
DRAFT SUBSEQUENT ENVIRONMENTAL IMPACT REPORT

**SACRAMENTO COUNTY
CLIMATE ACTION PLAN**



Control Number: PLNP2016-00063
State Clearinghouse Number: 2023120386
July 2024

COUNTY OF SACRAMENTO

DEPARTMENT OF COMMUNITY DEVELOPMENT
PLANNING AND ENVIRONMENTAL REVIEW
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This Subsequent Environmental Impact Report has been prepared pursuant to the California Environmental Quality Act of 1970 (Public Resources Code Division 13). An Environmental Impact Report is an informational document which, when this Department requires its preparation, shall be considered by every public agency prior to its approval or disapproval of a project. The purpose of an Environmental Impact Report is to provide public agencies with detailed information about the effect that a proposed project is likely to have on the environment; to list ways in which any adverse effects of such a project might be minimized; and to suggest alternatives to such a project.

Prepared by the
COUNTY OF SACRAMENTO
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List of Abbreviations

°C	degrees Celsius
°F	degrees Fahrenheit
µg/m ³	micrograms per cubic meter
2022 Scoping Plan	<i>Final 2022 Scoping Plan for Achieving Carbon Neutrality</i>
AB	Assembly Bill
ABAU	legislative adjusted business-as-usual scenario
ACC	Advanced Clean Cars
ADA	Americans with Disabilities Act
AEP	Association of Environmental Professionals
ALUCP	airport land use compatibility plan
AQAP	air quality attainment plan
ATP	Active Transportation Plan
BAU	business-as-usual scenario
BMP	best management practice
BUILD	Building Initiative for Low-Emissions Development
CAA	Clean Air Act
CAAQS	California ambient air quality standards
CAFE	Corporate Average Fuel Economy
CAL FIRE	California Department of Forestry and Fire Protection
CalEEMod	California Emissions Estimator Model
CALGreen Code	California Green Building Standards Code
CalRecycle	California Department of Resources Recycling and Recovery
Caltrans	California Department of Transportation
CAP	climate action plan
CARB	California Air Resources Board
CCI	Carbon Cycle Institute
CCR	California Code of Regulations
CEC	California Energy Commission

CO	carbon monoxide
CO ₂	carbon dioxide
community	unincorporated County
construction BMP	Basic Construction Emission Control Practice
County	Sacramento County government
County Code	Sacramento County Code of Ordinances
diesel PM	diesel particulate matter
DOT	U.S. Department of Transportation
DUE	dwelling unit equivalent
EDR1	Energy Design Rating
EIR	environmental impact report
EJ	Environmental Justice
EO	Executive Order
EPA	U.S. Environmental Protection Agency
EV	electric vehicle
FR	<i>Federal Register</i>
General Plan	<i>Sacramento County General Plan of 2005–2030</i>
GHG	greenhouse gas
GPU EIR	<i>Sacramento County General Plan Update Final Environmental Impact Report</i>
GVWR	gross vehicle weight rating
GWh	gigawatt-hours
HEEHRA	High-Efficiency Electric Home Rebate
HOMES	Homeowner Managing Energy Savings
HPS	high-pressure sodium
I-5	Interstate 5
ICE	internal combustion engine

IEPR	Integrated Energy Policy Reports
Improvement Standards	Sacramento County Improvement Standards
IPCC	Intergovernmental Panel on Climate Change
IRP	integrated resource plan
lb/day	pounds per day
LED	light-emitting diode
LOS	level of service
MEI	maximally exposed individual
Metro Fire	Sacramento Metropolitan Fire District
MMT	million metric tons
MMTCO _{2e}	million metric tons of carbon dioxide equivalent
MND	mitigated negative declaration
mpg	miles per gallon
MPO	metropolitan planning organization
MSAT Protocol	Mobile Sources Air Toxics Protocol
MTCO _{2e}	metric tons of carbon dioxide equivalent
MTIP	Metropolitan Transportation Improvement Program
MTP/SCS	Metropolitan Transportation Plan/Sustainable Communities Strategy
MV	mercury-vapor
MW	megawatts
MY	model year
NAAQS	national ambient air quality standards
NHTSA	National Highway Traffic Safety Administration
NO	nitric oxide
NO ₂	nitrogen dioxide
NOP	notice of preparation
NO _x	oxides of nitrogen
NPDES	National Pollutant Discharge Elimination System

OPR	Governor’s Office of Planning and Research
ozone	photochemical smog
PER	Planning and Environmental Review
PG&E	Pacific Gas and Electric Company
PM _{2.5}	particulate matter 2.5 micrometers or less in diameter
PM ₁₀	particulate matter 10 micrometers or less in diameter
ppb	parts per billion
ppm	parts per million
PRC	Public Resources Code
PV	photovoltaic
ROG	reactive organic compounds
RTP	regional transportation plan
SacDOT	Sacramento County Department of Transportation
SACOG	Sacramento Area Council of Governments
SacRT	Sacramento Regional Transit
SB	Senate Bill
SCAS	Sacramento County Airport System
SCS	sustainable communities strategy
SEIR	subsequent environmental impact report
SFNA	Sacramento Federal Nonattainment Area
SHRA	Sacramento Housing and Redevelopment Agency
SIP	state implementation plan
SMAQMD	Sacramento Metropolitan Air Quality Management District
SMAQMD Guide	<i>Guide to Air Quality Assessment in Sacramento County</i>
SMUD	Sacramento Municipal Utility District
SO ₂	sulfur dioxide
SR	State Route
SSHCP	South Sacramento Habitat Conservation Plan
SVAB	Sacramento Valley Air Basin

