



ECOS

ENVIRONMENTAL
♦ COUNCIL ♦
OF SACRAMENTO

Post Office Box 1526 | Sacramento, CA 95812-1526

January 19, 2021

Todd Smith, Principal Planner
Sacramento County
Planning and Environmental Review

Via Email

SUBJECT: Administrative Draft of the Sacramento County Communitywide Climate Action Plan

Dear Todd,

Thank you for the opportunity to comment on the subject document, and for your consideration of our comments below.

Sincerely,

A handwritten signature in black ink that reads "Ralph Propper". The signature is written in a cursive, flowing style.

Ralph Propper, President
Environmental Council of Sacramento

cc: John Lundgren, Oscar Balaguer, Susan Herre

Chapter 1

1) CLIMATE EMERGENCY DECLARATION

Up front, the Communitywide Climate Action Plan (CAP) should explain that its goal is to achieve carbon neutrality by 2030. It should explain:

- The County's Climate Emergency Declaration (CED) calls for the "County's approach to reduce greenhouse gas emissions in order to achieve carbon neutrality by 2030" and that this is a more aggressive target than California SB32's goal of reducing GHG emissions by 40 percent below the 1990 level by the year 2030;
- The CAP is the County's overarching guide to mobilize private and public resources to meet the climate emergency;
- The CED calls for urgent action. The CAP should include a schedule for its actions, with an emphasis on sooner rather than later. The CAP should include a prioritization of actions through which the County can make a difference; i.e., actions that require the County's leadership and resources.

2) LAND USE

Sacramento County, as a major component of its greenhouse gas (GHG) emissions reduction measures, should commit to prioritizing and accelerating infill development in transit priority areas, designated-Green Zones, and in the County's Commercial Corridors.

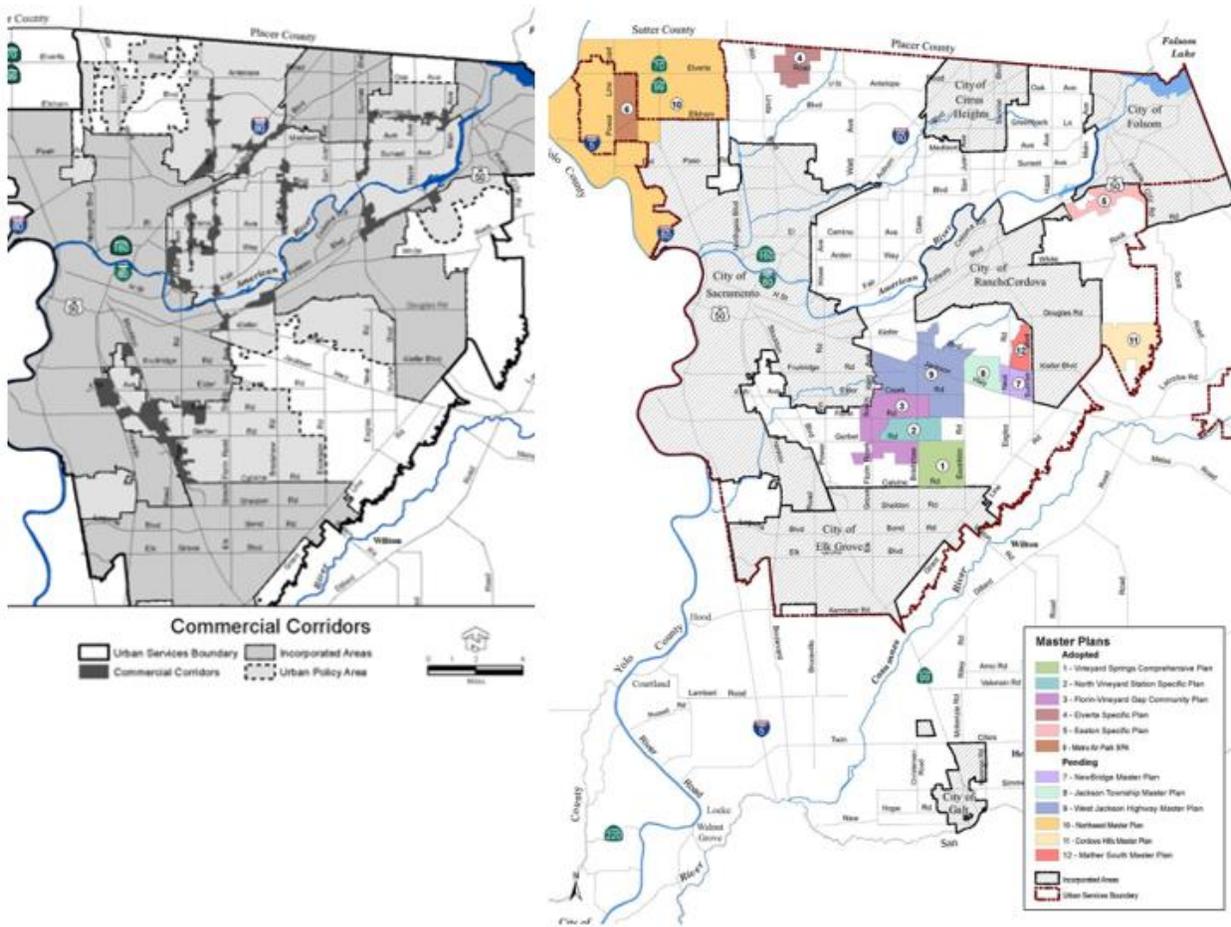
Recommended Language:

