



ECOS

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OF SACRAMENTO

Post Office Box 1526 | Sacramento, CA 95812-1526

August 29, 2024

Mr. Todd Smith, Director  
Sacramento County Planning and Environmental Review  
827 7<sup>th</sup> Street,  
Sacramento, CA 95814

*Via Email:* CEQA@saccounty.gov

**RE: County of Sacramento Climate Action Plan Draft 2024**

Dear Mr. Smith and County Staff:

The Environmental Council of Sacramento (ECOS) would like to thank the County of Sacramento for the extensive work they have done to prepare the Climate Action Plan (CAP). We appreciate the opportunity to review and comment on this important plan.

Below, we provide measure- and action-specific recommendations. We hope you will consider these recommendations to finalize an effective, CEQA-compliant CAP.

Sincerely,

Susan Herre AIA AICP  
President of the Board of Directors

Ralph Propper  
Chair of Climate Committee

Luz Lim  
Policy Analyst

**Overview:**

Thank you for taking the climate action plan out to 2045, and for providing Table 2.11 that shows anticipated GHG reduction by sector/measure by 2030 and 2045. We requested both of these things in the past and are glad to see them. Thanks also for explaining the additional reductions by 2030 needed to achieve net zero in 2045, and for setting the CAP's target accordingly to 48% of 1990 levels by 2030.

We recommend the County ask the California Air Resources Board for a specific review and comment on this CAP's targets and measures, the analysis underpinning the targets and measures, and the likelihood of achieving the County CAP's goals aligned with AB1279 (85% below 1990 by 2045).

**Greenhouse Gas Measures:**

We appreciate that this CAP has a more recent GHG inventory, but 2021 had abnormally low VMT due to Covid pandemic. According to the Federal Highway Administration, VMT since 2021 has risen by more than 10% nationally. Because emissions from other categories are not expected to have risen much, VMT may now be >50% in unincorporated County. As a result, the CAP probably overstates estimates of GHG reduction likely to result over the next several years. Therefore, the CAP should consider additional support for transit and infill development, and additional VMT reduction strategies for greenfield developments.

**GHG-02: Expand the Urban Forest**

GHG-02-c: Enforcement measures are necessary to ensure that developers follow the 50% canopy cover requirements and maintain that canopy coverage over time.

GHG-02-g: A majority of the urban forest consists of privately owned and maintained trees. While many residents may want to take advantage of the free tree services that the Sacramento Tree Foundation provides, renters may have little to no sway on the tree-related decisions that the property owner makes. We urge you to develop strategies that specifically focus on increasing tree planting on rental properties.

**GHG-04: Accelerate Existing Building Energy Efficiency Retrofits and Decarbonization**

GHG-04-n: Re portable heat pump HVAC loan system (E1): The County should ensure that the portable heat pump HVAC loan systems are practical for the intended users. We recommend conducting a survey and actively collecting feedback regarding the practicality of the loan system.

Additional Notes: Compared to the 2022 draft CAP, GHG reduction estimates for new building electrification have been lowered significantly. This was due to the recent Appeals Court Berkeley decision that was based on federal preemption for energy. However, the County could request the SMAQMD to develop regulations for this category, as the BAAQMD has done near Sacramento. SMAQMD staff asserts that BAAQMD's regulations are based on that region being out of compliance with federal NO<sub>2</sub> standards, but the Sacramento metro area is out of compliance with federal ozone standards. However, the Sac metro area is NO<sub>x</sub>-limited, which means that the most effective regulations to control ozone is to reduce NO<sub>x</sub> emissions, such as from combustion of natural gas in buildings. Therefore, County staff should discuss this with SMAQMD staff, and the CAP should include measures showing additional reductions similar to what the BAAQMD regulations are expected to accomplish.

