



ECOS

ENVIRONMENTAL
♦ COUNCIL ♦
OF SACRAMENTO

Post Office Box 1526 | Sacramento, CA 95812-1526

September 1, 2020

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

Sent via email

Re: Comments -- NewBridge Specific Plan, FEIR dated Aug. 21, 2020

Dear Supervisors,

This comment is submitted on behalf of the Environmental Council of Sacramento (ECOS) on the NewBridge Specific Plan Final Environmental Impact Report (Control No. PLNP2010-00081.) ECOS is a coalition of environmental and civic organizations with a combined membership of more than 52,000 citizens throughout the Sacramento Region. Our mission is to achieve regional and community sustainability and a healthy environment.

ECOS supports the preservation of natural resources. It supports legislation, policies, and projects that help to reduce greenhouse gas emissions, implement smart urban development patterns, increase affordable housing, and enhance the social and economic health of our region's communities.

CONSISTENCY: The Jackson Corridor projects should be treated consistently in terms of the County's requirements for project approval. The requirement to meet state mandated GHG emissions reductions targets is a particularly important one. Mather South demonstrated that it met state mandated GHG emissions reductions targets in the Climate Change chapter of its Specific Plan/FEIR. By contrast, the NewBridge FEIR currently calls for a demonstration of adequate emission reductions at the time of tentative map approval.

Close scrutiny of the project by the public and yourselves as County leaders occurs at FEIR approval. We ask that the NewBridge FEIR be modified prior to your approval to ensure GHG thresholds are met and the project's impact is reduced to a "less than significant level."

Mather South's FEIR, CC-2 measures (GHG-reducing measures) are named and quantified: EV Charging and 100 Percent Solar on All Nonresidential Buildings and Residential Buildings. In addition, the CC-3 measure for purchase of carbon offsets is described and quantified. The NewBridge FEIR simply lists the CC-2 measures as a menu to be selected at tentative map approval. No quantification is provided. A demonstration that GHG thresholds are met is not provided.

For reference, please see this excerpt from the Mather South FEIR, page 7-29:

"Implementation of Mitigation Measure CC-1 requires the project to comply with all provisions included in the AQMP. This mitigation would be consistent with provisions of General Plan Policy AQ-4. Implementation of Mitigation Measure CC-2 would further reduce GHG emissions associated with residential and nonresidential building energy and transportation. However, GHG emissions would not be mitigated to a less-than significant level through the provisions of the

AQMP and Mitigation Measure CC-2 alone. Thus, the purchase of carbon offsets as discussed in Mitigation Measure CC-3 would reduce the transportation-related GHG emissions to reduce mass emissions by 301 MTCO₂e/year for the transportation sector by 2032. With implementation of Mitigation Measure CC-3, all GHG thresholds would be met and this impact would be reduced to a less-than-significant level. [Mather South Final EIR, page 7-29, PLNP2013-00065]

Thank you for your consideration.

With kind regards,

A handwritten signature in cursive script that reads "Ralph Propper".

Ralph Propper
President, ECOS