Staff Public Comment,

The current Climate Action Plan needs a stronger vision for a livable future!

Here are the four factors that are holding us back:

- 1.) unreliable measures,
- 2.) the county's sprawl,
- 3.) the lack of a full CEQA analysis,
- 4.) and GHG streamlining.

Our future is in your hands. Please take the necessary action.

-- Richard Groh Third Act (Sacramento)

Richard Groh RichardGroh@gmail.com 3050 St Helena Hwy N Saint Helena,, California 94574

Staff Public Comment,

My name is Joel Leong, and I live in Sacramento County. I am writing to share that the current Climate Action Plan needs to be improved. We need a good, visionary CAP to set the direction for a livable future!

The four factors that make this CAP ineffective are:

1) Vague, unenforceable, and/or unfunded measures;

2) Support for massive high-GHG sprawl development, rather than feasible infill;

3) Lack of environmental analysis, instead claiming a 2011 analysis done before the CAP existed is adequate;

4) CEQA-streamlining function, meaning future development will avoid further GHG-impact analysis and only need to comply with the CAP's measures, no matter how weak.

Our future is in your hands, and we want action. Thank you!

Joel Leong joel-h-leong@sbcglobal.net 270 Vista Creek Circle Sacramento, California 95835

Staff Public Comment,

My name is Sheyenne Forbes and I live in Sacramento County. I am writing to share that the current Climate Action Plan needs to be improved. We need a good, visionary CAP to set the direction for a livable future! The four factors that are holding us from achieving that goal are: unreliable measures, the county's sprawl, the lack of a full CEQA analysis, and GHG streamlining.

Our future is in your hands, and we want action. Thank you!

Sheyenne Forbes shyforbes@gmail.com 1317 17th street, apt 1 Sacramento , California 95811

#### Staff Public Comment,

The draft CAP is a problem. Please do not approve this draft plan, with its inadequate mitigation policies and projects nor its delayed timetable. I and many of our neighbors are residents of Arden Arcade and we live along the Sierra Branch of the Strong Ranch Slough, the Strong Ranch Slough, or Chicken Ranch Slough. We are subject to flooding now (2017 the latest) with 2" in 12 hours of rain. Storm water runoff and decreased porous surface area from new construction floods lower neighbors, and times when the American River is capacity the river pumps are turned off creating significant flooding and back flow. New residents buy homes without a mandatory history of disclosure of past flooding in their title reports. Flood plain and water retention areas are not significantly protected and diminishing. Road culverts are inadequate and create dams of debris so roads flood and not usable. We are concerned that this CAP does not have significant mitigation projects planned righ t now to deal with the present nor the projected future severe flooding for the Sacramento Area. This draft CAP plan puts off dealing with the reality that Climate Change needs prompt action.

Ann Kohl kohlvista@gmail.com 2710 Sierra Blvd. Sacramento, California 95864

Staff Public Comment,

Please take the steps needed to join the many dozens of communities in California that are moving forward with strong, clear and comprehensive climate action plans. This is the only way to move our community forward toward a resilient and sustainable future.

The consequences of inaction are dire, as without a groundswell of bold and aggressive action we will all be responsible for the business, economic, and social negative impacts that will occur. Your constituents are looking for strong, thoughtful and clear leadership, and leaders with the courage to move ahead. In the past it may have seemed that inaction was the 'safe and conservative' play; that's no longer the case due to the simple fact that climate deterioration is already clearly underway. Kicking the can down the road would not be responsible, wise, or safe.

Respectfully submitted Michael F. Malinowski Architect, Principal Applied Architecture Inc.

Michael Malinowski mfm@appliedarts.net 2550 X Street Sacramento, California 95818

Staff Public Comment,

The proposed plan does not do enough to mitigate even the CO2 currently in "the pipeline". We must have a plan that is technically sound; that not only curbs future emissions, but also addresses the level of pollution already causing climate disasters, such as fires & floods. This will not happen by "privatizing" the problem: We know this ends up being more expensive and less accountable than work designed & overseen by government agencies. Get serious. We can no longer afford to "kick the can down the road" -- leaving worse problems for our children & grandchildren.

