



Post Office Box 1526 | Sacramento, CA 95812-1526

October 8, 2021

Todd Smith, Principal Planner
Office of Planning and Environmental Review County of Sacramento
700 H Street, Suite 1450, Sacramento, CA 95814

Sent via email to ClimateActionPlan@saccounty.net smithtodd@saccounty.net

RE: Sacramento County Climate Action Plan, Final Draft, September 2021, referred to as "CAP"

Dear Todd,

Thank you for the opportunity to comment. Please consider our comments on the following pages.

Sincerely,

A handwritten signature in cursive script that reads "Ralph Propper". The signature is written in black ink on a light-colored, textured background.

Ralph Propper,
ECOS President

cc: Board of Supervisors via email to BoardClerk@saccounty.net
Ann Edwards, Interim County Executive CountyExecutive@saccounty.net
Leighann Moffitt, Planning Director moffittl@saccounty.net
John Lundgren, Senior Planner lundgrenj@saccounty.net

1) Overview

Having participated on the County's climate action plan (CAP) stakeholder group process since July of 2020 and having commented on CAP drafts in January and April 2021, we hoped the Final Draft, released a month ago, would not disappoint. However, it is disappointing. Here's why:

- The CAP doesn't take on the whole project, that is, getting from 5 million metric tons of carbon dioxide equivalent emissions per year (MTCO₂e) to carbon neutrality. Instead it concentrates on the nine years between now to 2030, and over-optimistically depends on reductions from State legislation and regional policies.
- The CAP does not have a transit-oriented infill development strategy, despite the fact that for nearly twenty years, State law has called for the integration of regional land use, housing, transportation, and climate change planning in long range transportation plans in a Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS), as a means to achieve greenhouse gas (GHG) reduction targets, among other benefits.
- The CAP amazingly sets up implementation of large agriculture/ranchland master plan projects as the way to generate funding for infill development, under the heading "GHG-23: Incentivize Infill Development." Transit-oriented infill development should be among the top three or four strategies in the CAP, and not made dependent upon climate-busting sprawl master plan projects.
- Many CAP measures are undetailed and/or unenforceable.
- In the CAP's Appendix F, however, there appears to be an attempt to reckon with the whole challenge. Appendix F strategies, and others, need to be incorporated into the CAP body.

We suggest the CAP be modified. We believe it is counterproductive and unreasonably restrictive to base a climate action plan today on old information and assumptions. Climate scientists have determined that the effects of climate change are happening much faster than expected in 2010/11, when the General Plan EIR was adopted. Therefore:

- The modified CAP should include strategies and measures that may indeed *"entail changes to the underlying assumptions used to prepare the CAP, such as modified land uses or setting targets for GHG reduction that were not identified as part of the Phase 1 Strategy and Framework document and General Plan [environmental impact report] EIR mitigation which served as the basis for preparing this Phase 2 CAP."*¹
- The modified CAP should incorporate Appendix F strategies, as well as the land use development strategy described below to prioritize infill development and accelerate GHG emissions reductions particularly in the transportation sector.
- For the modified CAP, a California Environmental Quality Act (CEQA) compliant environmental document should be developed so that it provides the public and decisionmakers with adequate information and analyses.

¹ Section F.1, Appendix F, Sacramento County Climate Action Plan, Final Draft Sept 2021

2) How much does the CAP reduce GHG emissions?

The CAP says the combination of reductions from state legislation/regional policies and Sacramento County GHG reduction measures will put “the County on a path toward meeting a 2030 carbon neutrality goal.”² This is questionable.

Honestly, the numbers are unclear. In the most optimistic scenario, if all reductions are realized, then some amount less than 50 percent of the County’s 5M MTCO_{2e} would be reduced by 2030.³ Emissions continue to grow on the order of 1M by 2030, although the source of growth is not explained. It is not clear the County will be on a path by 2030 but it is certainly true that the harder part will remain to be done.

So that everyone understands the numbers, the CAP should include simple tables like this:

CAP Scenario		M MTCO _{2e}
Starting point	2015 Inventory (Com + Gov)	4.977
Reduction	measure description	x.xxx
Addition	GHG growth / why?	x.xxx
Amount remaining	GHG emissions - Year XXXX	x.xxx

The current CAP amounts to “sticking a toe in the water.” It is a half-hearted attempt that depends on State legislative and regional policies to do the heavy lifting.

