



January 31, 2024

Todd Smith, Planning Director  
Sacramento County Planning and Environmental Review  
827 7th Street,  
Sacramento, CA 95814  
Via Email Only: [CEQA@saccounty.gov](mailto:CEQA@saccounty.gov)

**SUBJECT:** Notice of Preparation of a Subsequent Environmental Impact Report and Public Scoping Meeting for the Sacramento County Climate Action Plan

Dear Todd,

ECOS offers the following two comments on the subject document:

- 1) The Climate Action Plan (CAP) and SEIR should be complete, that is, they should show how carbon neutrality will be achieved in the County in whatever year the County believes is realistic.

Previous draft CAPs showed greenhouse gas (GHG) emission reductions only for the present to 2030. They provided little indication of how the second, more difficult half of the reductions will be accomplished. Because of this, the previous draft CAPs have been incomplete. One of the basic principles of any plan or project is completeness. When a plan or project is incomplete, observers like the Supervisors and the public become perplexed and confused. They cannot grasp of the enormity of the task because critical information has been withheld. At some point, incompleteness becomes obfuscation.

To make an analogy to a building project that is phased, let's take the California High Speed Rail project. From the start, the whole project was laid out. The entire route was shown along with the track's relationship to grade along the alignment, that is, where the track structure would be on-grade, where it would be elevated, and where it would be underground. The whole picture, with a cost and schedule, is laid out. The picture may have flaws, even major flaws. Implementation problems may occur and changes may be made. But no one can say that our political leaders and the public were not aware of the extent of the effort from the start.

We urge you to take this opportunity to show the whole picture of the GHG emission reductions that will be required to achieve carbon neutrality in the County – what sectors, how much reduction by sector, by which parties (County government and by others), and when such actions by sector are done over a clear time frame, and at what cost.

2) We know that land use and transportation are the keys to GHG emissions reduction. Therefore, the CAP and SEIR should include alternatives or scenarios showing three levels and locations of development – mostly greenfield, some greenfield/some infill, and mostly infill – similar the SACOG’s three Pathways for our region that were discussed by the jurisdictions last summer.

The County should assess the environmental impacts, especially the changes in GHG emissions and vehicle miles traveled (VMT), for each alternative or scenario to make clear to the Supervisors and the public the choices ahead.

You have said that such studies can only be done in the context of the Land Use Element in a General Plan Update, which is not scheduled for many years from now. I question this.

- The CAP needs to show these alternatives as part of understanding the whole climate picture. There is a nexus between land use and GHG and VMT as stated in state law.
- Why can’t such land use studies be conducted in another element of the General Plan, namely the Climate Action Plan and its SEIR, with the idea that implementation will occur through the future Land Use Element?
- Doing these studies now would build momentum for the update of the Land Use Element of the General Plan.

Thank you for your consideration of these comments.

Sincerely yours,

A handwritten signature in blue ink that reads "Susan Herre". The signature is fluid and cursive, with the first name "Susan" and last name "Herre" clearly distinguishable.

Susan Herre AIA AICP  
President of the ECOS Board of Directors

cc: Supervisors Kennedy, Desmond, Frost, Hume, Serna, BoardClerk@saccounty.net