Given the legislative and policy background provided below, and the support for GHG emissions-reducing land use patterns found in both the County's General Plan and SACOG's MTP/SCS, and the urgent action called for by the County's Climate Emergency Declaration, the CAP should include language similar to the following:

Between now and 2030, the County will focus its limited development resources on infill housing and mixed-use development in designated Commercial Corridors, transit-priority areas, and Green Means Go zones. This development is broadly characterized as three- to ten-story housing and mixed-use structures in transit-served areas.

This approach is consistent with the Sacramento County General Plan 2005-2030: ¹

- It requires less energy to build and to operate than, for example, the new communities of predominantly single-family homes, shown as “Pending Master Plans” at right below;
- It requires less County public facilities such as water, sewer, energy, schools, libraries, fire protection and emergency response;
- It is consistent with the County’s overarching mission to address long-term sustainability -- economic vitality, fiscal stability, and environmental stewardship;
- It is consistent with the second key focus of the General Plan: to revitalize existing mature communities;
- It is consistent with SACOG’s MTP/SCS.



¹ Sacramento County General Plan 2005-2030 Executive Summary, pg. 2-3, <https://planning.sacounty.net/PlansandProjectsIn-Progress/Documents/General%20Plan%202030/2030%20General%20Plan%20Exec%20Summary.pdf>

Legislative and Policy Background:

SACOG calls upon Sacramento County (and the other five counties in the Sacramento region) to do their part to lower GHG emissions “by accelerating infill development, reducing vehicle trips, and electrifying remaining trips.”²

The critical role of land use patterns in GHG emissions reduction was recognized in 2008 in the California law, *SB 375, Transportation planning: travel demand models: sustainable communities strategy: environmental review*:

“SECTION 1.(c) Greenhouse gas emissions from automobiles and light trucks can be substantially reduced by new vehicle technology and by the increased use of low carbon fuel. However, even taking these measures into account, it will be necessary to achieve significant additional greenhouse gas reductions from changed land use patterns and improved transportation. Without improved land use and transportation policy, California will not be able to achieve the goals of AB 32.”

Sacramento County must measure its performance against the reduction target set by the California Air Resources Board (CARB) for the SACOG region; i.e., a 19 percent reduction by 2035. (This percent change is in *per capita* passenger vehicle GHG emissions relative to 2005.) CARB refers to SB 375 requirements and the expectations for significant reductions from “changed land use patterns and improved transportation”:

“Senate Bill 375 requires CARB to develop and set regional targets for greenhouse gas (GHG) emission reductions from passenger vehicles. CARB has set regional targets, indexed to years 2020 and 2035, to help achieve significant additional GHG emission reductions from changed land use patterns and improved transportation in support of the State's climate goals, as well as in support of statewide public health and air quality objectives.”³

CARB and SACOG see the extreme difficulty for the Sacramento region to achieve the target of 19 percent reduction by 2035. SACOG states:

“The Sacramento region faces unique challenges due to its composition of urban, suburban, and rural development. These unique challenges were recognized. . .”⁴

SACOG developed the Green Means Go program as a way to demonstrate that it can meet the 19 percent reduction target set by CARB if certain actions are accelerated – namely,

