



ECOS

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OF SACRAMENTO

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April 9, 2021

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Sent via email to [ClimateActionPlan@saccounty.net](mailto:ClimateActionPlan@saccounty.net) [smithtodd@saccounty.net](mailto:smithtodd@saccounty.net)

RE: Sacramento County Climate Action Plan, March 2021 Public Draft

Dear Todd,

Please see our comments on the subject draft climate action plan. Thank you for your consideration.

Sincerely,

Ralph Propper  
ECOS President

cc:

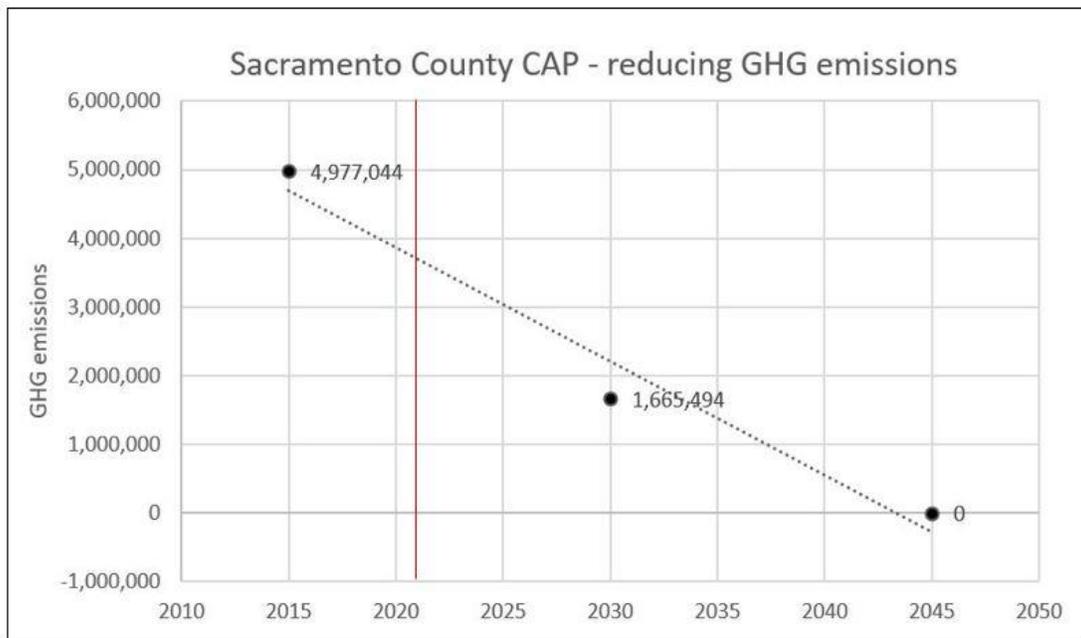
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**1) The CAP needs to demonstrate how the County will reach carbon neutrality.**

The CAP is very optimistic when it shows the County will reduce two-thirds of its emissions by 2030, less than ten years from now.

While 2015 is the starting point in the graph, it represents the date of the emissions inventory. The starting point for action under the CAP is 2021, indicated by the red vertical line, leaving nine years to achieve a dramatic reduction. The point at 1,665,494 represents the target emissions to be achieved by 2030. In 2045, fifteen years later, the point at 0 represents California’s goal of carbon neutrality.

EXHIBIT 1



If emissions do drop from 4.977M to 1.665M MTCO2e by 2030 because of legislation or regional policies<sup>1</sup>, SMUD’s achievement of zero-carbon electricity generation, and successful implementation of CAP measures, the hardest part is still ahead – the last third of emissions.

The CAP should include contingency plans so that if one or more sources of GHG emissions reduction do not work out, other sources are ready to be implemented. For example, if SMUD achieves only half of its target reduction, the CAP should explain how the County will make up for the other half. <sup>2</sup>

<sup>1</sup> CAP Chapter 1 “Table 2 Legislation . . .” should include SB375; SB743; EO B-55-18 establishing 2045 carbon neutral goal;

<sup>2</sup> Where in the CAP is supporting information provided for the .853M MTCO2e estimate of reductions for SMUD?

The information in the table below is from the CAP. It shows the anticipated reduction in emissions, from left to right. In 2030, the remaining emissions are 1.665M MTCO2e.

