



January 18, 2021

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Via email

Dear Todd,

SAC CO CAP, ADMIN DRAFT: COMMENT

Thank you for opportunity to review the administrative draft CAP (CAP). 350 has previously commented on the preliminary CAP documents in our letters of June 16, September 25, and November 29, 2020, and a number of our earlier concerns remain outstanding

Our current comments are bulleted below, organized by CAP section.

1.1 CLIMATE ACTION PLAN OVERVIEW

- Danger of Climate Change/Urgency of Action. The opening paragraph describing the threat of climate change is accurate but inadequate, because too general to convey the actual effect on County residents. This is a serious deficiency because public support will be needed to adopt and implement a plan commensurate with the threat. Please expand this section to include:
 - Current scientific consensus on urgent need to substantially reduce GHG emissions in this decade to avoid seriously disruptive temperature increase of 1.5 °C. or more by 2050 (IPCC, 2018).
 - Currently available information, of which there is much, to provide members of the public and decision-makers a clear idea of the health and economic dangers of unmitigated climate change, to include:
 - Projected temperature extremes (in addition to, and more significant than, average temperature increase), and changed magnitude and duration of heat waves compared to historic.
 - Expected health effects of such extremes, including on vulnerable populations, correlating projected temperature and air quality impacts with specific health consequences.
 - Expected increased incidence of wildfires and flooding, and associated air quality, public health, and economic impacts if GHG emission are not sharply reduced this decade.
 - Expected impacts on food crops, food security, and agricultural economy.

1.2 WHAT IS CLIMATE CHANGE?

- This paragraph unaccountably understates the threat of climate change, which is a serious deficiency given the role of the CAP in mobilizing climate “action”.
 - Climate change is not merely *significant*, it threatens disaster and is thus *dire*.
 - That climate change is caused by natural causes is not merely *unlikely*, but *highly unlikely* (as noted in Figure 1-1’s caption).
 - Human activity is not merely *contributing* to climate change; in time scales relevant to the CAP it is entirely *responsible* for it (again, as noted in Figure 1-1’s caption).
- The description of the GHG effect is also somewhat muddled. GHG’s do not “*reflect... Earth’s visible light and infrared radiation*”; they absorb the heat energy of infrared radiating from the Earth’s surface. While these inaccuracies are irrelevant to the CAP’s practical application, mis-stating the basic physics tends to undermine the credibility of the document as a whole.

1.6 SUMMARY OF PUBLIC INVOLVEMENT

- Please see our comments below at CAP Section 6.2.1, *Climate Emergency Declaration*, re public-involvement.

2.2 GHG INVENTORY

The CAP states, “... *data becomes available for more recent years, the County will prepare updated emissions inventories.... nventories were prepared ... using a baseline year of 2015, for which the best available regionwide data was available*”.

Please,

- Correlate this statement with the GP FEIR/GP’s commitment to triennial Inventory updates.
- Clarify how, “*data becomes available for more recent years*”; and the nature and duration of delays in obtaining data for a given base year.
- Clarify the implied variability of data quality from year to year; why 2015 data were superior; and implications for future updates.
- Indicate when the County plans to issue its next GHG Inventory update, and for what base-year.

2.3.1 BUSINESS-AS-USUAL FORECASTS – LEGISLATIVE REDUCTIONS

- Assumptions. Please display assumptions and calculations used to derive projected GHG reductions from each of the seven cited programs factored into the CAP’s legislative-adjusted BAU forecast, in a form understandable to the general public and decision-makers..
- SMUD 2030 Goal. SMUD’s 2030 carbon-zero goal is not legislation and does not present a legislative level of implementation certainty. For streamlining purposes, achievement of SMUD’s 2030 carbon-zero goal should be assumed only insofar as supported by substantial evidence.

County Focus The CAP states, “*The legislative-adjusted BAU forecast scenarios provide the County with the information needed to focus efforts on certain emissions sectors and sources....*”

- Please explain how the adjusted BAU has helped the County focus its own efforts on CAP Section 3 mitigation measures.

2.4.1 COMMUNITY TARGETS

The CAP states, “... a proportional per capita target for the CAP was developed that would be achieved in 2030 consistent with the State’s goal ... [applied] to the sectors included in County’s GHG emissions inventory... results in an emissions of 4.8...”

