



ECOS
ENVIRONMENTAL
• COUNCIL •
OF SACRAMENTO

Post Office Box 1526 | Sacramento, CA 95812-1526

February 15, 2026

TO: Sac Metro Air District via email: AB617clerk@airquality.org

RE: ECOS Comments re South Sacramento-Florin Community Emissions Reduction Program Plan (<https://bit.ly/3NqBDNp>)

Dear Sac Metro Air District,

The Environmental Council of Sacramento (ECOS) is a 501c3 non-profit corporation, a coalition of community-based organizations and individuals from throughout the Sacramento region that helps drive conversation and action for good planning.

ECOS is very supportive of this plan and applauds the Sac Metro Air District and the Community Steering Committee (CSC) for their extensive work to create multi-scale strategies that include and reflect the South Sacramento – Florin community. We appreciate the opportunity to submit the following comments on the South Sacramento – Florin Community Emissions Reduction Program (CERP) Draft Plan.

Executive Summary

1. **Funding Plan:** The Executive Summary, the District Feasibility Analysis, and various individual Strategies indicate that the implementation of all 28 strategies depends on available District funding and capacity. While it is great to see that implementation is guaranteed for half of the strategies – including early-action and top-priority strategies – it is unclear if other potential funding sources are identified for the remaining fourteen strategies, and if there is a strategy for future funding identification. Funding details, and their reliability, would be appreciated to assess the feasibility of strategy implementation.
2. **Emission Projections:** We understand and appreciate the disclaimer that the CERP assumes the continued implementation of California’s Clean Air Act waive authorities. If possible, it would be helpful to see potential emission projections in the case that the Clean Air Act were reduced or eliminated.