Only in Appendix F is there any recognition of the scale of change required. But Appendix F strategies and measures have been excluded because they “entail changes to the underlying assumptions used to prepare the CAP, such as modified land uses or setting targets for GHG reduction . . .”

We suggest the CAP be modified to be a complete, detailed, and realistic plan leading to carbon neutrality. The CAP should incorporate new strategies and measures that aim for carbon neutrality in 2030 and as well, provide for the likelihood of many more years before the goal is reached, because of optimism bias and the complexity and scope of the work.

The CAP should be treated like the megaproject that it is. The County should conduct all-hands-on-deck sessions with staff and the community to let everyone know a new way of working and thinking is required. The work should be divided into phases, with interim milestones, and with real cost estimates, unlike Appendix G. The work should be properly staffed, budgeted, funded, and bolstered with contingency plans.

² Section 1.3 Greenhouse Gas Reduction Targets for 2030

³ Five million (4.977) is the total metric tons of CO₂ emissions produced in the County, based on the 2015 Inventory, the starting point for the CAP.

3) What about transportation and land use?

The CAP inadequately responds to the largest sector of emissions in the County, On-Road Vehicles, at 1.7M of the entire 4.97M MTCO₂e/yr.⁴

Reductions are offset by emissions growth so that after 2030, 88 percent of the emissions from the On-Road Vehicle sector remain to be reduced.

The County’s 2011 document said “in 2005, over 40 percent of GHG emissions came from on-road transportation-related energy use. . .”⁵ Today, 40 percent is still accurate. This is a very difficult problem and a radically different approach to development must be taken to stop the growth in VMT and related GHG emissions.

Sector	2015 Baseline GHG Emissions (MTCO ₂ e/year)	Reductions from Leg or Regional Policies	Reductions from SacCounty Measures	Total Reductions	Percentage Reduced	Balance after reductions	2030 Forecast GHG Emissions (MTCO ₂ e/year)	Amount remaining
On-Road Vehicles	1,671,596	491,758	81,627	573,385	34%	1,098,211	1,468,071	88%

The CAP recognizes that construction of the large master plan projects are “in locations that contribute to increased VMT and associated greenhouse gas emissions.”⁶ And yet, incredibly, the CAP makes infill development dependent upon construction of these master plan projects! This is backward.

Infill development in transit areas are more affordable, more serviced in terms of public and private opportunities for jobs, shopping, community meeting. With transit conveniently nearby, the cost of a car, insurance, maintenance, and parking can be avoided.

The CAP should make transit-oriented development (TOD) one of its top strategies. Here’s how:

- The CAP should identify infill corridors and nodes along major bus routes and at light rail stations. In these areas, the CAP should call for the development of TOD Specific Plans containing zoning for mixed income and mixed use at high densities, and for incentive funding and fee waivers for development projects.
- The CAP should call for the planning, design, and construction of sewer, water, and other utilities, as well as surface improvements in the public right-of-way such as wider sidewalks and bikeways, to be adequate and accommodating of dense infill development. The CAP should apply Measures GHG-12, 13, 14, 15, 16, 17, 19, 20, 21, 22, and 27 only to TOD Specific Plan areas to radically improve the sense of place and community in these areas, and avoid spreading efforts so thin that they are meaningless.
- The CAP should provide funding for transit improvements, better transit facilities, in TOD Specific Plan areas.

⁴ See Section 1.2, Table 1: Sac County GHG emissions by sector; also Table 2; and Section 2 Greenhouse Gas Reduction Strategy

⁵ Climate Action Plan Strategy and Framework Document from Nov. 2011, pg. 3

⁶ See Section 2 Greenhouse Gas Reduction Strategy Measure GHG-23: Incentivize Infill Development

In an Appendix F scenario, the CAP clearly recognizes the key link between large scale master plan projects and GHG emission production, in the action to be taken if emissions do not drop at the anticipated rate: “Issue a moratorium on new building permits . . .”⁷

So, how should the CAP deal with the master plan projects? We suggest it should commit to a strategy of “Slow-Down Greenfield Development and Respect the Habitat.” This strategy would include:

- A commitment to not breach the County’s Urban Services Boundary, based on natural conditions including habitat, watersheds, etc.
- A commitment to not ignore the Natomas Basin Habitat Conservation Plan area for endangered species
- A return to a phased approach, that is, building from the core outward, step by step
- A required demonstration of transit service, of adequate water supply, before consideration of development is made.

⁷ Appendix F, pg F-2