- Please describe the derivation of the County’s per capita target in a way understandable to members of the public and decision-makers not involved in developing it.

The CAP states, “...the County has elected to go above and beyond ... the State’s... 2030 target [and] has chosen a more stringent per capita target of 4.0 MT”.

- Please see below target-related comments at CAP Section 6.2.1, *Climate Emergency Declaration*.
- Please explain basis for selecting the particular more stringent target.

2.4.2 MUNICIPAL TARGETS

The CAP states, “...the State emitted ... in 2015, an increase of 2 percent over 1990 levels. Consequently, to reach 40 percent below 1990 levels, 2015 levels would have to be reduced by 40 percent.”

- Please clarify in a way understandable to someone not involved in developing the calculations, e.g., if appropriate with a reference to SB 32 goal, and a statement that the 2 percent increase is disregarded as de minimus.

3.3 COMMUNITYWIDE GREENHOUSE GAS REDUCTION MEASURES

- Assumptions. Please display assumptions and calculations used to derive projected GHG reductions from each of the quantified measures, in a form understandable to the general public and decision-makers (i.e., not simply CalEEMod or other printouts).
- Measure Credibility. A number of the 58 proposed management measures are not credible because they,
 - are described ambiguously or in aspirational terms
 - defer formulation of mitigation
 - do not clearly specify enforcement or other means of assuring implementation
 - do not identify costs and funding
 - proposes partnership or collaboration with uncertain effect;
 - and/or do not include or clearly commit to a schedule of performance.
- Land Use. Land use choices are directly within the County’s authority and are closely correlated with VMT, which is the County’s major GHG emissions source. We continue to encourage the County to consider LU-related programmatic measures, including:
 - GP Policies LU-119 and LU-120, which facilitate “leapfrog” development and associated VMT/GHG impacts.
 - Entitlement of three times as much potential housing as projected County growth can absorb, likely resulting in widely-scattered, partially built-out tracts, with associated VMT/GHG impacts.
- Carbon Offsets. The County anticipates that development projects not wishing or able to reduce VMT-related impacts to State/SMAQMD standards may offset excess GHG emissions through purchase of carbon credits assuring equivalent off-site prevention of emissions or sequestration of atmospheric carbon. The CAP should document the conditions under which

carbon offsets can be applied and should specify that offset projects must be located within County boundaries, in order to:

- Keep the money local. e.g. funding investment in historically disadvantaged neighborhoods for electrification, energy efficiency, urban greening, pedestrian/bike friendly streets, transit improvements and other climate adaptation improvements.
- Locally realize co-benefits, such as those identified in CAP section 1.5.
- Capture for the County's own economy the economic value and multiplier effect of investment in neighborhood improvement.

4. MUNICIPAL GREENHOUSE GAS REDUCTION STRATEGIES AND MEASURES

- "Municipal", per dictionary definitions, commonly refers to city or town governance and is confusing in this context. The County's 2012 *Climate Action Plan – Government Operations* is clearly titled, and we suggest that this section, which would update the Operations CAP, be named similarly.
- We reserve substantive comment on the County operations measures.

5. CLIMATE CHANGE VULNERABILITY AND ADAPTATION

- We reserve comment on the vulnerability and adaptation measures.

6.2 IMPLEMENTATION STRATEGY

- This section describes an implementation strategy, without however presenting one. It lacks:
 - Identification of needed resources
 - Identification of proposed funding
 - Schedule of actions (target dates do not address this need)
 - A monitoring plan
 - A plan for reporting to the public and decision-makers, including frequency and a description of report contents
 - A schedule of CAP and GHG Inventory updates
 - Identification of CAP management responsibility, assigned to a staff position senior enough to assure timely implementation across the many involved County departments.
- This section does not reflect the County's GP commitments to triennial Inventory updates and to, "*Enact and fund a Sustainability Program to provide ongoing oversight, monitoring and maintenance of the Climate Action Plan, including: ... updates to the GHG emissions inventory and [CAP].... The County shall develop sustainable funding sources for this Program ..., which may include a fee assessed for development projects*".