TAC	toxic air contaminant
TAG	Transportation Analysis Guidelines
TCP	Traffic Control Plan
TDM	transportation demand management
Technical Advisory	<i>Technical Advisory on Evaluating Transportation Impacts in CEQA</i>
TIA	Traffic Impact Analysis
TMA	Transportation Management Association
tpy	tons per year
TSM	transportation system management
UCCE	University of California Cooperative Extension
U.S. 50	U.S. Highway 50
USC	United States Code
VMT	vehicle miles traveled
VOC	volatile organic compounds
ZEV	zero-emission vehicle

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ES EXECUTIVE SUMMARY

This subsequent environmental impact report (SEIR) describes the potential environmental impacts associated with the Sacramento County Climate Action Plan (CAP). The purpose of this SEIR is to evaluate the project's effects on environmental resources, both singularly and in a cumulative context, to examine alternatives to the project as proposed, and identify mitigation measures to reduce or avoid potentially significant effects. This document has been prepared in compliance with the California Environmental Quality Act (CEQA; Sections 21000-21189 of the Public Resources Code [PRC]) and the State CEQA Guidelines (Title 14, Sections 15000-15387 of the California Code of Regulations).

SUMMARY OF THE PROJECT

Sacramento County's 2024 CAP is a comprehensive plan for the reduction of GHG emissions. The CAP is a multi-objective plan that balances environmental, economic, and community interests; implements the General Plan; and aligns with multiple County initiatives. It identifies strategies and measures to meet the State's 2030 and 2045 GHG reductions targets. Each measure is supported by one or more implementing actions that identify specific actions the County would take to achieve GHG reductions under the measure. The measures and actions compile the efforts of existing local and regional initiatives, call for the development of new and more aggressive programs, and commit the County to the study of innovative technologies. The overarching goal of the CAP is to refine community and government practices to reduce GHG impacts from implementation of the General Plan and establish a detailed accounting framework to track progress towards achieving that goal. The CAP also includes an adaptation plan that recommends actions to reduce the community's vulnerability to the anticipated impacts of climate change.

The CAP is organized into a main CAP document that provides general information about the County's approach and actionable strategies followed by appendices containing more information on the analyses used to inform the strategies and measures. The detailed description of the CAP is included in Chapter 2, "Project Description."

SUMMARY OF ALTERNATIVES EVALUATED

Chapter 3, "Alternatives," provides an evaluation of alternatives to the CAP, as well as "smart growth" planning alternatives. The following alternatives are evaluated in detail in this SEIR:

- No Project Alternative
- Carbon Neutral new Development Alternative

AREAS OF CONTROVERSY

Several areas of controversy have been identified through stakeholder engagement since the initial phases of CAP preparation began in 2011. Recurring themes include:

- The CAP's relationship to the General Plan and GPU EIR
- The appropriate CEQA document for the CAP
- The adequacy and age of the GPU EIR analyses
- The use of the CAP for streamlining the GHG emissions analysis of future projects
- Appropriate CAP targets
- The level of detail required for CAP Measures and Implementing Actions
- The enforceability of CAP Measures
- Electrification of new and existing development
- Funding for CAP implementation

ISSUES TO BE RESOLVED

CEQA Guidelines Section 15123(b)(3) requires that an EIR identify issues to be resolved, including the choice among alternatives and whether or how to mitigate significant impacts. With regard to the project, the major issues to be resolved include decisions by the County, as lead agency, related to:

- Whether this SEIR adequately describes the environmental impacts associated with the project.
- Whether the benefits of the project override environmental impacts, if any, that cannot be feasibly avoided or mitigated to a level of insignificance.
- Whether the identified mitigation measures should be approved or modified.
- Whether there are other mitigation measures that should be applied to the project besides those mitigation measures identified in this SEIR.
- Whether there are any alternatives to the project that would substantially lessen any of the significant impacts of the project and achieve most of the basic project objectives.

The Board serves as the decision-making body for the project. Before the Board takes final action on any project-related issues, recommendations will be developed by the staff and the Planning Commission. In developing these recommendations and rendering a decision, the County will consider input provided by the public, other agencies, the community planning groups, and advisory groups. In addition, the

decisions of the Planning Commission and Board are made in public hearings at which public comment is invited.

Further, the Board must consider the significant effects of the project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project. In addition, the Board must determine whether significant effects identified in this SEIR can be reduced further. Finally, the Board must determine whether any of the project alternatives would substantially reduce the significant identified in this SEIR while still meeting key project objectives. The Board must respond by making “findings” regarding each significant impact identified in this SEIR. Preparation of a statement of overriding considerations (explaining the overriding value of the project despite adverse effects) would be required for any remaining significant and unmitigated impacts.

SUMMARY OF SIGNIFICANT ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

This SEIR has been prepared to evaluate the physical environmental effects associated with implementation of the CAP. The CAP would not result in any new significant effects not disclosed in the GPU EIR. No new or modified mitigation is proposed.

TERMINOLOGY USED IN THIS SEIR

This SEIR uses the following terminology to describe environmental effects of the project.

Significance Criteria. A set of criteria used by the lead agency to determine at what level, or “threshold,” an impact would be considered significant. Significance criteria used in this SEIR include those that are set forth in the CEQA Guidelines, or can be discerned from the CEQA Guidelines; criteria based on factual or scientific information; criteria based on regulatory standards of local, state, and federal agencies; and criteria based on goals and policies identified in the Sacramento County General Plan.

Less-than-Significant Impact. A project impact is considered less than significant when it does not reach the standard of significance and would therefore cause no substantial change in the environment. No mitigation is required for less-than-significant impacts.

Potentially Significant Impact. A potentially significant impact is a substantial, or potentially substantial, adverse change in the environment. Physical conditions which exist within the area will be directly or indirectly affected by the proposed project. Impacts may also be short-term or long-term. A project impact is considered significant if it reaches the threshold of significance identified in the EIR. Mitigation measures may reduce a potentially significant impact to less than significant.

