



ECOS

ENVIRONMENTAL
♦ COUNCIL ♦
OF SACRAMENTO

Post Office Box 1526 | Sacramento, CA 95812-1526

November 6, 2024

Mr. Todd Smith, Director
Sacramento County Planning and Environmental Review 827
7th Street, Sacramento, CA 95814
Via Email: CEQA@saccounty.gov

**RE: County of Sacramento Climate Action Plan, Final Subsequent Environmental Impact Report (SEIR)
(State Clearinghouse No. #2023120386, County Control Number PLNP2016-00063).**

Dear Todd and staff,

The Environmental Council of Sacramento (ECOS) appreciates that County staff have developed a better Climate Action Plan than its 2022 version. However, we still have major concerns that must be addressed before we can support it.

We disagree with the sentence on p. 1-24 of the SEIR, “The CAP would not result in any new or substantially more severe land use and planning impacts or contributions to cumulatively considerable impacts compared to the impacts identified in the GPU EIR.” Because the County has approved several greenfield projects, lower-VMT infill projects are less likely to be developed. Infill projects often need infrastructure improvement, such as ‘Green Means Go’ has demonstrated, that competing greenfield projects don’t need. Approval of the CAP streamlines greenfield development projects, because they would no longer need to show how their project will lead to lower GHG emissions, but rely on the County’s CAP. However, many of the measures in the CAP are not guaranteed – for example, SMUD acknowledges that achievement of its 2030 zero-carbon goal is not guaranteed but relies on unproved new technology.

For greenfield development projects to achieve the goals of the CAP, according to GHG 08-b, the County Board of Supervisors must “Adopt an ordinance establishing the VMT Impact Fee Program that allows project proponents to pay for offsite VMT mitigation after all feasible onsite mitigation has been implemented and project VMT is still above the significance threshold.” Because the level of fees is not yet determined, the Board may find it difficult to adopt an ordinance sufficient to achieve the goals of the CAP.

A better approach could be the “Carbon Neutral Alternative”, if coupled with the following: 1) no out-of-county carbon offsets, because the County would have difficulty verifying their validity, and 2) the need for sequential development of master plan communities. This is necessary because until full build-out is achieved, GHG emissions from VMT would likely be much higher. Before development is complete, density would be insufficient to justify SacRT service, nearby services would be limited, and jobs/housing balance would also not be available.

Finally, CARB’s Scoping Plan includes a 15% reduction in VMT. However, the CAP does not provide a path to achieve this requirement.

Sincerely,

Ralph Propper, Chair of Climate Change Committee

Susan Herre AIA AICP, President of the Board of Directors