6.2.1 CLIMATE EMERGENCY DECLARATION (CED)

This section presents a somewhat lengthy discussion of the County's December 16, 2020 CED without substantively responding to any of its direction, and the CAP as a whole does not reflect the sense of urgency conveyed in the CED's Resolves:

First Resolve: *“Supervisors ... declare climate change emergency requiring urgent and immediate mobilization ... and transition to a countywide carbon neutrality footprint by 2030”.*

- The 2030 carbon-neutral goal is not discussed anywhere in the CAP.
- The CAP does not identify any measures for “urgent and immediate” early action.

Second Resolve: *“the County ... commits to build on existing climate action commitments and ... short term ... carbon elimination ... to eliminate emissions by 2030 ... through regional collaboration...”.*

No “short-term... carbon elimination” measures are identified in the CAP.

Third Resolve: *“the ... [CAP] shall explain the County’s approach to ... carbon neutrality by 2030, building on recommendations and analysis from community partners, ... climate experts, urban and regional planners, community members, and economists...”*

- The 2030 carbon-neutral goal is not discussed in the CAP.
- The CAP neither demonstrates the broad consultation with expert advice that this policy directs or identifies a process to obtain it going forward.

Fourth Resolve: *“County staff shall evaluate the resources necessary to achieve carbon neutrality by 2030 ... [and] shall identify [funding] gaps and provide recommendations “*

- The CAP does not identify “resources necessary”, “funding gaps”, or associated “recommendations”.

Fifth Resolve: *“The County ... will establish, within 60 days, a ... Task Force composed of climate experts ... to oversee ... development and implementation of a climate ... plan utilized by all [County] departments ..., and each department shall ...provide regular updates ... concerning ... progress in reducing emissions “.*

- The CAP does not discuss such a Task Force or its establishment, including a proposed administrative framework, scheduling issues, or explanation of how the specified plan will relate to the existing 2012 *County Operations CAP*, proposed for update in this CAP.

Sixth Resolve: *“it is vital that farmers ... be supported ... in necessary conservation and regenerative practices that will reduce emissions and improve resilience....”*

- Any mitigation measures addressing this policy direction should be referenced in this section of the CAP.

Seventh Resolve: *“... the community ... need[s] to understand, participate and support ... [climate related] actions ... the County ... [will] support outreach ... on need and ... policies and strategies.... [engaging] ... grassroots organizations... economic development partners, ... low-income and disadvantaged communities, youth, communities of color, and environmental justice “.*

This policy direction is further informed by the CED’s fourth Whereas: *“the scope and scale of action necessary to stabilize the climate will require unprecedented levels of public awareness, engagement, and deliberation to develop and implement effective, just, and equitable policies to address the climate crisis”.*

- CAP Table 1.1 provides a summary of public involvement for the CAP to-date. The described public outreach falls well short of both the level of public involvement directed in the CED, and that is being provided for comparable other (arguably less critical) County plans, e.g.,
 - *Re-Envision West Arden Arcade Plan*,
 - *Active Transportation Plan Update*.

Both these planning efforts are concurrent with the CAP and of similar duration. During 2020 both had substantial outreach to the general public (10-11 hours each); whereas the CAP had none. This disparity is scheduled to continue in 2021, with substantial interactive outreach identified for the other two plans; the CAP has none other than formal hearings

- Table 1.1 identifies four public CAP workshops presented in 2016 and early 2017 and a May 2017 Board workshop. These events four years-ago and before any CAP documents had been produced do not provide adequate public involvement for the 2021 plan. In the intervening years Sacramento residents have observed and experienced with increasing public concern global, national, and local:
 - record-breaking hot years and heat spells,
 - extreme weather disasters, including floods, storms, and drought,
 - associated loss of lives and property due to unprecedented fires associated with climate change,
 - fire-related unhealthy air quality of severity and duration never before experienced.
- Table 1.1 also identifies numerous focused stakeholder meetings. Interest group meetings are valuable, but do not replace broad-based outreach to the affected general public, whose buy-in is essential for effective climate action.

Eighth Resolve: *“the County shall ... support ... regional agencies and associations as well as ... environmental and social justice member organizations”.*

- Any mitigation measures addressing this requirement should be referenced in this section.

We hope these comments will help the County to respond effectively to the challenges of climate change and look forward to providing further input CAP on future drafts.

Sincerely,



Oscar Balaguer, 350 representative,
County CAP Stakeholder Group

Cc: John Lundgren
Todd Taylor