Community Profile

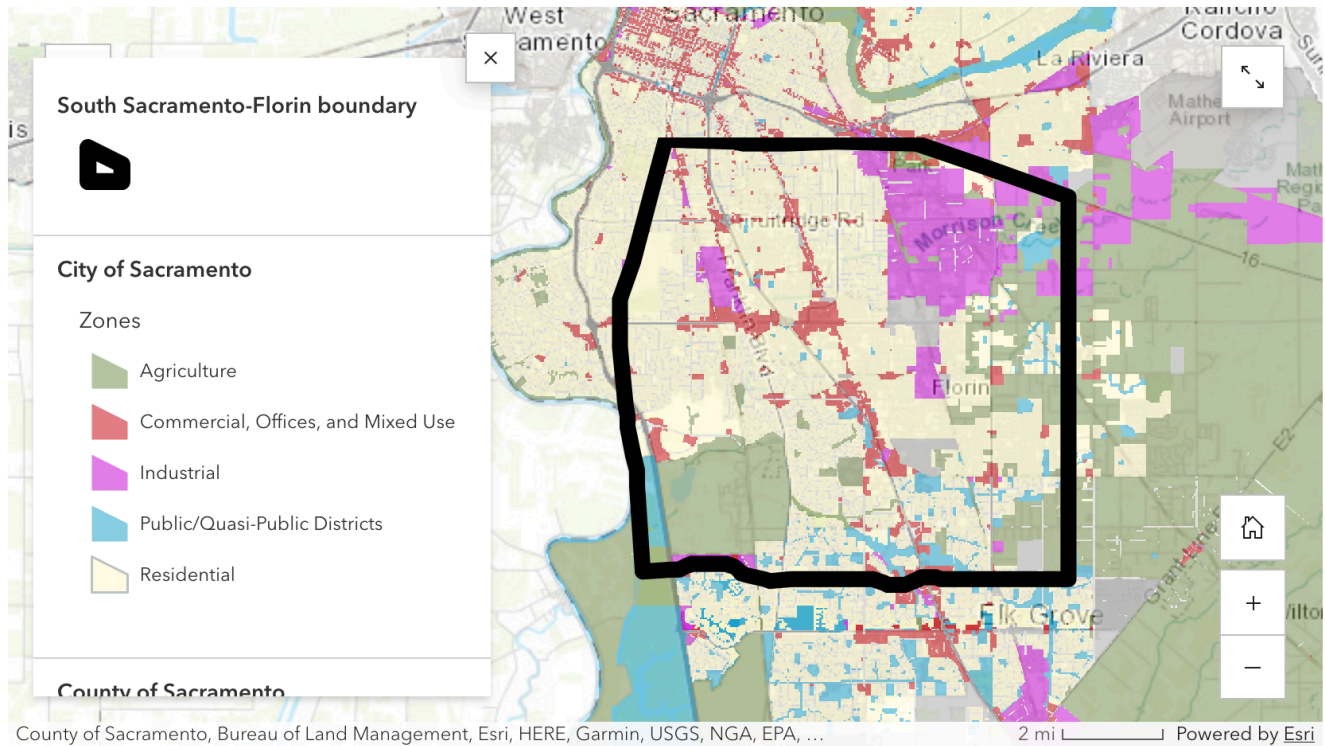
3.3.1.3 Median Household Income

Figure 3-7 is helpful to understand the income levels of particular neighborhoods, and disparities across the County. However, it is unclear how the census data and resulting map consider public areas, such

as the American and Sacramento Rivers. Could you provide additional information regarding the ownership/income interpretation for public/natural areas, or add a mapping layer (e.g., Figure 3-10) to distinguish these areas from areas with reportable household income? Do these areas skew the median income profile for the selected South Sacramento – Florin community?

Technical Foundations

Land Use and Zoning (Material from the Story Map)



Zoning in the South Sacramento-Florin community

Sources: City of Sacramento, County of Sacramento, City of Elk Grove

1. This is a fantastic map that demonstrates the geographic relation between residential and industrial zones, and between commercial and heavy traffic routes. The impact of land use planning on a community's air and health quality should be explicitly stated throughout the CERP to encourage strategic land planning and reorganization.
2. It would be helpful to include the geographic models and land use plans of other areas that have less air pollution. Explicitly correlating the geographic distributions of land uses with air quality, and providing a comparative model, would not only highlight the importance of prioritizing land use improvements to reduce emissions in the South Sacramento – Florin area, but also provide a working land use model to strive towards. Of course, the intention is not to turn South Sacramento – Florin into another existing neighborhood, and great care should be taken to avoid gentrification and cultural erasure. However, it is clear that the sprawled, car-centric layout of the area fosters high emission levels. To change it, we must look at realistic, comparative models, such as the work being done around the Marysville-Del Paso Blvd Plan.

4.4.4.2 Forecasted Emissions Inventory 2031/2036: A look at the baseline emissions inventory during CERP implementation period