We strongly recommend that GHG-04 and -05 actions for Residential Buildings be prioritized and accelerated, and that more stringent measures be included in the CAP. The Residential Building sector is a large and resistant part of our GHG problem. As the Summary Table below shows, the Residential Building sector will be relatively unchanged by County actions from the ABAU.

- In 2021, the Residential Building Energy sector is second only to On-Road Vehicles in GHG emissions produced: 878,300 out of a total of 4,159,600 MTCO<sub>2</sub>e. (Table 2.2)
- In the Adjusted Business as Usual Scenario (ABAU), after legislative and regulatory measures have gone into effect, in 2045, Residential Building Energy still has 499,700 MTCO<sub>2</sub>e forecasted, the most remaining GHG emissions, surpassing emissions from On-Road Vehicles. (Table 2.6)
- After the CAP Measures have gone into effect, Residential Building Energy has changed very little -- still has 411,600 MTCO<sub>2</sub>e remaining. Figure 2.10 graphically shows this.

| SUMMARY TABLE – Residential Building Energy MTCO <sub>2</sub> e |                |               |                       |            |
|---|----------------|---------------|-----------------------|------------|
|   | Forecasts      | Reductions    | Forecasts all sectors | Reference  |
| 2021  | 878,300        |               | 4,159,600             | Table 2.2  |
| 2045 ABAU   | 499,700        |               | 1,962,500             | Table 2.6  |
| CAP by 2030 Existing Buildings                                  |                | 10,400        |                       | Table 2.11 |
| CAP by 2045 Existing Buildings                                  |                | 69,200        |                       | Table 2.11 |
| CAP by 2030 New Buildings                                       |                | 1,700         |                       | Table 2.11 |
| CAP by 2045 New Buildings                                       |                | 6,800         |                       | Table 2.11 |
| <b>After CAP remaining in 2045</b>                              | <b>411,600</b> | <b>88,100</b> |                       |            |

**GHG-07: Increase EV Charging and ZEV Infrastructure**

GHG-07-n: A majority of the anticipated GHG reductions are attributed to a transition to electric vehicles. Table 2.11 shows a reduction of 290,800 MTCO<sub>2</sub>e by 2030, and a reduction of 220,400 MTCO<sub>2</sub>e by 2045 resulting from the increase of EV charging and ZEV infrastructure. A program that facilitates early retirement of internal combustion engine (ICE) vehicles would be crucial to utilize EV charging and ZEV infrastructure, rather than letting it sit idle and underused. What is the timeline of the feasibility study, and does that align with the GHG reduction estimates outlined above?

**GHG-09: Reduce VMT from New Developments**

GHG-09-b and GHG-09-d: How will VMT monitoring and tracking occur to ensure that self-reported data is accurate?

Additional Notes: We appreciate the CAP’s proposal for net zero carbon for new development, which we understand is based on plans by Jackson Road developers to achieve that goal. However, that goal can only be achieved at full build-out of each approved project (and those that the County may approve, such as other Jackson Road projects and projects in the Natomas Basin). Meanwhile, at partial build-out, GHG emissions would be far higher, without the density to support transit, and services in each development that would not encourage residents to drive elsewhere. Full build-out

of all these projects is very unlikely to occur by 2045. Therefore, the CAP may over-estimate the extent of GHG emission reductions expected from new development, even assuming approval of this net zero-carbon plan.

**GHG-10: Revise Parking Standards**

GHG-10-a: When evaluating the current utilization of parking, consider converting or redesigning underused lots to expand the urban tree canopy. To achieve tree canopy goals, we will need to uproot and redesign inherited infrastructure that is not conducive to tree planting or growth, particularly in EJ communities.

**GHG-12: Implement the Active Transportation Plan**

GHG-12-e: The Complete Streets Design Guide should include or be considered alongside information surrounding hotspots for bicycle injuries. Such hotspots should be prioritized for redevelopment.

**GHG-13: Advance Infill Development**

GHG-13-a: The Infill Coordinator should regularly consult developers when identifying the major barriers to quality infill development and proposing solutions to address those barriers.

