



October 7, 2020

Members of the Board,  
Cosumnes Community Service District

District 1 - Gil Albiani

District 2 - Jaclyn Moreno

District 3 - Jim Luttrell

District 4 - Orlando Fuentes

District 5 - Rod Brewer

Via electronic submittal

Dear Members of the Board:

**CCSD CAP (AGENDA ITEM #21): COMMENT**

We appreciate the opportunity to comment on Cosumnes Community Service District's *Climate Action Plan*. 350 Sacramento is a grassroots organization advocating deep cuts in GHG emissions in this decade, by 2030, as the science dictates. We commend CCSD for identifying actions it can take to play its part in reducing the impacts of climate change. Needless to say, CCSD's first-responder responsibilities put it literally on the front-line of climate change response, during this cataclysmic wildfire year and into the foreseeable future.

Our specific comments on CCSD's CAP follow.

**1. EFFECT OF THE CAP.** The CAP projects that CCSD GHG emissions will remain steady in coming decades, notwithstanding a projected increase in CSD operations as a result of population growth (Figure 15, p. 5-1). This is praiseworthy, but does not actually contribute to the statewide and global goal of *reducing* GHG emissions, which must be achieved to avoid climate catastrophe.

**2. SUGGESTIONS TO IMPROVE CAP MEASURES.** CCSD's two largest emission sectors, comprising the great bulk of its total emissions, are its buildings/facilities and vehicle fleet. We suggest as follows that further significant reductions can be feasibly achieved by:

- A. Strengthening building electrification
- B. Strengthening vehicle electrification and EV charging
- C. Clarifying the intent of other CAP measures

**A. Strengthening Building Electrification.** Emissions from buildings/ facilities are CCSD's largest emissions source, now and in future (Figs 9 and 10, p. 4-2). The CAP states, "*emissions from the Buildings and Facilities sector would grow due to the continued and increasing consumption of natural gas*" (p. 4-3).

CAP Measure *BD-3, Limit Natural Gas Use* (p. 5-6) explains that reducing use of natural gas is an effective and cost-effective way to reduce GHG emissions, and describes how that

*could* but done, but provides no clear policy guidance directing that CCSD actually transition to all-electric energy.

We suggest that the title and first paragraph of the measure be revised to read:

*Measure BD-3: Transition CCSD facilities to all-electric. CCSD shall transition to all-electric power in buildings and facilities as soon as feasible, except where gas combustion is determined by the Board to be essential for specified mission-critical purposes. This will be accomplished by replacing all existing gas appliances with electrical models at the end of their service life, or sooner as feasible; and by designing all new CCSD facilities to be all-electric.*

This more definitive statement is consistent with what other jurisdictions are doing:

- Sacramento County recently required that two major new mixed-use developments (Mather South and NewBridge) be all-electric, including for water and space heating, and cooking.
- The City of Sacramento's draft CAP<sup>1</sup> includes Measures E-1, "Eliminate natural gas in new construction"; and E-2, "Transition gas in existing buildings to carbon-free energy by 2045". The City is currently drafting an early-action ordinance requiring all-electric construction for low-rise (up to three stories) residential construction by 2021; to be followed for all new construction, probably in 2023.
- Statewide, 30 local jurisdictions within the last few years have adopted some form of all-electric requirement for new construction.

**B. Strengthening EV Charging and Vehicle Electrification.** Emissions from its vehicles are CCSD's second-largest current and projected emissions source.

CAP Measure LP-3: Provide Electric Vehicle Charging Infrastructure (p. 5-16 ff.) suggests, "CSD may inventory existing parking lots and determine where installation of electric vehicle charging stations could be feasible", and presents, "...the conservative assumption that two percent of vehicles would be replaced by electric versions by 2050".

These proposal and assumption are markedly conservative, and out-of-line with what more progressive local jurisdictions are doing:

- The market share of EVs and plug-in hybrids in California is *currently* 7.9 percent, already far exceeding the CAP's 2050 assumption.
- California's goal for EV adoption is to have five million State-registered vehicles on the road by 2030.
- State Executive order N-79-20 directs that, by 2035, all new cars and passenger trucks sold in California be zero-emission vehicles.
- Title 24, California Building Code, specifies detailed requirements for EV charging infrastructure in new developments.
- According to the California Air Resources Control Board, retrofit costs of \$3,750 - \$6,975 per charging space could be avoided by installing EV charging during construction.

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<sup>1</sup> Rincon Associates, August 2020. *Draft City of Sacramento Climate Action Plan Update*, Table 1.

- Providing workplace charging or charging at popular family sites such as parks and municipal centers provides apartment owners or families in older housing a location to charge, and avoids expensive future retrofits, when electric cars dominate the fleets.
- Sacramento County recently required as conditions of approval that two major planned mixed-use developments (Mather South and NewBridge) provide EV charging infrastructure to Title 24, Tier 2 standards, exceeding the basic statewide mandate.
- The City of Sacramento's draft CAP<sup>2</sup> includes Measure TR-3, "Transfer 28% of passenger and 22% of commercial VMT to zero emission vehicles (ZEV) by 2030 and 100% by 2045."