EXHIBIT 2

Sacramento County CAP: GHG Emissions Reduction 2021 - 2030					
From App. E, Table E-1, E-2		From App. E, Table E-3, E-4		From CAP, Chapter 1, Table 2	From CAP, Chapter 2
2015 GHG Inventory COMMUNITY		2030 GHG Adjusted BAU Forecast COMMUNITY		SMUD	CAP Measures
Residential Energy	1,193,311	Residential Energy	500,099	Zero-carbon electricity generation policy reduce 852,975 by 2030	From Table 1 Community reduce 772,095 by 2030
Commercial Energy	890,603	Commercial Energy	244,903		
Agriculture	254,899	Agriculture	193,373		
High-GWP Gases	251,085	High-GWP Gases	245,175		
Wastewater	27,253	Wastewater	17,139		
Water-Related	15,222	Water-Related	0		
Solid Waste	352,909	Solid Waste	280,694		
On-Road Vehicles	1,671,596	On-Road Vehicles	1,468,071		
Off-Road Vehicles	196,769	Off-Road Vehicles	253,857		
	4,853,647		3,203,311		
2015 GHG Inventory GOV OPS		2030 GHG Adjusted BAU Forecast GOV OPS			
Buildings, Facilities	28,247	Buildings, Facilities	23,736		From Table 5 Gov Ops reduce 21,040 by 2030
Airports	18,310	Airports	15,920		
Wastewater	565	Wastewater	597		
Water-Related	4,665	Water-Related	3,498		
Streetlights, Traffic Sig	3,729	Streetlights, Traffic Sig	2,796		
Employee Commute	38,290	Employee Commute	31,818		
Vehicle Fleet	29,591	Vehicle Fleet	30,808		
	123,397		109,173		
<b>TOTAL REMAINING</b>	<b>4,977,044</b>		<b>3,312,484</b>		

a) Risk Mitigation – Have possible actions ready to be implemented

If some GHG reductions sources fail to come to fruition, instead of going directly to carbon offsets, as described in Section 2.3, the CAP should identify and prepare for substitute actions. Some possibilities are shown below. The CAP should include a risk mitigation plan.

EXHIBIT 3

CAP Chapter 2 Measures	Actions that could be taken:	GHG reductions	Sector
GHG-01: Carbon Farming	Put an additional 200,000 acres into carbon farming. <sup>3</sup>	.378M	Agriculture
GHG-04: Energy Effic., Electrification of Existing Nonres. Buildings	Accelerate the retrofit of 75% existing non-residential buildings instead of 25%. <sup>4</sup>	.032M	Energy - Commercial
GHG-06: Energy Effic., Electrification of Existing Resident'l Buildings	Accelerate the retrofit of 75% of existing residential buildings instead of 25%.	.354M	Building Energy
GHG-10: Electric Vehicle Infrastructure Program	Implement an additional 1,170 chargers.	.104M	On-Road Vehicles

<sup>3</sup> How much acreage in the County can do Carbon Farming? Can the County require these practices?

<sup>4</sup> The emission reductions from nonresidential buildings seem small. Please explain.

**b) Risk Mitigation – The planning work must start earlier**

Each planning activity listed below is taken from the GHG reduction measures in the CAP and is therefore necessary for the GHG reduction to occur. Altogether, this is a lot of planning work. This should be done as soon as possible to enable the GHG reductions to begin. The CAP includes a completion date for some activities but not for all.

The County needs to accelerate the planning work, to achieve completion of all the amendments, changes, updates, and developments by December 2022. This will require additional planning staff.

**EXHIBIT 4**

<b>Measures that require Planning Work to start GHG reductions</b>	
<b>No.</b>	<b>GHG Measure</b>
7	Energy Code - Reach Code for New Residential Buildings
11	VMT Mitigation Program
12	Zoning Code to include a TSM Plan
13	Zoning Code to modify Parking Standards
14	Plan transit connections, coordinate with SacRT
15	Pedestrian Master Plan or Active Transportation Plan
15	Pedestrian Capital Improvement Program
15	Complete Streets Policy
16	Development Standards for new and existing Roadways to include Traffic Calming
17	Zoning Code to ensure preferred siting of employee bike parking and encourage bike use
18	County’s Federal/State Legislative Priorities document to encourage fuel-efficient vehicles
19	Building Code - Require Electric Vehicle Charging infrastructure (EVSE)
19	Development Standards for Electric Vehicle charging infrastructure
20	Active Transportation Plan to add Safe Routes to School and related capital improvements
21	Community Plans and Corridor Plans in urban areas to support infill and TOD
22	GIS-based scoring system to screen new development for access to destinations
23	Set up account to facilitate infill dev w/fees on DU in Approved & Pending Master Plans

**2) The CAP should address capacity building**

**a) Hire more planning staff**

The CAP should call for the hiring of more staff to complete as soon as possible the planning activities listed above. The planning work enables GHG-reducing follow-on activities, including the design and construction of many capital improvements. A building boom is needed to achieve the GHG reductions called for by 2030. Federal funding may become available to help build the infrastructure, and the County should be ready by having the planning work complete.