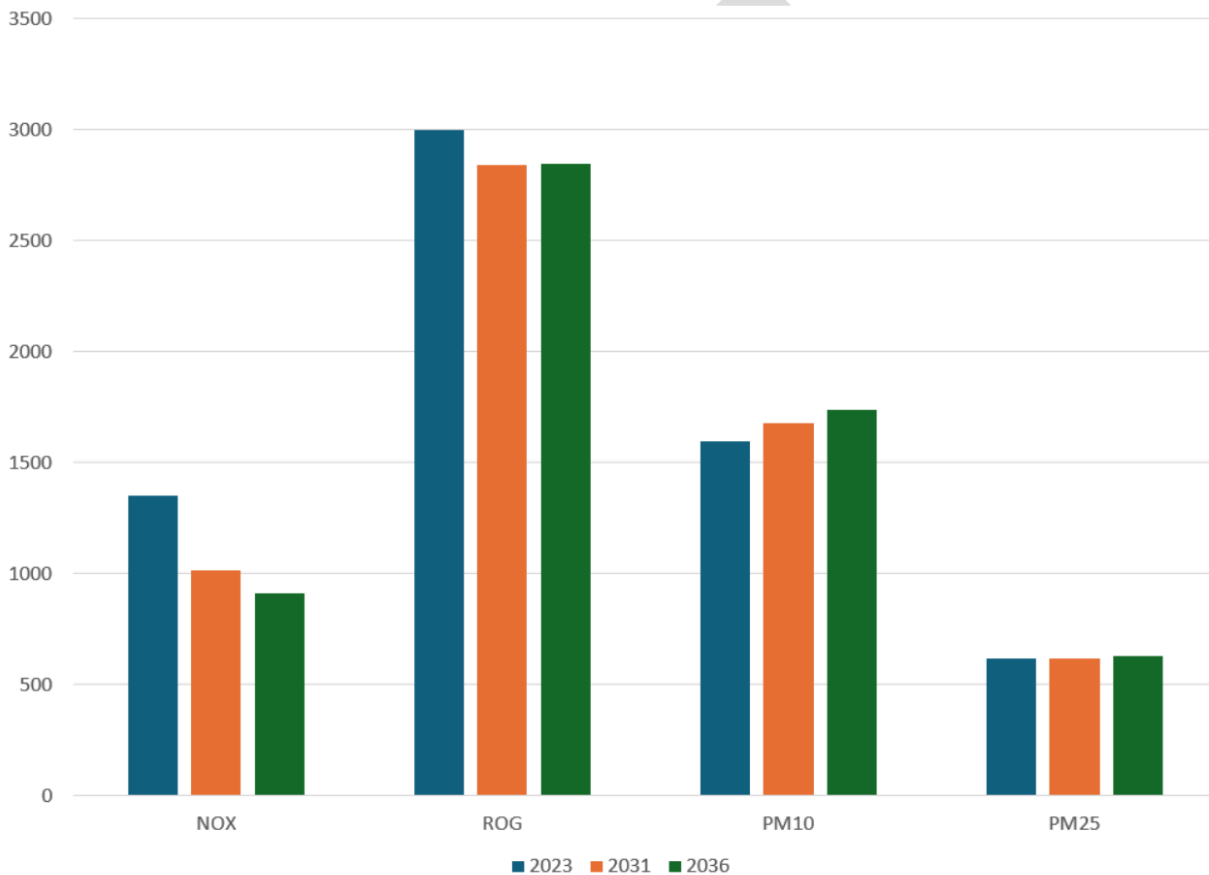


Figure 4-24 Total Emission Trends in tons per year for NO_x, ROG, PM₁₀ and PM_{2.5} for 2023, 2031, and 2036 (tons per year).

1. It's great to see that NO_x and ROG emissions are projected to drop in the next 10 years, as a result of air quality regulations related to mobile sources. However, it is unclear what kind of health impacts these reductions would translate to. While the projected NO_x emissions appear to be reduced by what appears to be roughly a quarter to a third, the ROG emissions are not anticipated to be reduced by nearly as much. Please provide perspective to correlate the change in these values with real impact values, particularly when circulating updated emission data at public outreach events.
2. While the draft CERP correlates the anticipated rise of PM₁₀ and PM_{2.5} values to emission sources such as construction and demolition activities, the Story Map explains this projection as a result of "probable economic growth and population growth." Please clarify the overlap of these two explanations or address the discrepancy. Additionally, please outline the foundation to anticipate economic and population growth, as indicated in the Story Map. Are there plans that would point to such trends? If so, then we recommend providing the CERP and other related plans to the project developers/environmental review team to encourage low-emission, higher-density development.

Strategies and Actions

We support all strategies identified in the CERP Plan. We strongly support the following strategies and provide additional comments and suggestions.

Strategies	Comments
UM-1, UM-2	The biggest air pollution problem in the area is from diesel trucks - due to their cancer-causing fine particulates. It would be incredible and highly impactful if portable monitors were used to identify high emitters and led to citations for non-compliance.
UM-3	<p>Trees and tree canopy are incredibly helpful to reduce heat and to trap fine particulates.</p> <p>Funding and maintenance strategies are important for urban forestry plans. We applaud the strategy's plan to fund the South Sacramento Tree Alliance project related to the South Sacramento – Florin area, as the project and organization would provide structure to the initial planting of trees and outreach in the community. Would the South Sacramento Tree Alliance continue to maintain the trees they plant? Similarly, who would be responsible for the maintenance of the 300+ trees distributed to the South Sacramento – Florin Community in partnership with Color the Block? We recommend clearly outlining the funding, planting, maintenance, and outreach responsibilities involved in each sub-strategy for expanding the urban tree canopy. We also recommend providing transparency regarding the projected availability and reliability of new funding sources and programs related to tree planting/vegetative barrier projects.</p> <p>Lastly, what kinds of trees will be planted? Are there requirements or guidelines for the kinds of trees that are planted through the various tree planting and distribution programs that may be involved in this strategy? We recommend consulting local experts (e.g., Sacramento Chapter of the California Native Plant Society, amongst many others) regarding the trees that are more suitable to expand Sacramento's urban canopy.</p>
UM-4a, UM-4b	<p>We support the use of multi-scale strategies to create safe streets. Partners for both strategies should include local NGOs that often collect qualitative data surrounding transportation, user experience, and public health (e.g., La Familia and Strong SacTown (if Strong SacTown has membership in South Sacramento)).</p> <p>Tracking metrics:</p>