Respectfully, Edwina White

Edwina White edwinawhite88@gmail.com 1410 Q St, Apt. G Sacramento, California 95811

Staff Public Comment,

My name is Michael Dack and I live in Sacramento County. I am writing to share that the current Climate Action Plan needs to be improved. We need a good, visionary CAP to set the direction for a livable future! The four factors that are holding us from achieving that goal are: unreliable measures, the county's sprawl, the lack of a full CEQA analysis, and GHG streamlining.

Our future is in your hands, and we want action. Thank you!

Michael Dack mbdack@gmail.com 3334 Union Springs Way Sacramento, California 95827

Staff Public Comment,

My name is Cynthia Shallit and I live in Sacramento County. I am writing to share that the current Climate Action Plan needs to be improved. We need a good, visionary CAP to set the direction for a livable future!

I appreciate and applaud the County staff for the extensive amount of work, time and effort they have put into improving the County's Climate Action Plan. I am disappointed that the proposed measures do not significantly reduce the County's carbon emissions by 2030.

I did not see many of the original suggestions made by the SacEV Assoc. incorporated in the revised draft, but we were gratified to see that the County significantly increased its Implementation Target for fast chargers for electric vehicles. Thank you.

However, I particularly would like to point out that the 2030 forecast shows the largest source of emissions by far, is "on-road vehicles" to the tune of 57% of total community GHG emissions and 43% of total government operation emissions. (See Table 1). Yet, even though cars are the largest source of emissions, very little is being done to switch gas cars to electric.

I think that focusing more on trying to get both employees within the County and the community at large to switch to electric vehicles is going to have the most dramatic effect, at the least cost and in the fastest timeframe than any of the other actions you are proposing. There are over a million gas-fueled vehicles in Sacramento.

Though I support and encourage and want you to continue all the active transportation projects you are proposing-more public transit, bike trails, transit-oriented housing, less sprawl, etc. It is easier and faster to transition those gas fueled cars to electric cars than it is to get a million people to give up their cars altogether or even reduce miles traveled. This was not always true, but the fast innovation in electric cars now has given us a higher level of model choice, travel charging range, and financial incentives than ever before. (It would be helpful to have the board members themselves drive electric vehicles to model that preference to the public.)

What is key to accelerating this transition is, perhaps a new role for the County, but a relatively inexpensive one and that is to have a specific marketing, education, incentive and outreach program for both employees and the wider community. We provided more detail in our comments specifically on GOV -EC-01.

The Sacramento Electric Vehicle Association would be glad to help the County develop a robust and effective program.

Our future is in your hands, and I want action. Thank you!

Cynthia Shallit CYNTHIASHALLIT@GMAIL.COM 1423 8TH AVE Sacramento Indivisible, California 95818

Staff Public Comment,

Make change

Barbara Ray bray@hotmail.com 6344slipperyncreeklane Citrus height , California 95621

Staff Public Comment,

My name is Rick Sansone and I am writing regarding the current Sac Co CAP. The plan has few measurable goals, allows for too much sprawl and lacks CEQA analysis.

Vote no on this plan and go to work on one that will better serve Sac county voters.

**Rick Sansone** 

Rick Sansone carmrick52@gmail.com 5005 Raleigh Way Carmichael, California 95608

The current plan does not commit to actions that contribute to our survival. Please have the courage and moral backbone to do the right thing and resist more sprawl. Andy Bein

Andrew Bein dbtwr@andrewbein.org 2241 4th Avenue Sacramento, California 95818

Pease make sure measurement is enforceable. They are too vague now

Barbara O' Connor baoc@csus.edu 410 Ross Way Sacramento, California 95864

Dear supervisors

I find the present CAP proposal to be completely inadequate because it does not really take into account the present climate emergency. The CAP is vague, unenforcible, underresearched, favors sprawl development that is a driver of climate change, and makes no provisions for further review over time.

Please do not approve this fatally flawed proposal. We need a real climate action plan. Milton Kalish, Davis CA

75milton kalish milton@miltonkalish.com 975 Zaragoza St Davis , California 95618

From:	Erin Teague
To:	PER. climateactionplan
Cc:	Smith. Todd; Derek Catron
Subject:	SAR Comment Letter on Final CAP
Date:	Thursday, September 22, 2022 3:59:26 PM
Attachments:	2022 0920 SAR CountyCAPLetter GHG-06.pdf

Please see attached comment letter from the Sacramento Association of REALTORS.

