



**ECOS**  
ENVIRONMENTAL  
• COUNCIL •  
OF SACRAMENTO

Post Office Box 1526 | Sacramento, CA 95812-1526

August 23, 2023

Mayor Steinberg and Sacramento City Councilmembers  
Sacramento City Hall  
951 I Street, Sacramento CA, 95814

Sent via email

**RE: City of Sacramento Draft Climate Action & Adaptation Plan, April 28, 2023, referred to as "CAAP"**

Dear Mayor and City Councilmembers,

Thank you for the opportunity to comment on the Draft CAAP. Our main comments are as follows:

- The Plan should be upfront about its financial cost and clearly prioritize City actions according to cost-effectiveness in terms of emissions reductions per dollar.
- The Plan should address funding for underground infrastructure needed for infill development.
- The Plan should commit to preserving the Sacramento County Urban Services Boundary, which was put into place in 1993 to prevent greenfield development.

Please consider our complete comments in the following pages. We looked forward to engaging with you as the CAAP advances, in order to help make this plan the best as it can be for the present and future residents of the City of Sacramento.

Sincerely,

Susan Herre AIA AICP  
President of the ECOS Board of Directors

cc:

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## **1) Funding and Prioritization of CAAP actions**

The Plan should set forth proposed funding sources for the CAAP's estimated \$3.2 billion cost. The sources and a plan to acquire them should be in the Plan.

The Plan should prioritize the CAAP's actions, and correlate with near-, mid-, and long-term funding sources. Presently, Appendix D identifies four "priority City-led CAAP measures". This is a good start in addition to the Implementation Table, but all actions within the CAAP should be clearly ranked in terms of priority and cost-effectiveness.

## **2) Infill development and "backbone infrastructure"**

The Plan sets commendable targets for infill development, but it relies solely on policies, land use designations, and implementation programs to reach these targets. Meanwhile, the Plan largely ignores the inadequate capacity of underground infrastructure (storm, sewer, water) which causes higher density infill development to remain financially infeasible for many developers.

The Plan should address the need to accelerate this work to increase capacity in "backbone infrastructure" to enable infill development along existing commercial corridors served by transit. The Plan should prioritize this work for funding through a future taxing ballot measure or federal/state funding through SACOG's [Green Means Go](#) initiative. The Plan should acknowledge a partnership with SACOG as a means of furthering infill development.

## **3) Performance Indicators**

Overall, we identified many places in the Plan where performance indicators need to be improved. For example, many actions list performance indicators such as "VMT reduced" (TR-2.3), "EV chargers installed" (TR-3.2), "ZEV registration increase" (TR-3.8), or "[decrease in] per capita water use" (WW-1.7). Many of these indicators are expected to move in the desired direction irrespective of City action, due to broader state and national trends. Therefore, to effectively monitor the efficacy of the CAAP, all actions in the CAAP require specific, quantifiable, and measurable targets that account for baseline trends.

Furthermore, quantitative performance indicators are necessary for CAAP measures. For example, CS-1.1, the Urban Forest Plan, speaks to "prioritize tree planting in areas with the lowest average tree canopy cover and explore strategies to reduce barriers to tree planting in disadvantaged areas and improve tree health". The performance indicator of CS-1.1, however, does not numerically specify the proportion of trees which will be sited in low-income or disadvantaged areas.

#### 4) Emissions from Land Conversion & Protection of Biodiversity

Emissions from Land Conversion:

The City does not account for carbon emissions from conversion of natural land to developed land in its emissions inventory. The Plan does, however, include carbon sequestration from its Urban Forest Plan, CS-1.1, in its emissions inventory. [The California Supplement to the United States Community-Wide Greenhouse Gas Emissions Protocol](#) states that “carbon stocks and sequestration should be included in California inventories when changes in land use are substantial, in particular where urban development or agricultural expansion encroaches on woodlands, forest, and *wetlands*” (emphasis added). The City should not count sequestration, as with the Urban Forest Plan, if it ignores loss of sequestration through land conversion as, for example, with the greenfield development/wetland habitat in the Natomas Basin.

Protection of Bio-diversity:

It is very disappointing to see the City helping to lead an environmental study of the annexation of greenfield and farmland and subsequent conversion to 24/7 warehouses as part of the [Airport South Industrial Proposal](#). The land for the proposed project is zoned for agriculture, needed as habitat or ag land to support wildlife per the Natomas Basin Habitat Conservation Plan, and lies outside the Sacramento County [Urban Services Boundary](#) (USB).

The USB was established in 1993 as “a permanent boundary” to prevent greenfield development. If the City and County proceed with City annexation, the land should remain in agriculture or be conserved as habitat, and the USB boundary line remain unchanged.

The following excerpts from the [Sacramento County General Plan Land Use Element, amended Oct 2020](#), explain the environmental purpose of the USB:

“The Urban Policy Area (UPA) and Urban Services Boundary (USB) are the backbone of Sacramento County’s urban planning philosophy. *These growth boundaries are intended to protect the County’s natural resources from urban encroachment, as well as to limit costly sprawling development patterns. While the USB is intended to be a permanent boundary, the UPA is adjusted incrementally as needed to ensure that the County can accommodate anticipated growth over the next 25-year planning cycle. The area between the two lines is reserved for future urbanization.*” [pg. 19]

“Objective: Reserve the land supply to amounts that can be systematically provided with urban services and confines *the ultimate urban area within limits established by natural resources.*  
Intent: The Urban Service Boundary (USB) . . . indicates the ultimate boundary of the urban area in the unincorporated County. This boundary is based upon jurisdictional, *natural and environmental constraints to urban growth.*” [pg.20]

As a signatory to the [Natomas Basin Habitat Conservation Plan](#), which was based on the scientific expertise of federal and state wildlife agencies, the City has a responsibility to ensure the Plan’s success. This means adhering to the limit of 17,500 acres of permitted development as stipulated in the Plan. To this end, the CAAP should commit the City to opposing, for reasons related to negative impacts to climate, flooding, habitat, biodiversity, and VMT, development on existing agriculture land in the Natomas Basin on land outside the permitted areas.

## **5) Water Conservation**

The Plan should place greater emphasis on water conservation, particularly through native revegetation, replacement of ornamental and high-water-use landscaping, and installation of low-water-use landscaping.

The Plan should commit to identifying and phasing out nonessential turf citywide.

The Plan should set clear targets and a timeline for the use of nonpotable reclaimed water for landscape irrigation.

The Plan should make more ambitious use of stormwater recharge projects.

## **6) City Partnerships**

Actions wherein the City “supports”, “promotes”, or “encourages” a program led by another agency, such as SMUD or SacRT, should justify their inclusion in the City CAAP. Such actions should clearly describe the City’s role in the partnership, including what additional value the City’s involvement will bring to the program which would otherwise be absent.

## **7) Education and Outreach**

Actions regarding education and outreach should be directly linked to the success of the measure. Performance indicators for these CAAP actions should not consist only of developing fliers and educational materials, as many currently do, but should instead commit to reaching a targeted number of Sacramento residents and measurably affecting the broader performance indicator of the associated measure.

In addition, we believe that education and outreach efforts should be focused in particular on reaching lower income and minority communities. As part of this effort, we advise that educational materials and fliers should be made available in multiple languages to reflect the diversity of languages spoken in the city.

## **8) Phase 3?**

We note that action W-1.1, for achieving 75% organic waste diversion, is slated for Phase 3. The Plan does not define Phase 3. We believe that organics recycling can be pulled forward to Phase 1, especially since organics collection has already rolled out in the city.