should:

- a. be adequately funded and promptly initiated;
- b. be communitywide, programmatic, comprehensive, and otherwise consistent with CEQA's provisions for "a plan to reduce greenhouse gas emissions";
- c. focus on the County's existing and projected major emission sectors: on-road transportation, new development, and existing housing stock;
- d. provide permit streamlining as a CEQA-compliant programmatic plan from which future EIRs may be tiered;
- e. provide a "level playing field" for GHG-reduction for all future projects;
- f. be developed with collaborative stakeholder input;
- g. address climate equity issues;
- h. include a plan for climate change adaptation;
- i. include a regional perspective, because sectors such as transportation are best addressed at the city/County level; and because temperature-reduction measures such as cool roofs, high-albedo pavement, and tree canopy cover are increasingly effective when applied over larger areas; and
- j. Include update of the Phase 2A County Operations CAP.

2. **GHG Inventory.**

The County's base-year 2015 Inventory should be updated as soon as possible using currently available contract funds.

3. **Planning Process.**

- a. Consistent with GP Policy LU-115, Implementation Measure I, the County should establish a staff position to oversee CAP planning and implementation.
- b. Consolidating CAP development with other planning efforts, e.g., GP updates, should not blur focus on the CAP and its particular legal requirements, or delay CAP work.

SUMMARY OF UNMET SACRAMENTO COUNTY GHG COMMITMENTS
(General Plan FEIR Mitigation Measure CC-1; General Plan Policy LU-115)

- Provide triennial GHG inventory updates
- Adopt a Green Building Program by 2012
- Enact a Climate Change Program that includes:
 - A fee on development to support a Climate Action Plan
 - Reduction targets that apply to new development
 - A discussion of the 2020 reduction target
- Adopt a Phase 2 Communitywide CAP by 2012 that includes:
 - Economic analysis
 - Detailed programs
 - Detailed performance measures
 - Timelines
 - GHG-reductions expected from each measure.