Please let me know if there is any additional information I can provide.

Erin L. Teague Government Affairs Director Sacramento Association of REALTORS® 2003 Howe Avenue, Sacramento, CA 95825 Email: <u>eteague@sacrealtor.org</u>



September 19, 2022

R

Supervisor Don Nottoli Chair, Sacramento County Board of Supervisors 827 7th Street, Room 225 Sacramento, CA 95814

RE: Sacramento County Climate Action Plan - Measure GHG-06 Energy Efficiency and Electrification of Existing Residential Buildings

On behalf of the Sacramento Association of REALTORS<sup>®</sup> (SAR) and our 8,000+ members, we value the opportunity to provide additional comments on the Sacramento County Climate Action Plan (CAP) Final Draft. We are grateful for our collaboration with staff and other stakeholders on this topic, and we look forward to participating as this conversation continues.

We appreciate the incorporation of our previous comments that provide more specific timelines, clarity, and the incorporation of the cost-effectiveness studies in Measure GHG-06. We cannot stress enough that no matter how well intended the goals to electrify existing residential buildings, there will be considerable costs that will be shifted to homeowners as the Climate Action Plan measures are implemented.

We ask that the cost-effective study incorporate costs and focuses on the regions aging housing stock, especially for homes built before 1978. Additionally, timing and availability of technology and space are important factors. For example, when a homeowner's water heater goes out and needs to be replaced, it is often a project that can be completed in 24 hours. However, installing an electric heat pump is a process that can take 1-2 weeks in the best of circumstances. The new process now involves plumbing and electrical trades and can even mean new space requirements and placement in the home. For these reasons, we encourage you to consider an education program along with incentives, so residents have time to plan for larger-scale projects before appliances break down.

We also want to stress the importance of programs and incentives that are going to help homeowners who are not in position to afford or finance these changes when their appliances need to be replaced. The average Sacramento homeowner can expect to pay between \$26,000 and \$27,000 to convert their existing home to all-electric heating, cooling, and appliance systems. When these costs are compared to a home's value, it can be seen as a highly regressive policy. For well-to-do homeowners, the cost is 3-4% of the home's total value. But for the thousands of people who own a median-priced home in Sacramento, the cost is two to three times greater (11-14% of the home's total value).

Each year, hundreds of Sacramento homeowners retrofit their homes to all electric appliances and systems without any government-imposed requirement. They receive utility rebates that range from

several hundred to several thousand dollars. These are the residents we want to help to continue to help shift the markets and create the pathways to make this process easier. We are always willing to engage as our members often work with their clients on long-term home projects and cost projections to help partner in the communication and education of the new regulations.

Please keep in mind that as we approach all requirements, we want to ensure we are not further creating barriers for homeowners who wish to make greenhouse-reducing upgrades and help provide options to incrementally make these upgrades for those who cannot afford to do so all at once especially as it relates to permit programs. Any permit program that makes upgrades and retrofits costly, burdensome, or the expense of the new technology creates a whole new issue of non-compliance by homeowners who avoid the permitting program entirely.

We understand the enormous pressure on local jurisdictions to reduce GHG rates. Still, we should note that if Sacramento County is the only area in our region that implements these strict reach codes, you could be putting home values in the unincorporated county at an unfair market advantage over those outside the area. Instead, Sacramento County should be working with the State for action that phases out gas appliances throughout California. Without a statewide strategy, there will be confusion in the region about what rules apply to which areas, or even more concerning, lower marketability of properties in Sacramento County versus other areas in the region.

We hope to continue to be part of this critical conversation as a stakeholder in Sacramento County. We look forward to collaborating closely with staff as the Climate Action Plan moves into implementation. Please contact Erin Teague with any questions at <u>eteague@sacrealtor.org</u>.

Thank you for your consideration,

En L. Teague

R

Erin Teague Government Affairs Director Sacramento Association of REALTORS<sup>®</sup>

cc: County Supervisor Frost County Supervisor Desmond County Supervisor Kennedy County Supervisor Serna Todd Smith, Sacramento County Planning



From:	Muriel Strand
To:	PER. climateactionplan
Subject:	Comments on Sacramento County"s Final CAP
Date:	Thursday, September 22, 2022 4:08:08 PM
Attachments:	BOS CAP comments march 23.pdf

#### To Whom It May Concern:

It appears that the county's plan is mostly about infill and electrifying everything with the assumption that we can graft our fossil fuel lifestyles onto PVs, windmills, and batteries. That solution depends on fossil fuel energy for manufacturing, and on resources that are far from local.

