



March 23, 2021

County of Sacramento Board of Supervisors
700 H Street, Suite 1450, Sacramento, CA 95814

Phil Serna, District 1
Patrick Kennedy, District 2
Rich Desmond, District 3
Sue Frost, District 4,
Don Nottoli, District 5

Ann Edwards, Interim County Executive
Via Email to Clerk of the Board

Dear Members of the Board,

GP ANNUAL REPORT: COMMENT (MARCH 24 BOARD MEETING, ITEM 6)

350 Sacramento and ECOS are concerned with the threat of climate change to Sacramento County. We have reviewed the County's *General Plan Annual Report for 2020* and have the following greenhouse gas (GHG)-related comments.

General Plan Update

We are glad to see the 2020 *Annual Report* indicates the County has begun to consider the needed major overhaul of the 2030 General Plan. We suggest a horizon year that allows the Climate Action Plans and General Plans of Sacramento County and City to be developed cooperatively.

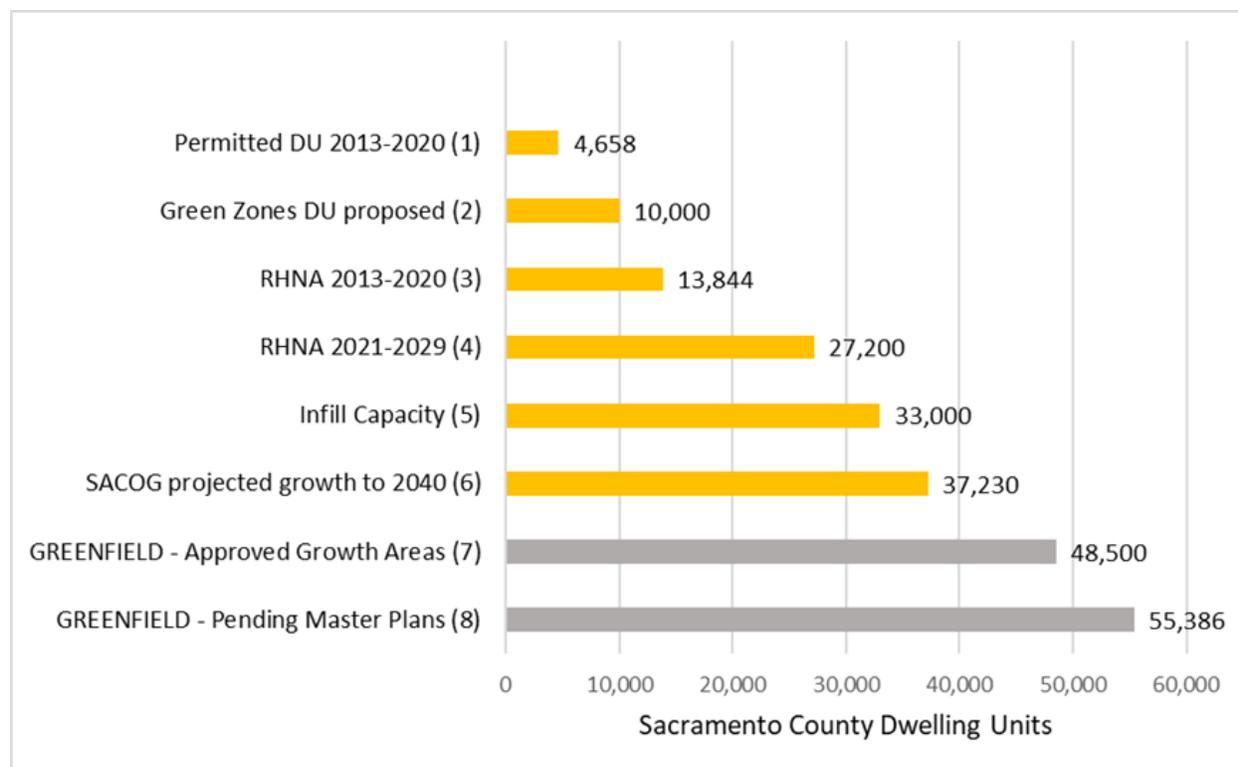
Support for a Formal Infill Program.

The *Annual Report* indicates that 27 measures in the General Plan's Land Use element "...should be part of a formal infill program in order to be fully implemented". We support the proposed infill program. Infill development is critical to address climate change because the County's main source of GHG is passenger vehicle traffic intensified by outlying development.