	<p>UM-4a: Tracking metrics for quick builds should include collecting data on accidents, the amount of car vs pedestrian vs cycling traffic, and qualitative input on the comfort and safety levels experienced and perceived related to pedestrian and cycling options.</p> <p>UM-4b: Tracking metrics for Safe and Resilient street standards include the “Number of VMT reduced in specific routes, where changes were in effect.” How will this data be tracked?</p>
<p>UM-6</p>	<p>It is difficult to limit the impacts of idling on sensitive receptors when idling is so frequently tied to pickups and drop offs in such locations. One of the identified actions include working with public works departments to ensure loading zones are away from sensitive receptors. Are these loading zones referring to loading of heavy duty vehicles, such as trucks, or do these zones also include passenger pickup/drop off? If the latter is true, then it seems that it would be difficult and reduce accessibility to move loading zones further from the sensitive receptor locations.</p> <p>Additionally, signage may be helpful to create grounds for anti-idling enforcement, but signs alone generally do not stop people from idling in areas where they have historically been able to, or where they know they will not face repercussions. We encourage an action item that involves working with schools to ensure that there are security/monitoring resources dedicated to anti-idling policy enforcement.</p>
<p>UM-7</p>	<p>We strongly support the distribution of portable air monitors and recommend partnering with local NGOs that have already done outreach work on the topic of air quality and portable air monitors and air filters (e.g., United Latinos). Such partnerships, along with educational support and potential incentives, could be key to engaging community members.</p>
<p>UM-8</p>	<p>We strongly support investments into public transit and ridership, and applaud partnership with SacRT for this plan. We recommend re-designing and relocating shade structures so that they are large enough to provide shade for the number of riders, positioned in ways that offer realistic (i.e., directional) protection from sun and rain during different times of the year/day, make use of existing buildings and tree canopies that already provide effective shelter, and increase the occurrence of benches/rest features.</p> <p>In your consultations with SacRT, we also recommend re-evaluating the bus stop structure. There have been many studies between European bus service and North American bus service showing that the latter has too many stops on bus lines, which result in decreased efficiency and speed of service. From a cost perspective, a push to reduce the number of stops on lines while investing</p>

	in more robust shade structures may be a fiscally (and operationally) responsible solution.
UM-9a, UM-9b	Warehouses are the main source of heavy-duty truck traffic through the Florin area. Buffer zones and vegetative barriers are especially effective for reducing exposure to fine particulate matter (PM), especially the ultrafine particles that cause many health problems (e.g., cancer, low birth-weight babies, decreased lung development in children, increased cardiovascular disease).
R-4	We strongly support the installation of more air filters in public indoor spaces. This would reduce exposure to infectious diseases from those present, and would be especially good for community spaces impacted by PM, as stated (e.g., schools near freeways). MERV-13+ and HEPA is the way to go.
C-2	We strongly support the creation of a public records portal. Public education is empowering and may lead to future community leaders!
C-3	Potential Partner Agencies/Organization Responsibilities should include providing program requirements and educational materials to new/applying business owners. The communication of resources and requirements early in the planning process can streamline air quality improvement efforts and reduce the need for retrofitting later on.
O-1	What feedback have you received from past outreach events? Have they been effective? Are there ways that have been identified to be more effective?

Thank you for considering our comments. We look forward to the successful implementation of the South Sacramento – Florin CERP!

Sincerely,

Luz Lim
Policy Analyst
Environmental Council of Sacramento