

## Draft CAP | Summary of Comments and County Responses

Sacramento County released the Draft Climate Action Plan (CAP) on March 8, 2021. The Draft CAP was posted on the County's CAP webpage, emailed to the CAP's 5,590 subscribers, and advertised on the County's social media pages. The public was invited to review the Draft CAP and provide feedback during an online workshop at the Sacramento Environmental Commission (SEC) held on March 15, 2021, and by email or letter. The deadline for providing comments was April 9, 2021.

The County received 50 written comments on the Draft CAP. The following is a summary table of the most common comments received, along with the County's responses. The comments have been organized and summarized by theme.

Summarized Comments	Response
<b>Building Electrification</b>	
<ul style="list-style-type: none"> <li>Expand all electric new development requirements to include commercial.</li> </ul>	<ul style="list-style-type: none"> <li>Measure GHG-05 was revised to require new commercial/non-residential buildings that are three stories or less to be all-electric. This will provide regional consistency and is consistent with the City of Sacramento's requirements.</li> </ul>
<ul style="list-style-type: none"> <li>Provide more details on reach codes.</li> <li>Ensure cost-effectiveness for affordable housing.</li> </ul>	<ul style="list-style-type: none"> <li>Reach codes are more stringent than the State's building code. They are required to be cost-effective. Development of the reach codes will occur following CAP adoption. Details will be provided, including cost-effectiveness, as part of the separate Board of Supervisors action to adopt the reach codes.</li> </ul>
<ul style="list-style-type: none"> <li>Consider alternative compliance methods for all-electric new residential construction.</li> </ul>	<ul style="list-style-type: none"> <li>All-electric new residential construction, paired with the State's rooftop solar mandate, is a priority for reducing greenhouse gas (GHG) emissions. Alternative compliance methods will be explored during the development of the reach codes.</li> </ul>

Summarized Comments	Response
<b>Land Use</b>	
<ul style="list-style-type: none"> <li>• Curtail leapfrog development.</li> <li>• Limit growth of undeveloped areas.</li> <li>• Focus on “smart growth”.</li> <li>• Focus compact land use development around transit/infill zones.</li> </ul>	<ul style="list-style-type: none"> <li>• A general plan is an adopted set of goals, objectives, and policies that guide future development. The Board of Supervisors adopted an updated General Plan in 2011. The General Plan’s Land Use Element contains strategies for the logical progression of urban development, including the expansion of the Urban Services Boundary (USB) and the Urban Policy Area (UPA), and for growth accommodation. These issues are already addressed in the General Plan. However, the County commits to updating the General Plan concurrently with an update to the CAP in order to cohesively address these important topics.</li> </ul>
<ul style="list-style-type: none"> <li>• Reflect State’s 30x30 land conservation policy.</li> </ul>	<ul style="list-style-type: none"> <li>• The General Plan’s Agricultural, Conservation, and Open Space elements already address land conservation in the County. Additionally, the South Sacramento Habitat Conservation Plan (SSHCP), a County led effort, is projected to create an interconnected regional preserve system of over 36,000 acres. However, the County commits to updating the General Plan concurrently with an update to the CAP in order to cohesively address this important topic.</li> </ul>
<b>Climate Emergency Declaration</b>	
<ul style="list-style-type: none"> <li>• Set targets for carbon neutrality by 2030.</li> </ul>	<ul style="list-style-type: none"> <li>• The Climate Emergency Resolution specifies that the CAP must explain how the County will transition to carbon neutrality by 2030. The CAP proposes measures to put the County on the path to carbon neutrality, and commits to certain actions, such as an update to the CAP concurrently with an update to the General Plan in order, to achieve the target.</li> </ul>
<ul style="list-style-type: none"> <li>• Increase public participation in CAP development.</li> </ul>	<ul style="list-style-type: none"> <li>• The development of the CAP was informed through input from public outreach meetings, individual stakeholder meetings, and a Stakeholder Working Group, as well as the numerous emails and letters that were received. The adoption of the CAP is not the end, however. The Implementation and Monitoring section of the CAP includes continued public participation and communication.</li> </ul>

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<b>Carbon Offset Program</b>	
<ul style="list-style-type: none"> <li>• Keep funds and offsets local.</li> <li>• Prioritize environmental justice communities.</li> </ul>	<ul style="list-style-type: none"> <li>• The County is committed to keeping funds local. When GHG reductions are local, it is a win-win for the County. The emphasis would be on local/regional reductions first, before expanding further. Additionally, the General Plan's Environmental Justice Element indicates the County's environmental justice communities shall be prioritized when creating programs such as the Carbon Offset Program.</li> </ul>
<ul style="list-style-type: none"> <li>• Add fee on new development for retrofitting existing buildings.</li> <li>• Invest in conservation/restoration projects to mitigate for the loss of sequestration capacity when open land is lost to development.</li> </ul>	<ul style="list-style-type: none"> <li>• The CAP indicates that the County may explore creating a Carbon Offset Program. If established, this program could fund a variety of GHG reducing activities such as retrofitting existing building to be more energy efficient or carbon sequestration programs.</li> </ul>
<ul style="list-style-type: none"> <li>• Monitor, track, and record annually.</li> </ul>	<ul style="list-style-type: none"> <li>• The Carbon Offset Program would be implemented with oversight from a third party organization to validate GHG reductions.</li> </ul>
<b>GHG Reduction Measures</b>	
<ul style="list-style-type: none"> <li>• Include more focus on on-road transportation.</li> </ul>	<ul style="list-style-type: none"> <li>• The CAP is composed of GHG reduction measures for which the County has control. Many standards related to on-road transportation come from the federal and State government. However, the County is doing its part, and half of the GHG reduction measures in the CAP are focused on the on-road transportation sector.</li> </ul>
<ul style="list-style-type: none"> <li>• Include greater specificity for implementation.</li> </ul>	<ul style="list-style-type: none"> <li>• The CAP is a broad policy document that sets the Board of Supervisors' direction for the County. Staff will use this direction to proceed with implementation. However, implementation steps are outlined to the extent feasible. Each GHG reduction measure includes a description of implementation steps for that measure, and the Implementation and Monitoring section commits the County to additional actions.</li> </ul>

