



ECOS

ENVIRONMENTAL
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OF SACRAMENTO

Post Office Box 1526 | Sacramento, CA 95812-1526

July 10, 2023

Todd Smith, Planning Director
Planning and Environmental Review
Sacramento County
827 7th Street, Room 225
Sacramento, CA 95814

Subject: Change to Climate Emergency Resolution, #72 Consent Calendar, BOS mtg July 11, 2023; and your email from July 7, 2023: Subject: FW: !!Action Alert!! - Request for clarification

Dear Todd,

In response to your email, we offer the following:

Overview

The County has stated its goal to achieve carbon neutrality by 2030. This is fine.

The Climate Emergency Resolution (CER) says “WHEREAS, the County’s goal is to eliminate greenhouse gas emissions to the greatest extent possible, to remove or sequester greenhouse gases to mitigate any remnant GHG emissions, and ultimately to sequester more GHG than emitted, thereby decreasing atmospheric GHG concentrations to ultimately achieve carbon neutrality by 2030; and, . . .”

The Chatten-Brown letter simply says the CAP should state this goal: “The CAP should set the County’s Carbon Neutrality goal as set forth in the Board of Supervisors’ Climate Emergency Resolution. (Exhibit A.)” [C-B, pg 3]

What the County needs to do now is set forth and commit to a realistic phased approach to the reduction of GHG emissions and the achievement of carbon neutrality. A part of this will be the County’s approach to reducing GHG emissions to achieve carbon neutrality by 2030 - what it can do and what it can’t - after evaluating all resources and emergency actions possible.

This is consistent with the language of the CER: “Where existing funding or resources do not support the level of action required, County staff shall identify gaps and provide recommendations to the County Executive and Board of Supervisors.”

And it would be consistent with the Chatten-Brown letter (pg 3): “Before the CAP can be used as a streamlining plan, the Board should require a firm commitment that the CAP will have a target of carbon neutrality and demonstration it will achieve that target.”

The County should direct staff to begin implementing many of the CAP's measures now as well as recommendations by the Climate Emergency Mobilization Task Force (CEMTF). We know that much planning work is required before many CAP measures can be implemented. Additional recommendations:

- The CAP should set forth a methodology for new development to be carbon neutral, and get the methodology approved by CARB and/or SMAQMD. This would include an equation with factors and weighting.
- The Board should enact measures that would decrease GHG emissions and go into effect by a near-term date in advance of the finalized CAP or CEMTF recommendations. Examples include:
 - Only electric heat-pump water heaters and HVAC units may be installed in housing;
 - The County will stop purchasing fossil-fuel powered vehicles.

Regarding the CAP itself

The County should set forth a realistic phased approach to the achievement of carbon neutrality, and develop a full environmental review of the CAP. The CAP should set forth for 2030, 2035, 2040, and 2045, in narratives and graphs, an approach that includes these five aspects for each phase:

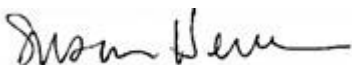
- 1) Scope of work, in terms that are measurable and enforceable;
- 2) Amount of GHG emissions reduced, with the reductions shown in relation to carbon neutrality;
- 3) Description of how the plan reflects CARB's 2022 Climate Change Scoping Plan and its Appendix D; and OPR's General Plan Guidelines (Chapter 8 - Climate Change);
- 4) Cost to accomplish the scope of work;
- 5) A vote by Board of Supervisors to fund the work: For 2030, the CAP scope will have funding that is fully budgeted and programmed; for subsequent phases, the funding will be planned.

This comprehensive approach will address the primary criticisms in the Chatten-Brown letter (pg 2):

- Need for stronger and enforceable measures. Weak measures that are used to streamline GHG mitigation of future development will result in "the deleterious effect of allowing projects to bypass GHG analysis and mitigation."
- Over-reliance on State, federal, and regional actions to meet GHG reduction targets.
- Need for a legally adequate CAP. Legal deficiencies in the draft CAP noted in the letter include:
 - It bypasses the required environmental review through its improper reliance on an addendum.
 - It creates new environmental impacts and does not meet the requirements of CEQA Guidelines Section 15183.5.
 - It does not demonstrate it complied with Climate Change mitigation measures CC-1 and CC-2 for the 2011 General Plan Update buildout.

Consistent with the concerns expressed by our fellow environmental organizations, we also recommend that staff pull Item 72 from the Board's consent calendar on July 11, 2023, to allow a full hearing on changes needed to finalize the CAP and changes, if any, to the Climate Emergency Resolution.

Sincerely,



Susan Herre AIA AICP
President of the Board of Directors

From: Smith, Todd <smithtodd@saccounty.gov>

Sent: Friday, July 7, 2023 1:46 PM

To: Chris Brown (info@sacclimate.org) <info@sacclimate.org>; Ralph Propper <rpropper47@icloud.com>; Susan Herre <susanherre@gmail.com>; Oscar Balaguer <oscarbal@hotmail.com>; ilonka.zlatar@350sacramento.org; Barbara Leary <barbaraleary@comcast.net>

Subject: FW:  Action Alert  - Request for clarification

Good afternoon everyone,

I'm writing to seek clarification from your respective organizations on the content of the 7/6/23 Action Alert below, which includes 350 Sacramento and Sacramento Climate Coalition logos.

The Action Alert and "potential messages" linked in the email indicate that the 2030 date for carbon neutrality identified in the 2020 Climate Emergency Declaration "is a stretch goal", and not a requirement of the State with "no legal consequences for failing to accomplish it". This messaging seems to contradict public comment letters from 350 Sacramento, Sierra Club, ECOS, and others on the Climate Action Plan. These comment letters allege "several legal deficiencies that must be addressed" (Chatten Brown letter, March 22, 2022), including a statement that "the CAP should set the County's Carbon Neutrality goal as set forth in the Board of Supervisors' Climate Emergency Resolution".

Request for clarification: What is the position of your organizations on whether the Climate Emergency Declaration should specify the County's carbon neutrality goal and be consistent with the Climate Action Plan?

The Action Alert also seems to imply that the work associated with the Climate Emergency Response Plan would be delayed. This contradicts the County's own messaging distributed to over 20,000 subscribers, which states:

"This recommendation does not change the actions of the Climate Emergency Mobilization Task Force or their timeline and commitment to working with the Sustainability Manager to prepare a Climate Emergency Response Plan. All County staff will continue to be ambitious and aggressive in reducing greenhouse gas emissions consistent with the Climate Emergency Resolution and Planning and Environmental Review staff will continue their diligent work to finalize the Communitywide Climate Action Plan."

The staff report for this item also states that staff understands the Board's previous direction to be ambitious and aggressive in reducing GHG emissions, and staff will continue to actively pursue GHG reductions, no matter which date is chosen unless and until the Board provides further direction.

Please reply and help us better understand the positions of your respective organizations on whether you view the date set by the Climate Emergency Resolution as a firm legislative target or simply an aspirational goal.

Thanks,

Todd Smith, Planning Director

Planning and Environmental Review

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