Significant Unavoidable Impact. A project impact is considered significant and unavoidable if it is significant and cannot be avoided or mitigated to a less-than-significant level once the project is implemented.

Cumulative Significant Impact. A cumulative impact can result when a change in the environment results from the incremental impact of a project when added to other related past, present or reasonably foreseeable future projects. Significant cumulative impacts may result from individually minor but collectively significant projects.

Mitigation. Mitigation measures are revisions to the project that would minimize, avoid, or reduce a significant effect on the environment. CEQA Guidelines §15370 identifies 5 types of mitigation:

- a) Avoiding the impact altogether by not taking a certain action or parts of an action.
- b) Minimizing impacts by limiting the degree or magnitude of the action and its implementation.
- c) Rectifying the impact by repairing, rehabilitating, or restoring the impacted environment.
- d) Reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action.
- e) Compensating for the impact by replacing or providing substitute resources or environments.

1 INTRODUCTION

1.1 PROJECT OVERVIEW

The Sacramento County (County) Climate Action Plan (CAP) is a comprehensive plan for reducing greenhouse gas (GHG) emissions and adapting to the effects of climate change that identifies strategies and measures to meet the State of California’s 2030 and 2045 GHG emissions reduction targets. The CAP is a multi-objective plan that balances environmental, economic, and community interests; provides mechanisms to reduce GHG emissions associated with implementing the *Sacramento County General Plan of 2005–2030* (General Plan); and aligns with multiple County initiatives. The CAP is a policy document and does not propose any specific future projects.

Each measure in the CAP is supported by one or more implementing actions that identify specific steps the County would take to achieve GHG reductions or promote climate adaptation resilience. The measures and actions compile the efforts of existing local and regional initiatives, call for the development of new and more aggressive programs, and commit the County to ongoing study, monitoring, and action. The first overarching goal of the CAP is to refine community and government practices to reduce GHG emissions impacts from implementation of the General Plan and establish a detailed accounting framework to track progress towards achieving that goal. The second overarching goal of the CAP is to provide an adaptation plan that reduces the community’s vulnerability to the impacts of climate change.

The CAP is organized into a main document that provides general information about the County’s approach and actionable strategies, followed by appendices that contain more information on the analyses used to inform the strategies and measures. For a more detailed description of the CAP for purposes of analysis in this EIR, see Chapter 2, “Project Description.”

1.2 PROJECT BACKGROUND

1.2.1 PROJECT HISTORY

In the last several decades, awareness has increased that global warming—a rise in Earth’s near-surface temperature, predicted to result from the emission of GHGs by human and natural activities—poses societal challenges: decreased water supply, increased flooding risks, stresses to the agricultural industry, increased fire risks, degraded air and water quality, impaired terrestrial and aquatic habitat, and negative public health impacts. In September 2006, Governor Arnold Schwarzenegger signed Assembly Bill (AB) 32, the Global Warming Solutions Act of 2006. This landmark legislation required California to reduce GHG emissions to 1990 levels by 2020 and prompted the County to take action.

Land use and planning decisions within unincorporated Sacramento County are guided by the General Plan. The County adopted the General Plan in 2011 after certifying the *Sacramento County General Plan Update Final Environmental Impact Report* (GPU EIR).

The GPU EIR includes two mitigation measures that require the County to develop a CAP:

- *Mitigation Measure CC-1* states: “The following policy shall be added to the General Plan: It is the goal of the County to reduce greenhouse gas emissions to 1990 levels by the year 2020. This shall be achieved through a mix of State and local action.” No further action related to Mitigation Measure CC-1 is required.
- *Mitigation Measure CC-2* further specifies implementation measures including when the County must adopt a CAP, what elements the CAP must contain, and how often the County shall complete an inventory of GHG emissions. Mitigation Measure CC-2 was incorporated into the Land Use Element of the General Plan as Implementation Measures F, G, H, I and J (see page 125 of the General Plan’s Land Use Element).

The County is implementing Mitigation Measure CC-2 in phases. On November 9, 2011, the County Board of Supervisors adopted the *Climate Action Plan—Strategy and Framework Document*, which presented a framework for reducing GHG emissions and an overall strategy to address climate change. On September 11, 2012, the Board of Supervisors adopted the *Climate Action Plan—Government Operations*, which quantified GHG emissions from the County's operations (e.g., operation of County-owned facilities, vehicles, and equipment) and identified measures to reduce these emissions.

The County began work on a comprehensive CAP in 2016 to supersede the 2011 and 2012 plans and achieve communitywide GHG reductions and resiliency. Several drafts of the comprehensive CAP were circulated for public review in 2021 and 2022.

The County continues to refine the CAP in response to stakeholder input received on the previous drafts of the CAP. The proposed CAP builds on the Final CAP released in August 2022 by updating the GHG inventory and forecasts for the unincorporated county, identifying GHG reduction targets based on the most recently adopted State legislation, modifying GHG emissions reduction measures relative to those previously circulated for public review, and improving the alignment of the CAP with recent changes in State regulations. Additionally, to prepare for climate change impacts (e.g., impacts related to precipitation, flooding, heat waves, wildfires, air quality, water supply, water quality, natural ecosystems, and agriculture), this CAP includes preparation of a vulnerability assessment and an adaptation strategy.

1.2.2 PUBLIC OUTREACH

The CAP has been shaped by community input. Beginning in 2016, the County conducted a variety of public engagement activities, reaching a wide range of audiences and striving to ensure that the format for participation would be accessible. Public outreach included conducting virtual workshops, online surveys, and stakeholder interviews; tabling or speaking at community events; hosting informational booths; and soliciting feedback from Sacramento Environmental Commission, the County Planning Commission, and the Board of Supervisors.