We need local solutions, and relocalization. Where will Sacramentans' potable water, healthy food, and affordable sustainable housing come from and how will it get here? We need affordability, for homeless folks and also for the climate refugees who will be arriving sooner than we might wish.

One specific affordability challenge is heat pumps. A good friend installed a summer-winter heat pump recently, and after a while something broke. It turned out that she had to use a specific approved repair person, and that the replacement part was very expensive and took a while to arrive. Fortunately she could afford it. There's also the potential for leakage from improper installation of more than a few of these thousands or millions of new units.

In general, I don't believe the proposed plan will work as hoped. So I refer you again to my comments of March 23 (attached), on the occasion of the Board of Supervisors' hearing on a previous draft.

Here is more information about the problems which can be expected:

1. this interview summarizes the 2 reports https://www.thegreatsimplification.com/episode/19-simon-michaux

2. https://tupa.gtk.fi/raportti/arkisto/16\_2021.pdf

3. https://mcusercontent.com/72459de8ffe7657f347608c49/files/be87ecb0-46b0-9c31-886a-6202ba5a9b63/Assessment to phase out fossil fuels Summarv.pdf

Wisdom bids us remove our whole society from its temporary fossil fuel foundation and re-place it on a totally biological foundation. As usual, the devil's in the details.

Since I don't expect the plan to include the kind of fundamental changes I believe are necessary, I ask that the plan and implementation provide support for those Sacramentans who do want to live in a radically different way, with a lifestyle that is completely based on a biological foundation with no (or only transitional) input from fossil fuel energy. Such support will make the inevitable arrival of climate refugees easier for everyone.

Remember, biology works for free whenever plants and animals have the necessary sun, water, and soil to live and grow the way they have been doing for much longer than homo sap has been around.

For example, ruminants are self-reproducing, mowing, irrigating, fertilizing, food-producing members of sustainable farms. It's human cluelessness that sticks them in CAFOs where problems arise.

A related conundrum is that the most powerful forms of carbon sequestration are biological, such as agroecology and reforestation, but they are very difficult to measure precisely so they don't fit well with the carbon-zero reduction calculations required by regulations.

These essays outline what such a radical plan could look like: https://www.researchgate.net/publication/256048802 Sustainable Investment Means Energy Independence From Fossil Fuels

and

https://www.researchgate.net/publication/333581837 Is it true that 'Small Is Beautiful'

Thanks for the opportunity to comment.

Muriel Strand, P.E.

Advertising is a private tax.

- Andre Schiffrin

Good science and financial profit are mutually exclusive. - me

www.nisenan.org/ www.bio-paradigm.blogspot.com/ www.work4sustenance.blogspot.com https://www.researchgate.net/profile/Muriel-Strand/publications

	March 23, 2022
To:	Sacramento County Board of Supervisors
From:	Muriel Strand, P.E.
Re:	March 23 Agenda Item #3
	Workshop on Sacramento County Draft Climate Action Plan

I have been generally following various planning processes on the local and state level as we confront the realities of approaching climate chaos. It appears to me that most people who are not climate deniers think that we can graft our fossil fuel lifestyles onto PVs, windmills, and batteries. I don't agree.

While it may be possible for California to succeed in doing so, it just does not scale nationally, let alone globally. It's also a solution that's not really affordable for many essential workers, for the homeless, nor for the climate refugees we can expect to arrive in the coming years.

