



**ECOS**  
ENVIRONMENTAL  
♦ COUNCIL ♦  
OF SACRAMENTO

Post Office Box 1526 | Sacramento, CA 95812-1526

March 22, 2022

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

Subject: Recommendations to Strengthen the County's Proposed Communitywide Climate Action Plan

Dear Chairperson Nottoli,

The Environmental Council of Sacramento, the Sacramento Valley Chapter of the California Native Plant Society (Sac Valley CNPS), the Sacramento Audubon Society, the Sierra Club Sacramento Group, and the Xerces Society are submitting the following recommendations to strengthen the proposed Communitywide Climate Action Plan (Plan) dated February 2022. Your inclusion of these recommendations into the Plan will increase the County's preparedness to meet the challenges of our changing climate and its impact on the region's water resources and environment. We note that the County is already moving in important directions to conserve water, improve both wild and landscaped areas' ability to adapt to climate change, and implement measures to deal with coming droughts and flood events. The County's implementation of the following recommendations will extend and strengthen already identified Climate Action Plan (CAP) initiatives and result in a more effective Countywide CAP.

The following comments have been organized to track specific areas already identified in the Plan.

## 2.2 Government Operations Greenhouse Gas Reduction Measures

Measure Gov – Water – 01 (page 38) Develop Water Efficiency Policy

This measure establishes a target of 20% water use efficiency improvement in new and existing county buildings when compared to 2015.

Recommendations:

This measure's goal of an improvement of 20% in the County's water use efficiency seems low given the large potential for improved landscape water efficiency within existing and new County buildings and properties. County staff should be asked to increase this goal, possibly even doubling it. We suggest a more aggressive goal be established.

Add a goal that all County properties have low water use landscaping and feature efficient irrigation methods and techniques by 2030.

Ensure that each publicly visited County facility include interpretive signage that conveys the water savings message to the public.

Measure Gov – Water – 02 (page 39) Conduct Turf Landscape Irrigation Audit

Recommendations:

Expand this measure to target the entirety of the County’s landscaping. It should be restated as a County-wide Property Landscape Irrigation Audit and include the following actions:

The initial Audit should identify all essential and nonessential turf. For essential turf, focus on improving watering practices. For nonessential turf, a plan and timetable should be developed to phase it out by 2030. Nonessential turf should be replaced with low water, drought tolerant plants and/or permeable ground covering with an emphasis on local native plants and trees.

The second phase of the Audit should focus on non-turf landscaping and identify landscape areas that include water wasting plantings as well as water system efficiency improvements. The water wasting planting areas should be phased out and replaced by 2030 with low water use, drought tolerant plants with an emphasis on local native plants and trees.

All existing tree plantings should be evaluated for watering efficiency in each phase of the Audit.

All new County building landscaping and any landscape refurbishment should meet the proposed county landscape goal of 100% low water use landscaping (except for essential turf grass). The County should make use of local native plants and trees whenever practical.

Other CAP Water Actions to increase the use of gray and recycled water as well as rain gardens and other mechanisms to encourage storm water capture and infiltration should be incorporated into both existing and new County facilities.

The County should make use of low water use, native plants and trees in transportation corridor medians and curb areas, other transportation and pedestrian right of way landscaping, and parking landscaping. The County should coordinate with the State CNPS’s Plants for Parkways program for information and technical assistance on appropriate native plant selection, landscape design and planting tips, and plant watering and maintenance tips for this region.

The County should work with the Sac Valley CNPS, Xerces Society, and the Sacramento Audubon Society to ensure County personnel are trained on how to select, plant, and care for low water use local native plants.

For purposes of this and all other recommendations regarding the use of low water use, drought tolerant plants and/or permeable ground covering with an emphasis on local native plants and trees, the County should rely upon the State CNPS’s Calscape.org database of low water use local native plants, the Sac Valley CNPS Homegrown Habitat local native plant list, the Sac Tree

foundation's Shady 80 tree list, information from the Xerces Society and the Sacramento Audubon Society, and other sources approved by the County's planning agency.

Public awareness of these landscaping changes and the lists of available and appropriate landscape plants and techniques to ensure they thrive should be incorporated in the County's water efficiency outreach program.

Measure Gov – Water – 03 (page 39) Use Water Efficient Equipment

This measure replaces old or inefficient irrigation systems and equipment with efficient equipment when funds are available from water agencies.

Recommendation:

Given the importance of the water efficiency actions called for in Measures 1 and 2, the County should budget for these items as well as seek grants and funding from water purveyors, the State of California, and the Federal Government.

3.1.2 Prepare for Increased Risk of Wildfire

Measure Fire – 02 (page 48) Coordinate with State and Local Agencies to Establish Ecological Recovery Programs to Return Native Plants to Burned Areas.

Recommendation:

The County should seek the assistance of the signatories of this letter in implementing this measure.

Measure Fire – 03 (page 49) Update Tree Planting Guidelines to Select Wildfire Resistant Species

Recommendation:

The County should seek assistance from CalFire for information on fire resistant plants, as well as the signatories of the letter and the Sac Tree Foundation, in implementing this measure.

3.1.3 Prepare for Increased Drought

Measure Water – 01 (page 50)

Recommendation:

This measure should include the Sacramento Water Forum as a partner agency in determining the Region's water resilience.

Measure Water – 02 (page 51) Increase On-site Grey Water and Rainwater Reuse, Storm Water Reuse, and Recycled Water Systems

Recommendation:

Along with County efforts to voluntarily and otherwise encourage residents and businesses to increase use of on-site grey water and rainwater, storm water, and recycled water systems, the County’s program should incorporate the successful elements of the City of Sacramento’s rainwater catchment program.