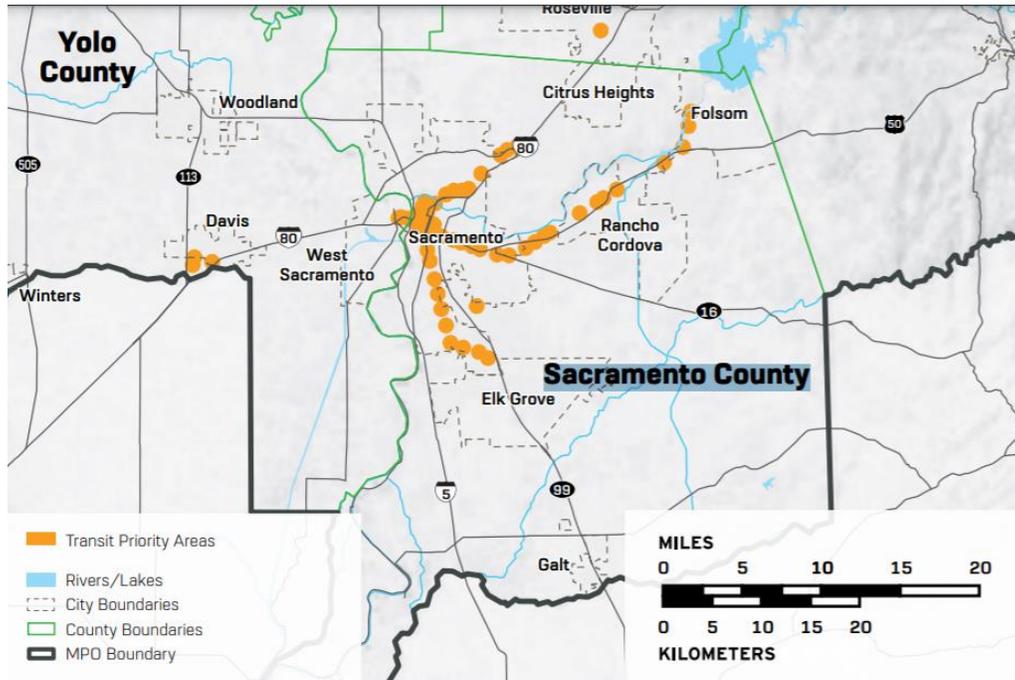
² Greenhouse Gas Reductions and Economic Development, <https://www.sacog.org/post/background>, accessed 12/31/20

³ <https://ww2.arb.ca.gov/our-work/programs/sustainable-communities-program/regional-plan-targets>

⁴ Greenhouse Gas Reductions and Economic Development, <https://www.sacog.org/post/background>

proceed with infill development - which will reduce vehicle trips, and proceed to electrify the remaining trips. SACOG has set a challenge:

“SACOG’s current MTP/SCS sets a goal of having 1/3 of all homes and 1/2 of all jobs in a transit priority area.”⁵



SB375 Transit Priority Project Areas -- SACOG Adopted 2020 MTP/SCS.⁶

Chapters 3 and 4

- 1) The CAP’s measures should include a new category of mitigation measures focused on smart growth, infill housing and mixed-use development in transit priority areas, commercial corridors;
- 2) The measures should be organized by sector. Otherwise, provide a crosswalk from the current organization to the various sectors.
- 3) The measures should be prioritized, include basic steps required for implementation, and they should be scheduled between now and 2030.

What are priorities? Assuming that all parts of the plan are unlikely to progress at the same rate given human, monetary, and other resources, will greater effort be expended on certain segments than on others? Where can the biggest successes be

⁵ Greenhouse Gas Reductions and Economic Development, <https://www.sacog.org/post/background>

⁶ https://www.sacog.org/sites/main/files/file-attachments/2020_mtp-scs.pdf?1580330993

achieved at the most rapid rate? Where is the “low hanging fruit”? Describe it as such.

- 4) An estimate of cost to implement the climate action plan should be included. The staffing and funding referenced in the Climate Emergency Declaration should be described and committed.
- 5) The extent that Sacramento Municipal Utility District’s 2030 carbon reduction goal is factored into the Sacramento County CAP GHG emissions reduction estimates should be spelled out.
- 6) The assumptions and methodologies behind the estimates of GHG emissions reductions should be explained. Take Figure 4-1 GHG Reductions with Municipal CAP Measures Relative to Scoping Plan Target and BAU GHG Emissions, for example:
 - a) The data provided in Figure 4-1 are useful, but would be more powerful and easier to understand if the subtotals for each section were provided along with total figures for the seven segments.
 - b) It appears that the two widest bands, those related to Vehicle Fleet and Employee Commute narrow only slightly (if at all) during the period of the County Climate Action Plan. Is this true?
 - c) Commuters are certainly difficult to control, but why don’t emissions related to the Fleet experience decrease more like that registered for Buildings and Facilities?
 - d) Sometimes the reduction potentials are quantified in the separate sections; other times they are not. Why?
 - e) For clarification: the yellow dashed line “Total with CAP Measures” *appears to indicate that the Emissions will drop from over 120,000 MT CO₂e in 2020 to less than 60,000 MT CO₂e in 2030? This is impressive. Is it correct?*
 - f) Some parts of the plan fall directly within the County’s ability to make changes (Vehicle Fleet). Others the County can only hope to influence at this time (Employee Commute). Many measures identified associated with the latter are simple including analysis of feedback on the 2010 survey. What does the feedback say?
 - g) EC-2 Transit Subsidy Program. Why isn’t everyone already part of this? Target participation 10% in ten years is a low goal!
 - h) Without buy-in from staff, the Green Building Training and Sustainable Business Training (sections BE-3 and BE-4) are largely useless. Is outreach to staff being done?