So I have spent considerable time attempting to discern and outline a vision for fundamental and radical change. One example that would offer everyone an easy way to begin practicing such changes would be to ban leafblowers and then all landscaping equipment that uses engines or motors to accomplish tasks that are well within human muscular capability: http://motherearthhome.blogspot.com/

The county's Draft CAP refers to the 2017 scoping plan developed by the California Air Resources Board, pursuant to AB32. As it happens, I have been following and commenting on the series of workshops organized to gather public input on various aspects of the 2022 scoping plan on how California will achieve the netzero goals approved by the Legislature. https://ww2.arb.ca.gov/our-work/programs/ab-32-climate-change-scoping-plan/scoping-plan-meetings-workshops?utm\_medium=email&utm\_source=govdelivery

It appears to me that the 2022 plan will be noticeably more ambitious than the 2017 plan, motivated by the increasingly dire predictions coming from the IPCC and elsewhere. So I recommend that county planning staff consider reviewing the draft 2022 scoping plan which will be presented to their Board in the next few months, before finalizing Sacramento County's CAP. In my comments, I have presented a variety of ideas and information outlining an alternative perspective that's about adjusting our lifestyles so as to graft them onto the natural world and the ecology that we absolutely depend on. My various comments over the past months are available via: <u>https://www.arb.ca.gov/lists/com-attach/8-</u> sp22-publichealth-ws-WyhTNII8WXoHaFQ6.pdf

# A few highlights:

1. About 25 years ago, I calculated that **fossil fuel energy is very cheap.** It takes about 100 hours for a healthy adult to generate, such as on a bicycle generator, the amount of energy available from a gallon of gasoline. Comparing the minimum wage to the price at the pump, that's a huge cost ratio, and very different than the conditions we were evolved to live in.

2. Fossil fuel energy is physical energy. Our physical needs are: clean air and water, healthy food, cooking, comfy shelter, and plenty of sleep and exercise. We would be wise to

plan how to meet those needs without fossil fuels as soon as possible. That means substituting humanpower and manual tools for engines and motors as soon and as much as possible. Current mining and refining technologies for key metals and minerals (including those required for manufacturing PVs, windmills, and batteries) require fossil fuels for key processes: https://www.youtube.com/watch?v=TFyTSiCXWEE

3. One strategy which I believe would be very effective in inducing substantial and speedy changes would be to require that all goods and services be priced in terms of embedded kwhr & GHG emissions, as well as in dollars. Economic theory posits that perfect consumer information leads to perfect markets and allocation. This kind of parallel-price market information would support consumers in making choices that would crowd climate-related externalities out of the monetary economy, in large part by making explicit the financial bias enjoyed by fossil fuels that is outlined in #1 above.

4. The sustainable discount rate is zero. Fossil fuels that are still in the ground are not stranded assets; they are assets whose real value is now negative but will be positive in a few centuries if we can figure out how to live within our means.

Thank you for the opportunity to comment.

**Dear Supervisors** 

I realize how people will pay attention to immediate concerns and postpone actions that impact future outcomes. In the case of climate change, procrastinating is no longer an option. Its effects are already being felt and further delays will only exasperate a catastrophe certain to occur. Fortunately, we still have the ability to take meaningful steps to alleviate the severity of climate change on our communities, and our children, who will be directly affected if we fail to act.

I believe the county's Climate Action Plan (CAP) is good fodder for public relations, but lacks meaningful components that must be incorporated if positive outcomes are to occur. First of all, the county must provide funds to enable the CAP to be implemented. Without being adequately funded, the CAP reverts to empty words on paper with no hope of limiting climate change impacts. The CAP must also include components to avoid further county sprawl by incorporating CEQA and GHG measures. Without these basic safeguards, the CAP as currently written could hasten the growth of climate change instead of reducing it.

Thank you for your attention to this very critical issue. Your actions - or lack of action - will not materialize overnight, but instead will be remembered by future generations. Our planet needs the commitment of those in power to take whatever steps they can to mitigate what scientists have universally concluded will occur if preventative steps are not adopted.

Such action needs to be taken now. Tomorrow will be too late.

Respectfully,

David Hawkins

David Hawkins ARTconsulting@hotmail.com 411 11th Street, #3 Sacramento, California 95814

My name is Francis Macias and I live in Rancho Cordova, California. I am writing to you today to tell you that the current Climate Action Plan is insufficient and does nothing to protect the people of Sacramento County.

I moved to Sacramento ten years ago and I was in love with how green this county was. I loved the rain, the trees, and the people. But times are changing. Our trees are dying from drought, and our people are sick from heat and pollution.