The County hosted four public workshops at various community locations (including two disadvantaged Environmental Justice communities, as defined and designated in the County's Environmental Justice Element) to ensure that the CAP would capture the ideas and concerns of residents and businesses. Outreach media were produced to advertise community events, solicit input on the CAP, and provide general information on the CAP development process. All flyers for community events were produced in both English and Spanish. Between 2017 and 2018, more than 20 meetings were conducted with individual stakeholder groups and partners including the North State Building Association, the Sacramento Municipal Utility District (SMUD), Teichert, the Sacramento Sierra Club, 350 Sacramento (an environmental organization), and the Sacramento Association of Realtors.

In 2020, a stakeholder group representing a wide variety of interests was formed to provide input on the CAP. The stakeholder working group consisted of representatives from 350 Sacramento; Associated Builders and Contractors, Inc.; Capital Region Climate Readiness Collaborative; Community Resource Project, Inc.; Environmental Council of Sacramento; Lewis Group of Companies; North State Building Industry Association; Sacramento Metropolitan Air Quality Management District; SMUD; Sacramento Regional Builders' Exchange; and the Sierra Club Mother Lode Chapter.

Ongoing outreach with key stakeholders has continued, including through public hearings for the Final Draft CAP in fall 2021 and the Revised Final Draft CAP in 2022. Throughout this process, the County has provided CAP updates via a dedicated project web page, email notifications, community meetings, and press releases. A full accounting of the public outreach conducted for the CAP is provided as Appendix C to the CAP.

If the CAP is adopted, the County would continue its public outreach efforts to enable County departments, external stakeholders, and the general public to monitor the progress and effectiveness of each CAP measure.

1.3 REGULATORY CONTEXT

Climate action planning requires action from all levels of government. Federal and State climate regulations and goals guide and provide examples for local government actions to reduce GHG emissions. At the national level, Executive Order 14057: Catalyzing Clean Energy Industries and Jobs through Federal Sustainability, signed by President

Joe Biden in December 2021, sets goals for federal operations of reaching 100 percent carbon pollution-free electricity by 2035 and a net-zero-emissions economy by 2050. In addition, federal investments to tackle climate change, such as the Inflation Reduction Act and Bipartisan Infrastructure Law, are leading the push to advance environmental justice, strengthen energy security and green the grid, lower energy costs for households, strengthen the nation’s resilience, and reduce air pollution.

In California, AB 32 (2008) established the United States’ first comprehensive, long-term approach to addressing climate change. AB 32 led to the development of State programs and standards, such as the Advanced Clean Cars Standard and Renewables Portfolio Standard, that target GHG emissions reductions from cars and trucks, electricity production, fuels, and other sources. Since the passage of AB 32, the State has continued to enact complementary legislation that addresses GHG emissions from specific sectors including land use, transportation, energy, and water, as well as environmental justice and public health issues. This legislation includes Senate Bill 32, signed in 2016, which set the State’s 2030 GHG emissions reduction target at 40 percent below 1990 levels; and AB 1279, signed in 2022, which requires the State to achieve net zero GHG emissions no later than 2045, and that statewide anthropogenic GHG emissions be reduced to at least 85 percent below 1990 levels by 2045. California’s commitment to reduce GHG emissions and improve climate resiliency identifies opportunities for local governments to play a role in helping achieve these ambitious targets, opens new markets, and establishes climate planning as a core principle for business practices.

The California Air Resources Board (CARB) released the *Final 2022 Scoping Plan for Achieving Carbon Neutrality* (2022 Scoping Plan) on November 16, 2022, as directed by AB 1279. The 2022 Scoping Plan traces the pathway for the State to achieve carbon neutrality and an 85 percent reduction in anthropogenic emissions below 1990 levels by 2045. CARB adopted the 2022 Scoping Plan on December 16, 2022.

1.4 ENVIRONMENTAL IMPACT REPORT SCOPE AND PROCESS

1.4.1 PROGRAM ENVIRONMENTAL IMPACT REPORT

The GPU EIR evaluates the effects of the overall program of development within the county pursuant to the General Plan. Like the 2011 GPU EIR, this environmental impact report (EIR) provides a program-level environmental analysis (see CEQA Guidelines Section 15168). A “program EIR” is a type of EIR that is used to evaluate a plan or program that has multiple components or actions that are related either geographically; as logical parts in the chain of contemplated actions; in connection with application of rules, regulations, plans, or other general criteria to govern the conduct of a continuing program; or as individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental impacts which can be mitigated in similar ways (Public Resources Code [PRC] Sections 21068.5 and 21093; California Code of Regulations Title 14, Section 15168[a]). It evaluates the general

impacts of the plan or program but may not examine all the potential site-specific impacts of the many individual projects that may be proposed in the future consistent with the plan. The CAP would serve as a qualified GHG emissions reduction plan used for programmatic tiering per CEQA Guidelines Sections 15064.4(b)(3) and 15183.5(b).

As a program EIR, this subsequent environmental impact report (SEIR) considers broad environmental implications of implementing the CAP on a conceptual basis. The analysis recognizes that a series of actions would occur before the development of specific projects, potentially including additional project-specific CEQA review to determine whether any site-specific significant impacts were not addressed in the program EIR.

If additional CEQA documentation is required to address the potentially significant impacts of specific projects, a subsequent project-specific environmental review would be conducted. For example, if a later activity would have impacts not examined in the GPU EIR or this CAP EIR, then preparation of either a project-specific negative declaration or an EIR could be appropriate. That later analysis may tier to this EIR, or the GPU EIR as provided in CEQA Guidelines Section 15152, and the applicable mitigation measures in this EIR and/or the GPU EIR would be incorporated into the later activities.

