



May 12, 2020

Leighann Moffitt, Director
Office of Planning and Environmental Review
Sacramento County Building
827 7th Street
Sacramento, CA 95814

Via Email

Dear Ms. Moffitt,

COUNTY CLIMATE ACTION PLAN: FUNDING

We are gratified that on April 7, the Board of Supervisors directed staff to proceed with work on the County's Climate Action Plan (CAP). However, we are concerned that the fiscal impact of the Covid-19 pandemic could make it difficult to include the CAP work, of approximately \$300,000 disbursed over two fiscal years, in the County's FY 20-21 budget.

CEQA requires the County to analyze and mitigate potential greenhouse gas (GHG) impacts resulting from its actions. Project applicants typically reimburse the County for its CEQA-related costs; for example, on March 24, the County approved a \$1.8M agreement providing funding for the Grandpark Project's CEQA development.

Although CAPs are programmatic rather than project-specific CEQA documents, we suggest that, if necessitated by the County's budget exigencies, project applicants could reimburse public costs for CAP work. Absent a CAP, project applicants would need to fund GHG analysis and mitigation as part of project-specific CEQA compliance; and adopting a CEQA-compliant CAP would save applicants time and money by streamlining subsequent GHG analyses.

Also, County General Plan Policy LU-115 directs the County to develop stable CAP funding and identifies project applicants as the likely funding source:

"Enact and fund ... preparation of the second-phase Climate Action Plan ... GHG emissions inventory, and future updates.... The County shall develop sustainable funding ... which may include a fee assessed for development projects".

Developing and updating the CAP and GHG Inventory, and managing the required mitigation monitoring and reporting program, will create new staff workload. Therefore, we suggest that in addition to consultant services, funding include staff resources to adequately administer the County's CAP program.

350 SACRAMENTO, Suite 116 - info@350sacramento.org - PO Box 16167, Sacramento, CA 95816
ENVIRONMENTAL COUNCIL OF SACRAMENTO, Suite 201 - office@ecosacramento.net - P.O. Box 1526, Sacramento, CA 95812
SIERRA CLUB, SACRAMENTO GROUP, Suite 202 - sacramentosierraclub@gmail.com

We therefore propose that consistent with project-specific CEQA funding practice and General Plan direction, the Office of Planning and Environmental Review ask the Board of Supervisors for authority to assess project applicants for expenses involved with developing, updating, and administering the County's CAP and GHG Inventory.

Per discussion with staff, we understand the County intends to involve stakeholders, including our organizations, in a collaborative process to help shape the CAP. We expect this process will facilitate even-handed dialogue in which the views of all stakeholders will hold equal weight, and we look forward to working with staff and other community members in this important effort.

Thank you for considering our comments. Please keep us apprised of budgeting determinations. We look forward to the CAP's inclusion in the draft FY 20-21 budget. Please let us know if we can help in any way.

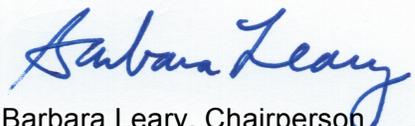
Sincerely,



Laurie Litman, President
350 Sacramento



Ralph Propper, President
Environmental Council of Sacramento



Barbara Leary, Chairperson
Sacramento Group, Sierra Club

cc: 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

Nav Gill, County Executive