After experiencing intense heatwaves, smoke from wildfires, and never ending pollution from ICE vehicles, I am afraid to live here. Every morning, I wake up with anxiety over climate collapse and the role that Sacramento plays in climate destruction.

I am asking you to improve the vague, unenforceable, and unfunded measures of this climate action plan. I'm asking you to stop all plans for sprawl and development and to focus on infill plans. Furthermore, I am asking you to incentivize the use of public transportation. Another idea is to begin shutting down certain city blocks and making them available to foot traffic only.

The CAP also needs to address the lack of a full CEQA analysis, and GHG streamlining. Please strengthen our county Climate Action Plan today for a chance at a better tomorrow.

Thank you for your time.

Francis Macias francismacias@rocketmail.com 2701 Riesling Way Rancho Cordova, California 95670

From:	Jarrod Baniqued
To:	PER. climateactionplan
Subject:	Comment on Final Draft of Climate Action Plan
Date:	Thursday, September 22, 2022 6:55:28 PM

I am offering my endorsement of the Climate Action Plan for Sacramento County, with some reservations.

My support is for all the technical measures left unchanged from the Draft Plan from last winter. I praise the writers for their excellent work especially on the transport, urban forest, and building energy efficiency measures and the creation of the Emergency Task Force. They are, altogether, a strong start for any Climate Action Plan, and I fully agree that these actions should be taken within the timeframe of before 2030.

However, my reservations have the overall theme that the Final Draft is watered down from before. Please note that I do not know whether or not they were changed because the County is currently pursuing alternative legislative plans to better address them in detail, in addition to recent price shocks in energy. (For what it's worth, SMUD should explicitly commit to 100% clean energy by 2030.) Also, I am expressing my disappointment with the 2022 forecasts for GHG emissions reductions from the main environmental consulting firm cited throughout, which have decreased from the 2021 forecasts.

My reservations are that 1) the carbon farming plan is not detailed or ambitious enough now compared to earlier, and therefore should be more land dedicated to sustainable agriculture practices in including no-till farming and community food gardens by 2030; 2) the level of detail in the infill development measures is not high enough compared to the draft, and the funding mechanisms explained in the latter should be restored; 3) there should still be a carbon target, but it should be net negative by 2030; 4) the draft language on electrifying water pumps should be restored; 5) there is little coverage of green industrial tech including more widespread adoption of recycling, hydrogen fuel and electric arc furnaces; 6) there should be a greater emphasis on fully funding job training and apprenticeships in green-collar industries, especially given most of the building and mechanic trades' institutional lack of experience in heat pump installation and ZEVs, and 7) the status quo on transportation is unsustainable in that there does not appear to be enough language ensuring a boost in service frequencies on RT, and there are no calls to electrify the railways of the county. Perhaps the Board should consider working with SACOG to purchase rail rights of way and start new commuter rail services, including in rural areas.

Overall, the plan is not ambitious enough, but it's a strong start.

Jarrod Baniqued (JEH-ruhd buh-NEE-ked) he/him/his UC Davis Communications '21 Cell: (63) 917-656-5180 91 Consuelo Norte San Marcelino, Zambales, Philippines 2207 This climate action plan seems to me a waste of money that will further harm our economy based on some pretty sketchy assumptions about how much we affect the climate. As a refrigeration contractor, I can tell you the major ways to reduce energy use and waste are not encapsulated in the EPA's bans on refrigerants, but they have had a very costly impact on industry. Contractors have figured out how to make these laws pay, driving the cost of implementation even higher.

Bureaucrats will be bureaucrats.

Rick Bofinger Cell 916-825-8880 Office 916-925-0151 Fax 916-925-4179 Rick@JericoEnergy.com www.JericoEnergy.com Instead of facebook: http:Parler.com

Generating goodwill is good business. Goodwill builds trust, strengthens relationships, and creates a positive environment in which all parties profit.

The cleanest energy is the energy not used! ®

From:	Marco Antonio Quintero
To:	PER. climateactionplan
Date:	Thursday, September 22, 2022 7:59:53 PM

Yes

My name is Maureen Stubblefield. I moved from Napa Valley to Sacramento following the 2020 Glass fire. I care for my 2 year old grandson who is already suffering from the smoke and vehicle pollution in this city.