Alternatively, if the County finds that no subsequent EIR is required pursuant to CEQA Guidelines Section 15162 and the later activity is therefore within the scope of the CAP EIR, then additional environmental documentation may not be required (CEQA Guidelines Section 15168[c]). An environmental checklist or other similar document would be used to document whether significant impacts that were not addressed may occur.

1.4.1.1 SUBSEQUENT ENVIRONMENTAL REVIEW

To avoid repetition, wasted time, and unnecessary speculation, a lead agency may “tier” the CEQA analysis for a sequence of actions so that the later CEQA documents incorporate and build on the information in the previous EIRs. (PRC Sections 21068.5 and 21093; CEQA Guidelines Section 15152.) CEQA Guidelines Sections 15162–15164 set forth the criteria for determining the appropriate additional environmental documentation, if any, to be completed when there is a previously certified EIR covering the project and a later discretionary action is required.

Pursuant to CEQA Guidelines Section 15162(a), an SEIR or a mitigated negative declaration shall be prepared only if an EIR has been certified for a project and one or more of the following conditions are present:

1. Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
2. Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

3. New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the negative declaration was adopted, shows any of the following:
 - A. The project will have one or more significant effects not discussed in the previous EIR or negative declaration.
 - B. Significant effects previously examined will be substantially more severe than shown in the previous EIR.
 - C. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative.
 - D. Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

The GPU EIR includes a preliminary analysis of the potential effects of implementing Mitigation Measure CC-1 and Mitigation Measure CC-2 in Chapter 12, "Climate Change." In concert with federal and State activities, this mitigation is intended to offset the cumulatively significant climate change impact associated with implementation of the General Plan. The GPU EIR notes that although "the Climate Action Plan is intended to benefit the County in a variety of ways, there are potential negative physical consequences associated with implementation" (see page 12-33 of the GPU EIR), including construction of GHG-related infrastructure, and provides several specific examples.

The County certified the GPU EIR (State Clearinghouse Number 2007082086) and adopted the General Plan. As noted above, the CAP is a comprehensive plan that identifies measures and actions for addressing State GHG legislation and implementing the GPU EIR mitigation. Therefore, the County has determined that the CAP meets the requirements for a SEIR to the 2011 GPU EIR (CEQA Guidelines Section 15162[a]).

The County has prepared this SEIR to provide the public and responsible and trustee agencies with information about the potential environmental effects associated with implementation of the CAP. The analysis in this SEIR describes the project conditions as compared to the GPU EIR, including the legal and regulatory framework relevant to the project, standards of significance to be used in the analysis, and analysis methodologies. This SEIR evaluates whether implementing the project would potentially result in one or more new or more severe significant environmental effects compared to the impacts identified in the GPU EIR. Mitigation has been recommended where feasible to reduce or avoid the project's significant impacts. Mitigation measures from the GPU EIR that are adopted and apply to the project are identified.

The General Plan and GPU EIR are available for review at the County's Planning and Environmental Review Division offices (827 7th Street, Room 225, Sacramento, CA 95814) and online at the following location:
<https://planning.saccounty.gov/PlansandProjectsIn-Progress/Pages/GeneralPlan.aspx>.

1.4.2 LEAD, RESPONSIBLE, AND TRUSTEE AGENCIES

Sacramento County is the “lead agency” under CEQA for this SEIR because it has discretionary authority to determine whether or how to approve the project. “Responsible agencies” are other public agencies, other than the lead agency, that have responsibility for carrying out or approving a project. “Trustee agencies” have jurisdiction over certain resources held in trust for the people of California. Federal agencies, which are not considered responsible agencies because CEQA is inapplicable to their activities, may nevertheless use the environmental information contained in the EIR to aid in their decision-making.

No agencies other than the County have approval or permitting authority for County planning documents such as the CAP. However, implementation of the CAP could involve the following agencies, depending on the details of future development required for implementation of the CAP's measures and actions. The following are some of the agencies that could be required to act as responsible agencies for future projects that implement CAP programs:

- U.S. Fish and Wildlife Service
- California Department of Fish and Wildlife
- Central Valley Regional Water Quality Control Board
- California Department of Transportation
- Sacramento Metropolitan Air Quality Management District
- SMUD

1.4.3 SCOPE OF THE ENVIRONMENTAL IMPACT REPORT

The analysis in this SEIR is based on implementing GHG emissions reduction measures on lands identified for development in the GPU EIR. Consequently, most potential environmental impacts associated with the CAP would be the same as those of other General Plan development and would require the same mitigation measures as identified in the GPU EIR.

This SEIR evaluates the following resource topics and other CEQA-mandated issues (e.g., cumulative impacts, irreversible environmental changes, and growth-inducing impacts) because they were determined to potentially result in new significant impacts when considered in light of the GPU EIR:

- Air quality

- Biological resources
- Energy
- Greenhouse gases and climate change
- Transportation

Under CEQA and the CEQA Guidelines, a lead agency may limit an EIR’s discussion of environmental effects when such effects are not considered potentially significant (PRC Section 21002.1[e]; CEQA Guidelines Sections 15128 and 15143) or where such impacts were previously addressed (CEQA Guidelines Section 15168). Information used to determine which impacts would be potentially significant was derived from review of the project; review of applicable planning documents and CEQA documentation, including the GPU EIR; feedback from public and agency consultation; and comments received in response to the notice of preparation (NOP) for this SEIR.