Additional Notes: The County should adopt the City of Sacramento's new Missing Middle Housing Interim Ordinance to increase much needed affordable housing and relevant infrastructure.

**GHG-07, 08, 09, 10, 11, 12, 13:**

We strongly encourage the County to plan its "Green Zones under the SACOG Green Means Go program, with planning to include storm drainage and other underground utility capacity improvements, transit, complete streets, and medium to high density infill development of housing and local retail.

**GHG-14: Increase Organic Waste Diversion and Landfill Gas Capture**

GHG-14-c: Organic waste diversion efforts should include materials requirements for business. For example, restaurants should provide single use items (i.e., utensils, containers) that are compostable.

GHG-14-e and GHG-14-f: When teaching the public and students about waste sorting, include educational materials surrounding the environmental benefits of composting. Partner with scientists and local organizations to create holistic workshops, providing educational background and connecting people to local resources and leaders. Create grant programs to incentivize food waste education programs.

**GHG-16: Expand the Use of Zero-Emission Construction and Agricultural Equipment**

GHG-16-b and GHG-16-c: Ensure accessibility of educational information and incentives lists. This includes publishing the information in various languages and diversifying the means of information distribution (i.e., brochures, workshops, partnering with local farming organizations to distribute informational materials).

**Climate Adaptation and Resilience Strategies**

1. The County should bolster their requirements for community engagement in redevelopment projects.

ECOS applauds the task force's recommendations to involve community members in planning and implementation processes for redevelopment. Solid relationships built on trust and mutual agreement are necessary to redevelop areas without displacing or alienating members of existing communities. We encourage the County to create a framework that requires specific procedures and deliverables when engaging with communities, identifying community needs, and redeveloping communities. Such procedures may include collaborating with community-based organizations (CBOs), organizing a community task force for specific projects, or hosting a minimum number of workshops to gather public comments. Required deliverables should reflect a clear understanding of community priorities and how those priorities will be addressed through redevelopment. The County should collaborate with CBOs like Sacramento Investment Without Displacement (SIWD) to create a framework for community redevelopment projects.

**Flood Measures:**

FLOOD-01: Evaluate and Improve Capacity of Stormwater Infrastructure for High-Intensity Rainfall Events

FLOOD-01-a: Provide specific funding and implementation guidelines for green infrastructure.

Conduct studies to outline ranked priorities for the green infrastructure development, citing the effectivity of different flood control methods. Outline priority areas and justifications for their identification.

FLOOD-01-b: Identify areas that are prone to flooding and develop both short and long-term plans for their maintenance.

FLOOD-02: Improve Sewage and Solid Waste Management Infrastructure

FLOOD-02-a: Addressing water and sewage infrastructure will be essential to advance other GHG reduction strategies, including increased infill development. We strongly encourage the County to plan its "Green Zones" under the SACOG Green Means Go program, with planning to include storm drainage and other underground utility capacity improvements, transit, complete streets, and medium to high density infill development of housing and local retail.

FLOOD-04: Coordinate with Federal, State, and Local Agencies to Improve Emergency Evacuation and Supply Transportation Routes

FLOOD-04-a and FLOOD-04-b:

- Develop workshops and educational materials to inform the public of vulnerable areas and evacuation routes. Make sure that evacuation plans are accessible to those without motor vehicles.
- Develop communication plans for emergency evacuation situations. Make sure that communications are accessible across language, literacy, and technological barriers.

FLOOD-05: Invest in Use of Pervious Pavements and Landscaping in Developed Areas and Restrict the Use of Paved Surfaces

FLOOD-05-a and FLOOD-5-b:

- Evaluate filtration capacities in areas with pervious pavements.
- Ensure ADA compliance in areas with pervious pavements.

FLOOD-12: Replant Bare or Disturbed Areas

FLOOD-12-a: Develop a plan to address bare land on private property, including:

- Create incentives for private property owners to replant bare lands.