We suggest that the first paragraph of this measure be revised to read:

*CCSD shall support the use of EVs through the provision of electric vehicle charging stations at Cosumnes CSD-owned facilities. CCSD will inventory existing parking lots to determine where installation of electric vehicle charging stations is feasible, and will design all new CSD parking facilities to meet Title 24, Tier 2 standards for EV charging.*

CAP Measure TR-3: Optimize Cosumnes CSD Vehicle Fleet, would, "Encourage future vehicle purchases be alternatively fueled vehicles", and notes, "... electric and alternatively fueled heavy-duty vehicles as well as electric passenger vehicles and trucks are already becoming more widely available".

This would provide unaccountably limited direction for a cost-effective action CCSD can take to substantially reduce GHG emissions. As noted above, the transition to EVs is already happening far more quickly than the above two measures account for. Importantly, for passenger vehicles and in other applications, EVs are *already* cheaper than gas-fueled cars on a life cycle basis due to substantially reduced O&M costs.

This cost-differential will increase. Every vehicle manufacturer is aggressively competing for future EV market share; rapid progress is being made on electrifying light and medium-duty trucks (many already in service in large US fleets); and heavy-duty, long-haul carriers are now on the road on a pilot basis.

We suggest that the Title and first paragraph of TR-3 be revised to read as follows:

Measure TR-3: *Transition Cosumnes CSD Vehicle Fleet to Zero-Emission.*  
Transition the fleet to EV or other zero-emission models by replacement at end of fossil-fueled vehicle service life or sooner as feasible; except where ZEV's are determined by the Board to be not available or not cost-effective on a life-cycle basis for specified mission-critical applications.

- C. Clarifying the intent of CAP measures.** Many if not most of the proposed CAP measures are soundly based, but are of uncertain effect because they are stated aspirationally as what the CCSD *could* do, rather than what it *intends* to do. This is inconsistent with the CAP's purpose as an "Action" plan; and does not adequately respond to the urgency of climate change.

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<sup>2</sup> Ibid.

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We suggest that the language of the CAP's proposed technical and implementation measures be re-visited, to offer the Board the opportunity to make considered policy decisions on what CCSD will actually commit to do to combat climate change.

### 3. IMPLEMENTATION

- A. **CAP Administration.** The CAP states that the Board *could* assign responsibility to a staff position with adequate seniority to ensure implementation; and *could* direct creation of a CAP webpage (p. 6-1). We suggest these statements be revised to specify and direct such actions.
- B. **Reporting.** Accountability is essential to ensure implementation. We suggest the CAP provide for at least annual reporting to the Board on implementation status and issues, on a stated schedule to facilitate public review.
- C. **CAP Update.** The CAP proposes future updates during the Master Plan Update process (p. 6.2), without indicating the resulting update interval. Regular updates are needed because time is of the essence in reducing GHG emissions, and ineffective measures or implementation need prompt correction. The average CAP update frequency in the six-County Sacramento region is less than five years. Because CCSD is not a general-purpose government, a less-frequent interval may be justified, but should be on a schedule certain, not outstandingly less frequent than the regional average.

4. **CEQA CONSIDERATIONS.** There is no discussion in the staff report of a CEQA compliance, so it appears that CCSD does not intend the CAP to be a "CEQA-qualified" plan from which future environmental analyses may be tiered. As such, future CCSD Board decisions subject to CEQA will continue to be required to have stand-alone GHG analyses and mitigation. To avoid possible confusion and resulting legal issues the CAP should include a clear statement regarding the CEQA status of the CAP

5. **CCSD'S GOAL.** The CAP's goal is stated as achieving consistency with the CAPs of Elk Grove and Galt and facilitating their implementation (pp.-5). Such consistency is of course desirable, but as a goal statement seems inappropriately limited. CCSD has its own front-line responsibilities, powers, and opportunities to reduce GHG emissions. If CCSD's policy intention is to minimize GHG emissions within its authority in order to do its part in fighting climate change, that should be reflected in the goal statement.

6. **STATE TARGET.** The CAP cites Executive Order S-03-05 as setting the statewide GHG emission target (p, 4-3 and passim). This should be corrected, because EO S-03-05 was explicitly superseded in 2018 by EO B-55-18, which sets a more stringent statewide goal of carbon neutrality by 2045

Thank you again for your efforts to reduce the impacts of climate change. Please let us know if we can assist any other way.

Sincerely,



Oscar Balaguer, Co-Chair

CAP Team

Cc: 350 Sac CAP Team  
Laurie Litman, 350 Sac  
Ralph Propper, ECOS  
Barbara Leary, Sierra Club, Sacramento

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