



November 19, 2020

Todd Smith, Principal Planner
Planning and Environmental Review
Sacramento County
827 7th Street
Sacramento, CA 95814

Via Email

Dear Todd,

COUNTY CAP - NOV 6, 2020 TECH MEMO: COMMENTS

Thank you for the chance to review Ascent's CAP tech memo. Recognizing that this is a preliminary product we offer comments in the hope they will usefully inform succeeding products.

GENERAL COMMENTS

The Tech Memo asserts that the County will meet SB 32's statutory target based on adjusted BAU, i.e., State and regional efforts by other agencies, including implementation of SMUD's 2020 emergency climate declaration. The Memo also presents a number of County actions to indicate a trajectory towards the State's 2045 goals; most notable among these is measure CLS-01 requiring electrification of new commercial and high-rise residential buildings.

We urge a more ambitious local program. Measure CLS-01 is appropriately strong, but other County measures appear at this stage only conceptual because lacking implementation specifics. We know the next ten years are critical to reversing the global emissions trajectory. We urge the County to establish a more ambitious program for its first decade of CAP implementation, whether BAU actions achieve the 2030 target or not. As science makes clear, rapid reduction of mass-loading of GHG to the atmosphere is needed to avert cataclysmic climate change. Checking off a statutory requirement does not fulfill Sacramento's responsibility to help avoid that catastrophe.

The State's 2045 goal is likely to be codified. Whether it is or not, the longer that effective local measures are postponed, the more difficult it will be to reach the carbon-neutral goal, which is itself only a stepping stone to climate restoration.

Policy-related measures. We continue to strongly encourage consideration of policy-level measures in the CAP, including:

- Land-use alternatives, specific enough to present policy choices and allow calculation of GHG emission differentials, e.g.:
 - Accommodating residential growth in high density versus low density development;
 - Accommodating most compact development around transit, consistent with SACOG's MTP/SCS 2040 projection, versus continuation of historic County development patterns

- Review of legacy policies, zoning, and standards which may be impediments to climate-friendly actions, e.g.,
 - Permit criteria and process for installation of gray water and other water-efficient plumbing, as described in GRN-11
 - Standards such as that discussed at stakeholder meeting #4: builders are asked to invest in features encouraging non-auto transport, but must still build roads to auto-centric standards.

SPECIFIC COMMENTS

Table 1. In summarizing Ascent’s Nov 15, 2016 Emissions Inventory, some significant info was obscured (applies also to Table 4):

- “Commercial energy” is no longer specified as building energy, blurring focus on appropriate mitigation measures.
- The first four sectors were earlier grouped under “Building Total” and “Transportation Total” headings, and the list was sorted as such. Absent these grouping in the present Table 1, the sorting order is unclear and the relative importance of the emission sectors, especially transportation and building energy, is less distinct.

We suggest the original Inventory organization be retained.

Table 2. It’s unclear why the projected increases in *Commercial Energy* and *Off-Road Vehicles* is so out-of-line with other sectors.

Table 3. Since SMUD’s Climate Emergency Declaration is not legislative or otherwise enforceable, its projected contribution to achieving the 2030 reductions shown in Table 4 should be shown, and its reductions included in the Adjusted BAU only insofar as substantial evidence demonstrates SMUD’s 2030 goal will be met.

Table 5. Please explain basis of “Adjusted Scoping Plan Emissions Limit”; i.e., addition of ‘Electric Power’ sector, and deletion of ‘High-GWP Gases’, ‘Wastewater’, and ‘Water Related’ sectors. Also, should metric for this item be MMTCO_{2e}?

Table 8 and 9 Organization. Because of the large numbers of measures presented in the CAP, the public reading audience might be unable to “see the forest for the trees”, potentially reducing the quality and quantity of public input. The organizational scheme of these tables does not adequately remedy this problem. Also this preliminary version of the tables does not display important information. We suggest:

- **Add implementation-related information.** In addition to categorizing measures as qualitative or not, please identify for each measure: implementing agency; whether a County or BAU action; and whether enforceable or voluntary.
- **Organize measures by GHG sectors.** The current strategy categories present two interrelated difficulties:
 - 1) The categories are disconnected from the emission sector framework established in the GHG Inventory, e.g., Table 1. Tables 8 and 9 for unclear reasons superimpose an unrelated and less apparently logical scheme, blurring the crucial relationship between the sectors and their mitigation measures.

We suggest using the emission sectors as the organizing principal, with appropriate subheadings, e.g., for the *On-Road Vehicle* sector, subheads: ‘EV’s’, ‘Transit’, ‘Active

Transportation', Smart Growth, etc. Per attachment 1 to these comments, almost all the measures can easily be logically correlated with emission sectors. The few exceptions include NWL-03, GRN-10, INC-03, and INC-05, which among them relate to Adaptation, Outreach, and Coordination.

- 2) The categories are un-descriptive and incoherent in their application in many cases, e.g.,
- Generic titles like 'Clean Energy Strategy' and 'Inclusive Community Planning' fail to convey an idea of what they encompass.
 - .Measure which are similar, overlapping, or would often be implemented together are presented separately with no indication of their relationship, e.g., CLS-05 and CLV-01, electrifying ag equipment ; VMT-05 and VMT-09, improving pedestrian and bikeways; VMT-04 and VMT-10, improving transit stop access,
 - Table 8's, 'Clean Energy Strategy', and Table 9's 'Inclusive Community Planning' and 'Natural and Working Lands' each include measures unrelated to each other by sector, type of mitigation, or any other readily discernable characteristic. In the case of Table 9's 'Natural and Working Lands', only one of its seven measures, NWL-04, bears an apparent relationship to the category title (but problematically, see below).