Measure Water – 04 (page 52) Reduce Potable Water Use in Outdoor Landscaping

This Action includes changing the County landscape ordinance to require 80% of new landscaping be low water use, drought tolerant plantings for new residential and nonresidential buildings; improving rebate programs for removing turf; and increasing recycled water service for landscaping by 50%. The signatories commend the County for establishing sound, achievable results for new landscaping and water use for its purposes.

Recommendations:

Add to the new landscaping ordinance the requirement that nonessential turf can only be part of the 20% of landscaping that is not low water use and drought tolerant. In addition, the standard should include a preference for the use of low water use, drought tolerant, local native plants and trees, as referenced in our comments on Measure Gov – Water – 02 above.

Establish a Countywide goal and program to work with city governments to establish their own landscaping ordinances which mirror the proposed County landscaping ordinance. In addition, the County should work with cities to adopt the same landscaping protocols and programs recommended above for inclusion in Measures Gov – Water – 01 & 02.

Establish the following goals and program to work with city governments and local water purveyors to eliminate or replace a minimum of 50% of all existing nonessential turf throughout the County with low water use, drought tolerant plants and/or permeable ground cover with an emphasis on local native plants and trees by 2025. Establish a long-term goal to work with city governments and local water purveyors to convert 80% of all outdoor landscaping in the County to low water use, drought tolerant plants and/or permeable ground cover with an emphasis on local native plants and trees by 2030.

Measure Water – 05 (page 53) Expand Upon Existing Water Conservation Education Outreach Programs for Residents and Businesses

Recommendation:

Publish on the County’s web site water use (GPCD) statistics (available from the California Department of Water Resources) for customers of each water purveyor within the County, along with information about water use in other similar climates within the state, to enable area

residents to compare their water use to others in the region and across the state. Information about the County's water use should also be posted. This information will be useful in determining how successful the County's efforts are in reducing its own as well as regional water demand.

Measure Water – 06 (page 53) Collaborate with Federal, State and Local Agencies and Organizations to Identify Future Water Supplies...

Recommendations:

The County should participate with Sacramento Area Flood Control Agency (SAFCA), State Department of Water Resources, the Bureau of Reclamation, the Sacramento Water Forum (WF), Regional Water Authority (RWA), local water agencies and other interested parties in the development of excess storm water recharge projects including Flood-Managed Aquifer Recharge (Flood–MAR).

Identify priority recharge areas within the County, including Paleochannels, and move to zone such properties for that purpose.

Convene discussions with Groundwater Sustainability Agencies (GSA), RWA, SAFCA, WF, conservation landowners, agricultural interests, and others interested in developing and securing multi-benefit projects (including projects that restore native plants and habitats) that can be utilized for groundwater recharge in the three groundwater subbasins. The County should actively participate in the acquisition (purchase, conservation leases, or other means) of viable projects.

#### 3.1.4 Prepare for Increased Flooding

Measure Flood – 01 (page 54) Evaluate and Improve Capacity of Stormwater Infrastructure for High-intensity Rainfall Events

Recommendation:

The County should assume responsibility for the maintenance of culverts currently maintained by property owners where residents experience local flooding.

Measure Flood – 03 (page 55) Identify New Locations for Multi-Benefit Flood Control...

Recommendation:

The County should convene SAFCA, flood control districts, GSAs, agricultural interests, and conservation landowners to discuss and identify priority projects and begin the CEQA process as appropriate. This Measure should be combined with the efforts called for in Measure Water – 06.

Measure Flood – 05 (page 56) Invest in Pervious surfaces ...

Recommendation:

Include the requirement that all infill and redevelopment areas that experience local flooding mitigate for any increase in impermeable surfaces through on-site retention or other methods to attenuate flows.

Measure Flood – 08 (page 57) Work with SAFCA and Local Agencies...

The Flood-MAR concept as currently presented poses some regional issues that require discussion and resolution before substantial progress can be made.

Recommendations:

The County should actively join with SAFCA, RWA, WF, interested water purveyors, and the affected GSAs to identify the issues and their resolution so that an appropriate, protective excess storm water use program can be developed and moved forward.

Either as part of this measure or as part of a separate one, the County should become involved in determining when and how some of the excess storm water from future storm events that moves down the Sacramento River can be diverted either out into the bypass or other diversion points for recharge benefits for this region.

Measure Flood – 11 (page 59) Identify Concrete Channel Restoration Areas

Recommendation:

Include in this measure the expansion of creek corridors by moving levees and floodwalls to increase flood protection and restore native habitat in the expanded corridor.

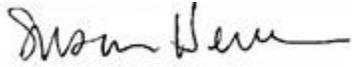
Measure Flood – 12 (page 59) Replant Bare or Disturbed Areas

Recommendation:

The County should seek the assistance from the signatories of this letter when implementing this measure to incorporate native plants that will provide bird and wildlife habitat in replanted areas.

The Communitywide Climate Action Plan moves the County forward in its efforts to adapt to the region's changing climate in the areas we have commented on here. We believe our recommendations will strengthen the measures outlined in the Plan and are consistent with the direction the County is prepared to take. We urge you to include our recommendations when you

adopt the Plan and offer our support and technical expertise to aid the County and its staff in the implementation of the recommendations for which we have expertise.



Susan Herre,  
President  
Environmental Council of Sacramento



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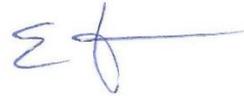
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