In compliance with CEQA Guidelines Section 15082, the NOP for this draft SEIR was distributed to the California State Clearinghouse; relevant responsible and trustee agencies; other federal, State, and local agencies; and interested individuals and organizations. The NOP was available for public review and comment between December 14, 2023, and January 31, 2024. A virtual scoping meeting was held on January 10, 2024, to allow for input from the public, affected agencies, and interested organizations. The NOP and written comments received during the NOP review period are included in Appendix A of this SEIR. Table 1-1 summarizes the NOP comments received regarding environmental issues associated with the 2024 CAP.

Table 1-1: Summary of Notice of Preparation Comments

Environmental Topics	Comments Summary
Project Description/CAP Measures and Actions	<ul style="list-style-type: none"> • Provided comments on project background regarding the history of the CAP. • Provided comments on project purpose. • Expressed concerns related to the sustainability of voluntary programs and uncertainty of scheduling. • Recommended the County focus on measures best aligned with its authorities and use its land use authority to avoid a loss of natural sequestration. • Requested that the CAP include land use policies to encourage smart growth. • Requested evidence to support using 2023 as the baseline year for the GHG emissions inventory. • Requested evaluation of environmental impacts related to both quantified and unquantified measures. • Requested evaluation of the adequacy of the CAP’s monitoring and updating procedures. • Expressed opposition to out-of-jurisdiction carbon offset programs.
Alternatives	<ul style="list-style-type: none"> • Suggested smart growth alternatives (e.g., transit oriented, infill development, and VMT reduction).

Environmental Topics	Comments Summary
Agriculture and Forestry Resources	<ul style="list-style-type: none"> Requested evaluation of impacts on the county's agricultural lands, forest lands, and lands with high carbon sequestration.
Air Quality	<ul style="list-style-type: none"> Requested a discussion related to potential secondary impacts on air quality from foreseeable emissions of priority pollutants from induced traffic.
Biological Resources	<ul style="list-style-type: none"> Requested a thorough discussion of the impacts on biological resources, including direct, indirect, and cumulative impacts.
Cultural Resources and Tribal Cultural Resources	<ul style="list-style-type: none"> Provided a summary of Assembly Bill 52 and Senate Bill 18 compliance requirements. Provided recommendations related to consultation with Tribes and conducting records search.
Greenhouse Gas Emissions and Climate Change	<ul style="list-style-type: none"> Requested an explanation for deviating from the 2020 SCS's GHG emissions projections. Stated that CAP-related GHG impacts would be substantially more severe than in 2011 because of more stringent regulations. Suggested a discussion of consistency with the Phase 1 CAP. Suggested considering GHG emissions effects related to excess entitlements. Suggested an analysis related to soil carbon emissions. Suggested GHG emissions reduction mitigation measures (e.g., cool pavement and transitioning natural gas in existing buildings).
Transportation	<ul style="list-style-type: none"> Requested an analysis of effects of any deviations on achievement of the SCS's mandated VMT goals and other secondary and cumulative impacts. Suggested a discussion of consistency with SACOG's SCS.
Land Use	<ul style="list-style-type: none"> Suggested discussion of consistency with GPU policies (e.g., Policies LU-3 and LU-68). Requested an evaluation of the consistency of proposed land use changes (e.g., growth boundary adjustment) with the SACOG Blueprint.

NOTES: CAP = climate action plan; County = Sacramento County; GHG = greenhouse gas; GPU = *Sacramento County General Plan Update*; SACOG = Sacramento Area Council of Governments; SCS = Sustainable Communities Strategy; VMT = vehicle miles traveled

1.5 ENVIRONMENTAL EFFECTS ADEQUATELY ADDRESSED IN THE GENERAL PLAN UPDATE EIR

A detailed description of the GHG measures referenced below can be found in Chapter 2, "Project Description," of this SEIR and Chapter 2 of the CAP.

1.5.1 AESTHETICS

The County has determined that the GPU EIR adequately analyzes impacts on aesthetics for purposes of the CAP because implementation of the CAP would not cause any new significant impacts and would not substantially increase the severity of a significant impact relative to the impacts on aesthetics disclosed in the GPU EIR. The GPU EIR analyzes the environmental impacts of General Plan implementation on aesthetics and visual resources in Chapter 16 (GPU EIR, p. 16-1 et seq.). The summary of GPU EIR impact conclusions presented in Table 1-2 is followed by an evaluation of the impacts of the CAP in the context of the GPU EIR.

Table 1-2: General Plan Update EIR Impact Conclusions for Aesthetics

Significance Criteria	Where Impact Was Analyzed in the GPU EIR	No Impact	Less than Significant Impact	Less than Significant with Mitigation	Significant Unavoidable Impact
The General Plan would have a significant impact on aesthetics if it would:					
a). have a substantial adverse effect on a scenic vista;	GPU EIR pages 16-19 and 16-20				X
b). substantially damage scenic resources, including but not limited to trees, rock outcroppings, and historic buildings within a State scenic highway;	GPU EIR pages 16-19 and 16-20				X
c). substantially degrade the existing visual character or quality of the site and its surroundings; or	GPU EIR pages 16-19 and 16-20				X
d). create a new substantial source of light and glare, which would adversely affect day or nighttime views in the area.	GPU EIR page 16-21				X

The GPU EIR describes the environmental setting, including the visual character of the region, the visual character of Sacramento County, scenic views and resources, and existing sources of light and glare (GPU EIR, p. 16-1 et seq.). New growth areas are identified as West of Watt, Easton, Jackson Highway Corridor, Grant Line East, Infill Development, and Commercial Corridors (GPU EIR, p. 16-3 et seq.). The GPU EIR also describes the regulatory setting, including federal, State, and local laws, regulations, plans, codes, and policies (GPU EIR, p. 16-11 et seq.). No substantial change to the environmental and regulatory settings related to aesthetics has occurred since certification of the GPU EIR.