I am writing to share that the current Climate Action Plan needs to be improved. We need a good, visionary CAP to set the direction for a livable future! The four factors that are holding us from achieving that goal are: unreliable measures, the county's sprawl, the lack of a full CEQA analysis, and GHG streamlining.

Do you have people you love who are suffering from the inaction that has been ongoing? Please take this into consideration in the upcoming meeting and vote. We have no more time to dance around the climate chaos.

Maureen Stubblefield maureen.stubblefield@gmail.com 2778 Marty Sacramento, California 95818

From:	Random Person
To:	PER. climateactionplan
Subject:	Earth is pretty cool.
Date:	Thursday, September 22, 2022 8:43:00 PM

I think we should try to keep it as an option to where we, as a species, can reside. Have a pleasant day/night.

My name is Hilda lorga and I live in Sacramento County. I am writing to share that the current Climate Action Plan needs to be improved. We need a good, visionary CAP to set the direction for a livable future! The four factors that are holding us from achieving that goal are: unreliable measures, the county's sprawl, the lack of a full CEQA analysis, and GHG streamlining.

Our future is in your hands, and we want action. Thank you!

H lorga Hilda.iorga@gmail.com 915 L Street Suite C-272 Sacramento , California 95814

From:	Steve Letterly
To:	PER. climateactionplan
Cc:	"demetercorp@sbcglobal.net"; Margie Campbell; John Norman; "George Phillips (gphillips@phillipslandlaw.com)";
	Gregory Thatch; Larry Larsen
Subject:	Grandpark Sacramento County Final CAP Comment Letter
Date:	Thursday, September 22, 2022 4:03:56 PM
Attachments:	Grandpark County of Sacramento Final CAP comment letter 9 22 22.pdf

Good afternoon please see Grandpark comments on Final CAP provided in the attached document.

Thank you

Steve Letterly



September 22, 2022

VIA ELECTRONIC MAIL ClimateActionPlan@saccounty.gov

# GRANDPARK COMMENTS AUGUST 26, 2022 SACRAMENTO COUNTY FINAL CLIMATE ACTION PLAN

We have had the opportunity to review the August, 2022 Climate Action Plan (CAP) and consistent with the County's direction, we submit these comments regarding the CAP. The issues that we raise are listed in the order that they appear within the Text of the CAP and its appendices.

#### CLIMATE ACTION PLAN MAIN TEXT

Page 2, last sentence: "However, as shown in the Checklist, the CAP does not propose to streamline the GHG emissions analysis required for CEQA for projects that propose to expand the Urban Policy Area (UPA) or Urban Services Boundary (USB)."

COMMENT: The CAP provides guidance for feasible GHG emission reduction measures to be considered for all projects, including those proposing to amend the UPA and/or USB. As one of several Master Plan Communities proposing amendments to the UPA and/or USB, Grandpark was asked to partially-fund the CAP and did so ostensibly because Leighann Moffitt confirmed in April, 2020 that "each of the five master plans will benefit from the completed CAP." As noted at that time, the essential benefit of completing the CAP was to have a "qualified" plan "through which subsequent projects may receive CEQA streamlining benefits." The CAP itself confirms that it will "facilitate streamlining of GHG emissions analyses for individual development projects that comply with the requirements in the CAP by utilizing the CAP Consistency Review Checklist (Appendix I)." The last sentence and the Checklist strip these Master Plan Communities of this essential benefit of the CAP. There is no explanation provided regarding why Master Plan Communities cannot utilize the CAP to streamline CEQA analysis of GHG emissions. We request that this last sentence be deleted, and the corresponding provisions in the Checklist (Appendix I) be revised (See Checklist Comment, below).

1017 L Street #157 Sacramento, CA 95814-3805



With respect to the partial funding, Leighann Moffitt also advised the Master Plan proponents in July, 2020 that "County staff will explore reimbursement mechanisms in the context of CAP adoption, such as creating a fee on new development that will be subject to or benefit from the Phase 2B CAP." The CAP fails to address any such reimbursement mechanism.

Page 10, first bullet, second to last sentence: "If GHG reduction toward carbon neutrality has not occurred, the County would prohibit the issuance of building permits for projects which exceed the GHG threshold of 2.0 MT CO2e in 2026 (Table F.1, Appendix F).