**b) Set up a climate team to coordinate the County’s efforts**

In Chapter 4 Implementation, the CAP mentions the Climate Emergency Mobilization Task Force and calls for coordination with it. The CAP needs to go much further: it should call for and describe this climate team, its composition, and roles, responsibilities, and authority, so that the team can be engaged and go into action immediately following the Board of Supervisors’ approval of the CAP.

### 3) The CAP should include a financial component

#### a) Alignment of values

To ensure the County's time, effort, and revenue are effective in reducing GHG emissions, the CAP should require a determination of consistency with CAP strategies for the County's planning, capital improvement projects, and operations, as well as for plans and projects proposed by other parties. This is a necessary step. For example:

- SACOG favors grant applications for projects aligned with the MTP/SCS.
- California State Transportation Agency (CalSTA) reviews projects funded with State transportation funds for consistency with its goals.
- Governor Newsom's Executive Order N-19-19 called for the creation of a Climate Investment Framework to leverage state funds to drive investment toward carbon-neutral technologies.<sup>5</sup>
- The 2015 Paris Agreement calls for "Making finance flows consistent with a pathway towards low greenhouse gas emissions and climate-resilient development."<sup>6</sup>

#### b) Funding plan and costs to implement the CAP

The CAP identifies only two fund sources, both from new developments. The revenue from both sources is to be invested into high-density infill projects, per Chapter 4 Implementation, bullet 9.

- In GHG-11, the County plans to charge fees to new developments that do not achieve a 15 percent reduction in daily VMT compared to the regional average. The fees will be collected to offset VMT impacts and put into a County VMT mitigation bank.
- In GHG-23, the County plans to charge \$1000 for each dwelling unit in the Approved or Pending Master Plans listed in Measure CHC-23 Incentivize Infill Development, Table 4, page 19.

Although we want funds to go toward infill development, it is disheartening to see the arrangement laid out in the County's CAP, in which less VMT- and GHG-producing infill development is dependent upon the successful implementation of more VMT- and GHG-producing greenfield development, namely the Approved and Pending Master Plans. The County should review its budget and reprioritize and reorganize its revenue and funding methods to ensure achievement of the CAP's emission reduction goals, especially because the fate of Pending Master Plans cannot be assured.

Regarding the cost to implement the CAP, the qualitative cost analysis in Appendix G gives us a rough idea of the County's administrative costs. The CAP should develop an order-of-magnitude cost estimate with a breakdown that includes administrative and professional; operations; and capital costs for both County and Others. Based on this cost estimate, the CAP should develop a funding plan. Both the cost estimate and funding plan should be included in the CAP document and be part of what is approved by the Board of Supervisors. Without these, the CAP will not be able to achieve its goals.

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<sup>5</sup> <https://www.gov.ca.gov/2019/09/20/ahead-of-climate-week-governor-newsom-announces-executive-action-to-leverage-states-700-billion-pension-investments-transportation-systems-and-purchasing-power-to-strengthen-climate-resili/>

<sup>6</sup> [https://unfccc.int/sites/default/files/english\\_paris\\_agreement.pdf](https://unfccc.int/sites/default/files/english_paris_agreement.pdf) Article 2, Para.1(c)

**4) The CAP should strengthen transportation as a strategy, especially the On-Road Vehicle Sector.**

The 2030 forecasted GHG reductions in the On-Road Vehicle Sector are relatively modest, given that this sector contributes over a third of GHG emissions in the County (see GHG Inventory in Exhibit 2 above.) The combined Adjusted BAU and GHG Reduction Measures reduce this Sector by only 17 percent.

EXHIBIT 5

On-Road Vehicle Sector			
Percent Reduction	Total GHG emissions	Reduction in GHG emissions	Source
	1,671,596		2015 Inventory
12%	1,468,071	203,525	2030 Adjusted BAU forecast
17%	1,386,444	81,627	2030 Community GHG Reduction Measures

The County should take the following actions to increase GHG emission reductions.

**a) Accelerate the planning work.**

Almost all of the measures in the On-Road Vehicle Sector require planning work before the reductions can begin, so the planning work must be completed as soon as possible. Refer to Para. 1b and 2a above for more information.

**b) Install more EV chargers. Measure GHG-10 Electric Vehicle Infrastructure.**

At 34,867 MTCO<sub>2</sub>e/year, this measure reduces more than any other On-Road measure. Is the number of installed chargers, 390, based on assumed EV demand or on available resources? The CAP should explain how this number can be increased.

**c) Make increasing transit ridership one of the County’s first priorities.**

Improved Transit Access (Measure GHG-14) is essential to reducing on-road vehicles. The CAP should provide specific progress benchmarks for this measure and explain how this measure can be substantially strengthened.