Measure-specific comments. We are not offering a measure-specific review of this preliminary document, but note four apparently problematic measures:

- NWL-01, South Sacramento Habitat Conservation Plan. As noted at stakeholder meeting #4, this measure needs further substantiation, because the HCP allows development, with loss of natural sequestration, on lands which would otherwise remain carbon sinks.
- CLV-10, Improved Fuel Efficiency Standards. This is a non-quantified measure; nevertheless, absent substantiating information, the connection between the County's lobbying presence and the adoption of improved fuel efficiency standards is so tenuous as to make this measure seem speculative. We suggest culling this and similarly uncertain measures to increase focus on more promising approaches.
- NWL-01, Urban Forest. The sequestration potential of urban forestry is beneficial, but its most valuable benefit is in reducing the urban heat island effect.
- NWL-04, Connected Open Space System. This non-quantified measure would, "*Ensure that new development increases connections and removes barriers to open space, and increases green and open spaces*". As formulated this measure is difficult to parse because development usually diminishes open space and habitat/landscape connectivity. We suggest it be clarified or removed.

Thank you again for inviting this early input.

Sincerely,



Oscar Balaguer, Co-Chair
350 Sac CAP Team

CORRELATION OF MITIGATION MEASURES TO EMISSION SECTORS
 – SEE COL 1 NOTATIONS --

TABLE 8	
Measure	Measure Name
CLS-01 Cmmcl Bldg	Increase Energy Efficiency in New Commercial Buildings
CLS-02 Solid Waste	Increase Organic Waste Diversion
CLS-05 Ag	Electric Irrigation Pumps
CLV-01 Ag	Electric Agricultural Equipment
CLV-02 On-road	Electric Vehicle Infrastructure Program
CLV-03 Off-road	Tier 4 Final Construction Equipment
CLV-04 Off road	Electric or Alternatively-Fueled Construction Equipment
CLV-05 Ag	Tier 4 Final Agricultural Equipment
GRN-01 Res Bldg	Energy Efficiency and Electrification of Existing Residential Buildings
GRN-02 Hi GHG	Limit Refrigerants in Stationary Air Conditioning with a GWP Greater than 750
GRN-03 Res Bldg	Eliminate Fossil Fuel Consumption in New Residential Buildings
GRN-04 Cmmcl Res	Energy Efficiency and Electrification of Existing Nonresidential Buildings
GRN-05 Bldg	Residential Energy Conservation Education and Training
GRN-07 Cmmcl Bldg	Commercial Energy Conservation Education and Training
NWL-01 Seq	South Sacramento Habitat Conservation Plan

NWL-03 Adapt	Urban Forest
NWL-06 Ag	Carbon Farming
VMT-01 On-road	Reduce Vehicle Miles Traveled from New Development
VMT-02 On-road	Transportation System Management Plan
VMT-03 On-road	Minimum Parking Standards
VMT-04 On-road	Improved Transit Access
VMT-05 On- d	Improved Pedestrian Network and Facilities
VMT-06 On-road	Traffic Calming Measures
VMT-07 On-road	Park-and-Ride Lots
VMT-08 On-road	Unbundle Parking Costs
VMT-09 On-road	Improved Bicycle Network and Facilities
VMT-10 On-road	Connections to Transit Stops

TABLE 9	
Measure Number	Measure Name
Clean Energy	
CLS-03 Res Bldg	SMUD Greenergy – Residential
CLS-04 Cmmcl Bldg	SMUD Greenergy - Commercial
CLS-07 Hi GHG	Promote energy generation, flaring, and methane capture
Clean Vehicles and Equipment	

CLV-06 Cmmcl/Res Bldg	Electric Landscaping Equipment
CLV-07 On-road	Electric School Buses
CLV-08 Cmmcl Bldg	Electrify Loading Docks
CLV-09 On-road	Improved Fuel Efficiency Standards
CLV-10 On-road	EV Ride Sharing at Affordable Housing
CLV-11 On-road	EV Parking Code
CLV-12 On-road	EV Signage
Green Buildings	
GRN-06 Cmmcl/Res Bldg	Drought Tolerant Landscaping
GRN-09 Cmmcl Bldg	Existing Structure Reuse
GRN-10 Adapt	Reduce Urban Heat Island Effect
GRN-11 Water- related	Expedite, Reduce, Exempt Permits
GRN-12 Water	River-Friendly Landscaping
GRN-13 Water	Rain Capture
GRN-14 Water	Low Impact Development

GRN-15 Water	Water Conservation Regulations
Inclusive Community Planning	
INC-02 On-road	Urban-Rural Agricultural Connections
INC-03 Outreach	Sustainability for All
INC-04 On-road	Jobs Housing Balance
INC-05 Coord	Regional Climate Action Coordination
INC-06 On road	Civic Lab
INC-07 Outreach	Green Job Training
Natural and Working Lands	
NWL-04 ?	Connected Open Space System
NWL-05 On-road	Smart Growth
VMT-11 On-road	Increased Vehicle Occupancy
VMT-12 On-road	Secure Bike Storage Facilities
VMT-13 On-road	Safe Routes to School
VMT-14 LU	Update Community and Corridor Plans
VMT-15 On-road	Connecting Key Destinations