COMMENT: "Would" should be changed to "may." This measure should be identified as an option and not as a requirement, especially since the impact on carbon neutrality at the time of consideration in 2030 is unknown.

Page 22, first sentence following listed bullet points: "If the technology to install allelectric water and/or space heating equipment for manufacturing or industrial facilities or essential medical facilities is not feasible and available by July 1, 2023, the Board of Supervisors may consider extending the limited exemption until the technology is feasible and available.

COMMENT: Change "Board of Supervisors may" to "Board of Supervisors shall" consider extending the limited exemption. If the technology is found not to be feasible by July 1, 2025, the Board should be required to "consider" extending the exemption.

Page 61, Measure Temp-08, first bullet: "Amend the County Zoning Code (Table 5.2) to require 50 percent shade tree coverage regardless of parking lot size for new development projects that include parking..."

COMMENT: This measure requiring a 50% shading requirement for new parking lots should acknowledge the competing interest in reducing the size of parking areas. The greater shading requirement will require greater space devoted to planting areas to generate the increased shade.

1017 L Street #157 Sacramento, CA 95814-3805



### APPENDIX F

Page F-1, first bullet at bottom of page: "the Infill Development Fee described in GHG-23 would be increased from \$1,000 to \$2,500 for each Dwelling Unit Equivalent."

COMMENT: GHG 23 now references a nexus study, without specific reference to this fee. This bullet should be removed or replaced with clarifying language that a nexus study WILL be prepared, and any ultimate fee would be established from that nexus study. It should also be clarified that the fee may vary depending on the geographical location of the applicable plan area.

Page F-2, first bullet: The fees collected from the infill program would be used for a competitive grant program specifically for compact, mixed-use affordable housing projects near transit stations, consistent with General Plan Policy LU-44.

COMMENT: "or mixed-income" should be added between "affordable" and "housing projects" ["affordable or mixed-income housing projects"]. The grants to be provided should not only benefit affordable housing projects. If the County truly wants to incentivize infill development, it should amend its zoning code to allow higher density residential development in all retail, MP and BP zones as of right.

Page F-2, F.1.2 "Communitywide Carbon Neutrality"

COMMENT: "Communitywide Carbon Neutrality needs to be defined so that decisionmakers and the public better understand what that entails.

Page F-2, Section 2, first bullet, first sentence: "Add a measure to the GHG Reduction Strategy that specifies the submittal of the CERP to the BOS for consideration no later than January 1, 2023."

COMMENT: Because the CERP appears to be integral to the CAP, and because staff is saying it will bring the CERP to the Board no later than January 1, 2023, why shouldn't the CAP and CERP be considered at the same time as a package? It is hard to evaluate this program without a complete package.

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Page F-2, last bullet, first sentence: "Issue a moratorium on new building permits if countywide emission are exceeding 2.0 MTCO2e per capita in 2026."

COMMENT: Declaring a moratorium will not assist the County in meeting its GHG emission reduction goals. Rather it only exacerbates the local and state housing crisis and has severe impacts to the County's economic development interests.

Page F-3, F.1.3 "Carbon Neutral New Development"

COMMENT: Imposing a carbon neutral requirement on new development ignores that even growth areas amending the UPA and USB may have fewer GHG emissions than more distant infill or fringe developments.

Page F-4, Require Carbon Neutral New Growth

COMMENT: Similar to the comment on F-2, first bullet, above, without residential development as of right in non-residential zones, the County cannot expect infill to satisfy the growth needs anticipated by the language in the CAP and this requirement.

Page F-15, F.2.34 EV Charging at SMF

COMMENT: Deleting the requirement that the airport provide additional EV charging facilities while imposing ever-increasing requirements on private development to provide the same facilities presents a double standard and is hypocritical. All County facilities should be required to meet or exceed the requirements for EV charging facilities required of the private sector.

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APPENDIX I

Page I-3, Question 3

COMMENT: This question implements the requirement for a full GHG impact analysis as part of the CEQA Process for new development projects that require amendment to the UPA and/or USB. As noted in our first comment, these projects should be exempt from CEQA if they can demonstrate compliance with the CAP. There is no explanation given as to why such projects are being automatically excluded from the CAP.

Thank you for this opportunity to comment on the Final CAP. If you should have any questions please e-mail or contact me by phone.

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