We note that the County previously adopted an infill program and principles in 2008, and that in 2020 the Board authorized acceptance of a Department of Housing and Community *Local Early Action Planning (LEAP) Grant* which included \$360,000 to develop a comprehensive inventory of infill sites and identify and remove development barriers (the Annual Report indicates this work is in process). Please identify us as interested parties for the project's anticipated stakeholder workshops or other outreach.

Excess Housing Entitlements Would be Environmentally Harmful and Fiscally Inefficient

The below chart displays *Annual Report* and SACOG data relating to the County’s growth planning. Existing infill capacity plus approved and planned dwelling units (DU) would provide 136,920 DU. This number exceeds SACOG’s projected need of 37,230 DU for 2040 by 368 percent. Seventy-six percent of this potential development (103,920 DU) would be in greenfields, although the County’s available infill capacity of 33,000 DU is nearly enough to handle the entire projected need for 2040, and could accommodate SACOG’s entire RHNA allocation of 27,200 DU for this decade.



1	Sacramento County 2030 General Plan 2020 Annual Report, ATT 2 - pg. 3. Annual Housing Element Progress Report, Appendix A, Table B Regional Housing Needs
2	SACOG Green Means Go, Locally Nominated Green Zones, updated 12/4/20
3	SACOG RHNP REGIONAL HOUSING NEEDS PLAN 2013–2021, Executive Summary Table 1 - Allocations - Total and by Income Category, pg. 5
4	SACOG Regional Housing Needs Plan Cycle 6 (2021-2029), Adopted March 2020, pg. ES-3
5	Sacramento County 2030 General Plan 2020 Annual Report, County Growth, Infill, pg. 11
6	SACOG 2020 MTP/SCS, Appendix C: 2020 MTP/SCS Land Use Forecast, pg. 12, Preferred Scenario GROWTH 2016-2040
7	Sacramento County 2030 General Plan 2020 Annual Report, ATT-1, Table 3, Land Use Summary for Approved Growth Areas, pg. 15
8	Sacramento County 2030 General Plan 2020 Annual Report, ATT-1, Table 4 Land Use Summary for Pending Master Plans, pg.15

If the four large greenfield projects now in planning are approved, market limit will allow them, currently entitled projects, and potential infill development to build-out to only 27 percent of capacity, on average. The predictable result will be a pattern of small, low-density greenfield tracts scattered throughout the County.

Such a land use pattern could not be serviced with transit, and would require more energy to build and operate than more compact development; cause increased traffic and GHG emissions; create substantially more environmental impact than the same number of infill DU; make rational infrastructure planning difficult and increase costs; and be more expensive to provide with police, fire, and other County services.

General Plan Policies LU-119 and LU-120 require measures to mitigate the environmental impacts of greenfield development outside the Urban Policy Area. However these measures are limited to the onsite character of a project and do not address the inherent, unavoidable impacts of “leapfrog” development, particularly given the incomplete build-out described above.

Pursuant to the above, we request that environmental documents associated with such developments include cumulative impact analyses to consider impacts to VMT, GHG emissions, habitat integrity, air and water quality, and other potential environmental effects.

Climate Action Plan Needs Stronger Public Involvement

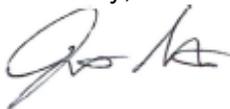
The *Annual Report* discusses public outreach for the CAP. De-carbonizing the economy will require broad public support, and the County’s December 2020 *Climate Emergency Declaration* directs that climate planning involve robust, “unprecedented” public involvement. However, the current CAP process offers substantially *less* opportunity for public involvement than other current County plans, e.g., the *West Arden Arcade Re-envisioning Plan*; the *Active Transportation Plan Update*; and the *Natural Resource Management Plan for the American River Parkway*; and far less than the City of Sacramento is providing for its CAP.

The County made a good start in 2016 and early 2017 with four public CAP workshops. Since then staff has met with stakeholders, and we appreciate having participated in the County’s 2020 Stakeholders’ Group. However, since early 2017 there has been just one County-convened opportunity for the general public to question staff about the CAP, with a three-minute time-limit on input from members of the public due to the number of participants.

The 2016-2017 workshops were more than four years ago. During that time numerous unprecedented and well-publicized climate disasters have occurred, including events directly impacting County residents. Public concern has grown, and we request that the general public be offered further opportunities to learn about the CAP and express its views before formal presentation to decision bodies.

Thank you for the opportunity to present these comments. We look forward to engaging with the Board and County staff as the CAP advances.

Sincerely,



Justin Tweet, Co-Chair



Oscar Balaguer, Co-Chair
350 Sacramento CAP Team



Ralph Propper, President
Environmental Council of Sacramento

cc: Leighann Moffitt, Director
Office of Planning and Environmental Review