The GPU EIR analyzes direct, indirect, and cumulative aesthetic impacts of General Plan implementation beginning on page 16-18. The GPU EIR states that implementation of the General Plan would result in substantial project and cumulative visual impacts by changing the existing viewsheds of rural and open space and increasing light and glare in the Jackson Highway Corridor and Grant Line East new-growth areas. No mitigation is available that can offset the visual impacts. Therefore, the GPU EIR concludes that aesthetics project and cumulative impacts would be significant and unavoidable with implementation of the General Plan.

Implementation of the CAP would not cause a new significant impact and would not substantially increase the severity of a significant impact on aesthetic resources as compared to the impacts disclosed in the GPU EIR. Implementation of the CAP could result in adverse effects on aesthetics and visual resources in the unincorporated county. Implementation of CAP measures would have limited potential to change existing viewsheds and increase light and glare in rural and open space areas. CAP measures would include improvements at or near grade level of existing roadways (Measures GHG-11 and GHG-12); would involve minor changes to the exterior of existing buildings including rooflines (Measure GHG-07), as well as planting of new trees (Measure GHG-02); and would not otherwise involve features with substantial height, bulk, or massing that could substantially damage scenic resources. Measure GHG-13 would incentivize infill development. While the CAP does not include specific development proposals, it includes consideration of various project typologies, which would be typical of existing urban development. The fees collected by the County from developers/builders through implementation of Measure GHG-13 would be used to facilitate infill development in urban locations that are already targeted for development under approved plans.

Therefore, no new or substantially more severe effects or contributions to cumulatively considerable aesthetic impacts would occur compared to the impacts identified in the GPU EIR. Aesthetics impacts would remain significant and unavoidable for the reasons disclosed in the GPU EIR but would not be worsened under the project. This issue will not be discussed further in this SEIR.

1.5.2 AGRICULTURE AND FORESTRY RESOURCES

The County has determined that the GPU EIR adequately analyzes impacts on agriculture and forestry resources for purposes of the CAP because implementation of

the CAP would not cause any new significant impacts and would not substantially increase the severity of a significant impact relative to the impacts on agriculture and forestry resources disclosed in the GPU EIR. The GPU EIR analyzes the direct, indirect, and cumulative environmental impacts of General Plan implementation on agriculture and forestry resources in Chapter 3 (GPU EIR, p. 3-1 et seq.). The summary of GPU EIR impact conclusions presented in Table 1-3 is followed by an evaluation of the impacts of the CAP in the context of the GPU EIR.

Table 1-3: General Plan Update EIR Impact Conclusions for Agriculture and Forestry Resources

Significance Criteria	Where Impact Was Analyzed in the GPU EIR	No Impact	Less than Significant Impact	Less than Significant with Mitigation	Significant Unavoidable Impact
The General Plan would have a significant impact on agriculture and forestry resources if it would:					
a). convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use;	GPU EIR pages 3-47 to 3-60				X
b). conflict with existing zoning for agricultural use or a Williamson Act contract;	GPU EIR pages 3-47 to 3-60				X
c). conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g));	Not addressed				
d). result in the loss of forest land or conversion of forest land to non-forest use; or	Not addressed				

Significance Criteria	Where Impact Was Analyzed in the GPU EIR	No Impact	Less than Significant Impact	Less than Significant with Mitigation	Significant Unavoidable Impact
e). involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use.	GPU EIR pages 3-47 to 3-60				X

The GPU EIR analyzes the direct, indirect, and cumulative agricultural impacts of General Plan implementation beginning on page 3-47. The GPU EIR determines that development under the General Plan would affect more than 8,500 acres of designated farmlands. Mitigation Measure LU-6 requires amending General Plan Policies CO-63 and AG-5 to require 1:1 mitigation and establish a farmland mitigation fund to be used to acquire, preserve, and maintain farmlands; however, no feasible mitigation is available that would be sufficient to reduce the impacts of such substantial loss of protected farmlands to less-than-significant levels. The GPU EIR concludes that impacts on agricultural resources would be significant and unavoidable with implementation of the General Plan under project and cumulative conditions. No forestland or timber resources are identified in Sacramento County.

Implementation of the GHG emissions reduction measures in the CAP pertaining to agriculture would establish programs to encourage and support carbon farming practices on existing farmland (Measure GHG-01) and would support urban forestry initiatives within the county (Measure GHG-02). These measures would enhance the use of existing farmland and would increase urban forest. Measure GHG-01 would provide technical support and education to implement carbon farming practices on existing farmland. The County’s implementation of this measure would occur in collaboration with farmers, land managers, and other relevant stakeholders to provide education about technical practices and financial incentives.

In addition, the CAP measures support and enhance existing agricultural land uses to implement carbon farming practices and do not propose development that would cause incompatible land uses, convert Important Farmland to nonagricultural use, or reduce Williamson Act contract acreage. Minor land conversions may be required for infrastructure necessary to implement the CAP measures. Upgraded infrastructure is generally considered compatible with agricultural uses, and all subsequent projects would be subject to the requirements of the Zoning Code. Mitigation measures identified in the GPU EIR and the policies in the 2019 Agricultural Element Update would apply to subsequent projects and minimize the potential for future loss of Important Farmland or farmland under Williamson Act contract. Therefore, the CAP would not result in any new or substantially more severe impacts associated with agricultural resources.

CAP Measure GHG-02 pertaining to urban forestry would be implemented in developed urban environments. Therefore, the CAP would not result in any new or substantially more severe impacts pertaining to conversion, zoning, or land uses incompatible with forest land or timberland.

These agricultural resources impacts would remain significant and unavoidable for the reasons disclosed in the GPU EIR. The CAP would not result in any new or substantially more severe agriculture or forestry impacts or contributions to cumulatively considerable impacts compared to the impacts identified in the GPU EIR. This issue will not be discussed further in this SEIR.