- Create guidelines for the appropriate vegetation species to plant. Provide resources, including programs with relevant organizations, similar to the tree planting services that the Sacramento Tree Foundation provides in urban areas.

### **Sea Level Rise Measures:**

SLR-05: Guide Future Development Out of Areas Vulnerable to Sea Level Rise

#### SLR-05-a:

- Publish maps with provisional areas for future development, in response to sea level rise. What measures will be taken to mitigate sprawl during such development?
- Outline measures and resources to assist lower income and other vulnerable populations to relocate ahead of emergency conditions.

### **Wildfire Measures:**

FIRE-06: Collaborate with Agencies and Organizations on Programs to Reduce Wildfire Hazards

FIRE-06-a: The County should also collaborate with Native Tribes to discuss land management practices, including the use of controlled fires for wildfire hazard mitigation.

### **Drought Measures:**

WATER-02: Increase Onsite Greywater and Rainwater Reuse, Stormwater Reuse, and Recycled Water Systems

WATER-02-e: Would a rainwater capture system be more efficient than allowing rainwater to percolate and be filtered through an aquifer?

WATER-03: Create Incentives and Programs to Transfer Knowledge and Technologies to Assist Farmers With New Production Methods and Drought-Tolerant Species

#### WATER-03-a:

- Partner with the University of California Agriculture and Natural Resources and the California Farm Bureau Federation to identify drought-tolerant crops.
- Develop a program between farmers and local groundwater sustainability agencies to divert floodwater during the rainy season.

WATER-03-c: Drip irrigation is not recommended for native or drought-tolerant plants. Additionally, drip irrigation has the potential to use the same amount of water, just over more land, and with less percolation back into groundwater storage.

WATER-04: Reduce Potable Water Use in Outdoor Landscaping

- Evaluate the possibility of using greywater for outdoor landscaping in residential areas. Develop incentives for property owners to use greywater.

WATER-05: Expand Upon Existing Water Conservation Education and Outreach Programs for Residents and Businesses

WATER-05-a: Instead of focusing on individual actions, we need to put pressure on water intensive farming practices. This education campaign could focus on how people buy their food and understanding the environmental impacts of different food choices.

#### **The Climate Action Plan Consistency Review Checklist (Appendix B):**

We commend the creation of the Checklist, which would incorporate more GHG reduction measures and actions in development projects. However, the guidelines leave room for projects to fall short of the Checklist requirements without clarifying the point at which the proposed project would not be approved based on insufficient GHG reduction measures:

- 4. If the proposed project is not consistent with the General Plan land use or zoning designations, or the growth forecasts of the CAP, does the project include a land use plan and/or zoning designation amendment that would result in equivalent or less GHG emissions when compared to the existing designations?**

Methodology: Compare the maximum buildout of the existing designation and the maximum buildout of the proposed designation using the California Emissions Estimator Model (CalEEMod) and standard GHG modeling protocol and methods pursuant to CEQA.

If **"Yes"**, attach to this checklist the estimated project emissions under both existing and proposed designation(s) for comparison. Compare the maximum buildout of the existing designation and the maximum buildout of the proposed designation. If full buildout of the proposed project would result in the same or fewer GHG emissions than full buildout of the existing designations, proceed to Step 2: Demonstrate Consistency with CAP Measures and Actions.

If **"No"**, the project proponent must conduct a full GHG impact analysis for the project as part of the CEQA process. The project shall incorporate each of the applicable measures identified in Step 2: Demonstrate Consistency with CAP Measures and Actions to mitigate cumulative GHG emissions impacts.

Does this mean that projects do not need to comply with the requirements outlined in the Checklist for GHG reduction? We recommend that the CAP clarify and require project compliance with this Checklist. We also recommend that the Checklist include the need for community engagement and the production of a community benefits agreement.