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<ul style="list-style-type: none"> <li>Clarify purpose of non-quantified measures.</li> <li>Provide target indicators for all measures &amp; interim targets.</li> </ul>	<ul style="list-style-type: none"> <li>Non-quantified measures are included in the CAP because they are supportive of the overall GHG reduction strategy and/or they will provide GHG reductions themselves, but the data is not available to quantify.</li> <li>The CAP was revised to include target indicators with interim goals for all quantified GHG reduction measures.</li> </ul>
<ul style="list-style-type: none"> <li>Provide details on assumptions used for quantification.</li> </ul>	<ul style="list-style-type: none"> <li>The CAP was revised to include all assumptions for quantification in Appendix E.</li> </ul>
<b>Carbon Sequestration</b>	
<ul style="list-style-type: none"> <li>Increase priority of sequestration measures.</li> </ul>	<ul style="list-style-type: none"> <li>Carbon sequestration is a critical pathway to achieving long-term GHG reductions. Measure GHG-01, Carbon Farming, is a large part of the County's GHG reductions. However, more will need to be done. The County commits to updating the CAP using the State's 2022 Climate Change Scoping Plan and Natural and Working Lands Climate Smart Strategy, which will include guidance on recommended carbon sequestration measures.</li> </ul>
<ul style="list-style-type: none"> <li>Offer third party review of carbon sequestration measures.</li> </ul>	<ul style="list-style-type: none"> <li>The County has committed to updating the CAP to achieve carbon neutrality by 2030. At that time, the reduction measures, and their associated assumptions and methodologies, will be consistent with the current guidance from the State, particularly the 2022 Climate Change Scoping Plan and Natural and Working Lands Climate Smart Strategy.</li> </ul>
<b>Capacity Building</b>	
<ul style="list-style-type: none"> <li>Provide additional staff resources to CAP and Climate Emergency Task Force.</li> <li>Hire a professional grant writer to obtain federal or State Funding.</li> <li>Increase interaction between CAP implementation and Climate Emergency Task Force.</li> </ul>	<ul style="list-style-type: none"> <li>The County is in the process of recruiting a Sustainability Manager who would be the coordinator for overall CAP implementation. The Sustainability Manager would have the ability to form internal teams to support implementation as well as apply for grants to help the County achieve carbon neutrality.</li> <li>The Sustainability Manger would be the primary point of contact between the County and the Climate Emergency Task Force. Therefore, implementation of the CAP will be linked with the work of the Climate Emergency Task Force.</li> </ul>

Summarized Comments	Response
<ul style="list-style-type: none"> <li>Conduct additional public outreach.</li> </ul>	<ul style="list-style-type: none"> <li>The development of the CAP was informed through input from public outreach meetings, individual stakeholder meetings, and a Stakeholder Working Group, as well as the numerous emails and letters that were received. The CAP will be taken to the County's Planning Commission and Board of Supervisors where further public input may be provided. However, the adoption of the CAP is not the end. The Implementation and Monitoring section of the CAP includes continued public participation and communication.</li> </ul>
GHG Forecast and Targets	
<ul style="list-style-type: none"> <li>Include contingencies if policies fail to meet goals.</li> </ul>	<ul style="list-style-type: none"> <li>The CAP indicates that the County is forecast to beat the State's 2030 target without any of the proposed GHG reduction measures, partially due to SMUD's Carbon Neutrality Plan which was adopted in March 2021. However, the CAP goes further and sets a steeper target that will put the County on the path towards carbon neutrality. Measures contained in Appendix E, which are not proposed to be included in the CAP at this time, could be used as contingencies or included in a future CAP update.</li> </ul>
<ul style="list-style-type: none"> <li>Consider targets beyond 2030.</li> </ul>	<ul style="list-style-type: none"> <li>The Climate Emergency Resolution specifies that the CAP must explain how the County will transition to carbon neutrality by 2030. The CAP proposes measures to put the County on the path to carbon neutrality, and commits to certain actions, such as an update to the CAP concurrently with an update to the General Plan, in order to achieve the target.</li> <li>It is important that the County stay focused on taking the first step towards carbon neutrality by 2030 with the adoption, implementation, and monitoring of the CAP.</li> </ul>