## 5) The CAP should treat *Compact Land Use Development around Transit (Infill Zones)* as a strategy.

### a) The Rationale

Due to the region's growth pressures, a majority of people in the County are unlikely to be able to live in single-family neighborhoods, but in multi-unit housing that is convenient to transit and work sites.

This shift to more a more compact, walkable development pattern, has been promoted for over twenty years by the California legislature and governors, and by regional governments such as SACOG, in order to reduce GHG emissions per capita, reduce VMT per capita, increase housing affordability, increase access and equity of access to destinations and services, improve the quality of public spaces, improve public health, protect open space, and reduce energy consumption during construction and during operations. The idea is to build more sustainable communities.

“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. Metropolitan planning organizations (MPOs) must prepare a sustainable communities strategy (SCS) that will reduce GHG emissions to achieve these regional targets, if feasible to do so.”<sup>7</sup>

In a paragraph on Cross-Sector Interactions, CARB's Scoping Plan states: “more compact development patterns reduce per capita energy demands, while less-compact sprawl increases them.”<sup>8</sup>

This development pattern deserves to be its own strategy in the CAP. By giving it a platform in the CAP, the County would be taking a stand against the GHG-generating impacts of sprawl.

The strategy itself: Reduce emissions-generating sprawl-type land use patterns by promoting and investing in infill zones. These zones will have infill housing and three- to ten-story mixed-use developments located in established communities and along commercial corridors. This compact development will bring together retail, work sites, and residences, around transit stations and along walkable, bikeable streets served by bus transit. Lower density development just beyond the infill zones will enjoy easy access to populated public spaces, shops, and transit.

### b) Suggested names for this strategy

The strategy could have a name similar to one of the two transportation strategies in the CAP – it could be called *Reduced Land Consumption for Development and Alternative Land Use Patterns* -- but *Compact Land Use Development around Transit/Infill Zones* seems more positive.

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<sup>7</sup> <https://ww2.rb.ca.gov/our-work/programs/sustainable-communities-program/regional-plan-targets#:~:text=CARB%20has%20set%20regional%20targets,health%20and%20air%20quality%20objectives>

<sup>8</sup> [https://ww2.arb.ca.gov/sites/default/files/classic/cc/scopingplan/scoping\\_plan\\_2017.pdf](https://ww2.arb.ca.gov/sites/default/files/classic/cc/scopingplan/scoping_plan_2017.pdf), pg 67

**c) Other jurisdictions have a strategy for this**

San Francisco’s draft Climate Action Plan has both a Transportation/Land Use Strategy and a Housing Strategy.<sup>9</sup> Below is TLU 6: Increase density, diversity of land uses, and location efficiency

**TLU 6: Increase density, diversity of land uses, and location efficiency across San Francisco.**

Supporting Actions

- TLU 6-1: By 2023, re-zone to allow for multi-family housing throughout San Francisco.
- TLU 6-2: By 2023, increase the types of home-based businesses allowed in residential districts to reduce commute trips and provide more flexibility in how space can be used by San Franciscans.

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- TLU 6-3: Create an interagency working group or division to facilitate the development of neighborhoods where people live within an easy walk or roll of their daily needs (e.g., parks, retail goods, services).
- TLU 6-4: Every five years, identify and reimagine under-utilized publicly owned land and roadways that could be transformed or repurposed.
- TLU 6-5: Design public space and the transportation system (including roadways) to advance racial and social equity by co-developing public spaces with BIPOC community members and understanding their needs before designing the space.

**d) GHG Reduction Measures would change if this strategy were added**

The GHG reductions from compact development patterns are varied, such that multiple sectors are needed to account for them – Agriculture, Energy Residential, Energy Commercial, and On-Road Vehicles.

Among others, Measure GHG-23 Incentivize Infill Development would change. It would actually describe steps the County would take to incentivize infill development and set benchmarks/target indicators to show progress. Because the County has identified infill capacity for 33,000 dwelling units, the CAP should set a target of at least 10,000 dwelling units (DU) in Infill Zones by 2030, another 10,000 DU by 2040, and another 10,000 DU by 2050. This would not fulfill the County’s Regional Housing Needs Allocation of 21,272 for 2021-2029, but it would be a good start.

Measures would also describe the reduced energy used to manufacture the fewer materials required by multi-unit dwellings, and the reduced energy used by residents to operate their dwelling unit.

<sup>9</sup> <https://sfclimateaction.konveio.com/>

e) **Examples should be given.**

The County's identification of Green Zones for SACOG's Green Means Go initiative is a good start. The County recently proposed 10,000 dwelling units for five of the six the highlighted infill areas on the map.