1.5.3 CULTURAL RESOURCES

The County has determined that the GPU EIR adequately analyzes impacts on cultural resources for purposes of the CAP because implementation of the CAP would not cause any new significant impacts and would not substantially increase the severity of a significant impact relative to the impacts on cultural resources disclosed in the GPU EIR. The GPU EIR analyzes the environmental impacts of General Plan implementation on cultural resources in Chapter 15 (GPU EIR, p. 15-1 et seq.). The summary of GPU EIR impact conclusions presented in Table 1-4 is followed by an evaluation of the impacts of the CAP in the context of the GPU EIR.

Table 1-4: General Plan Update EIR Impact Conclusions for Cultural Resources

Significance Criteria	Where Impact Was Analyzed in the GPU EIR	No Impact	Less than Significant Impact	Less than Significant with Mitigation	Significant Unavoidable Impact
The General Plan would have a significant impact on cultural resources if it would:					
a). cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5;	GPU EIR pages 15-25 to 15-26				X
b). cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5; or	GPU EIR pages 15-22 to 15-24				X
c). disturb any human remains, including those interred outside of dedicated cemeteries.	Not addressed				

The GPU EIR analyzes direct, indirect, and cumulative cultural resources impacts of General Plan implementation beginning on page 15-22. The GPU EIR evaluates impacts on historical and archaeological resources from buildout of the General Plan and

determines that impacts would be significant and unavoidable. To address impacts on historical and architectural resources, GPU EIR Mitigation Measure CR-1 requires the addition of policies to encourage adaptive reuse, preservation, and maintenance of historic structures. However, given the uncertainty of future development and associated historical resources impacts at the project-specific level, impacts on historical/architectural resources are considered significant and unavoidable. Similarly, given the uncertainty of future General Plan development and associated archaeological and cultural resource impacts at the project-specific level, no feasible mitigation is available to address impacts on archaeological and cultural resources, and the impacts are determined to be significant and unavoidable. The GPU EIR does not include an analysis related to the potential for buildout of the General Plan to disturb human remains; however, these impacts could have been known at the time the GPU EIR was prepared.

Implementation of the CAP could result in significant impacts on historical and archaeological resources as a result of implementation of GHG measures, including energy efficiency and electrification of existing buildings (Measure GHG-04); future electric vehicle (EV) infrastructure (Measure GHG-07); transit access, improvements to the pedestrian and bicycle networks, and traffic calming measures (Measure GHG-11 and Measure GHG-12); infill development (Measure GHG-13); renewable energy projects on County-owned properties (Measure GHG-03); improvements to solid waste infrastructure (Measure GHG-14); upgrades to stormwater infrastructure (Measure FLOOD-01); improvements to sewage and solid-waste management infrastructure (Measure FLOOD-02); undergrounding of utility lines (Measure FLOOD-07); and restoration of concrete channels (Measure FLOOD-11) within the county.

Projects undertaken to implement the CAP would comply with General Plan policies that encourage protection and adaptive reuse of structures and minimization of impacts on archaeological resources. These activities would be consistent with General Plan Policies CO-150 through CO-160 and CO-164 through CO-168 related to cultural resources protection. Future discretionary projects would also be subject to environmental review under CEQA, which may include project-level review of cultural resource records and architectural analysis and result in the identification of necessary avoidance or mitigation measures to reduce potential impacts. However, compliance with federal, State, and local regulations and General Plan policies cannot ensure that all potential impacts on historical and archaeological resources resulting from CAP implementation would not be substantial. As discussed in the GPU EIR, unforeseeable impacts on historic and archaeological resources may still occur and this project and cumulative impact would be significant and unavoidable.

Although the topic of impacts to human remains is not explicitly addressed in the GPU EIR, it could have been known at the time of preparation of the GPU EIR. There is nothing unique about the projects required for implementation of the CAP measures that would result in a new or more severe impact on human remains than would occur with implementation of the General Plan. Future projects associated with the CAP would be required to comply with California law related to protecting Native American human burials, skeletal remains, and items associated with Native American burials from vandalism and inadvertent destruction. For example, California Health and Safety Code

Section 7050.5 and PRC Section 5097 identify procedures for the treatment of human remains. Compliance with these laws would ensure that the disturbance of human remains would be avoided or minimized and would require appropriate treatment should human remains be discovered. Impacts would be less than significant.

The CAP would not result in any new or substantially more severe cultural resources impacts or contributions to cumulatively considerable impacts described in the GPU EIR. This issue will not be discussed further in this SEIR.

1.5.4 GEOLOGY AND SOILS

The County has determined that the GPU EIR adequately analyzes geology and soils impacts for purposes of the CAP because implementation of the CAP would not cause any new significant impacts and would not substantially increase the severity of a significant impact relative to the geology and soils impacts disclosed in the GPU EIR. The GPU EIR analyzes the environmental impacts of General Plan implementation related to geology and soils in Chapter 13 (GPU EIR, p. 13-1 et seq.) and Chapter 15 (GPU EIR, p. 15-1 et seq.). The summary of GPU EIR impact conclusions presented in Table 1-5 is followed by an evaluation of the impacts of the CAP in the context of the GPU EIR.

Table 1-5: General Plan Update EIR Impact Conclusions for Geology and Soils

Significance Criteria	Where Impact Was Analyzed in the GPU EIR	No Impact	Less than Significant Impact	Less than Significant with Mitigation	Significant Unavoidable Impact
The General Plan would have a significant impact related to geology and soils if it would:					
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: <ul style="list-style-type: none"> i) rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault; ii) strong seismic ground shaking; iii) seismic-related ground failure, including liquefaction; or iv) landslides; 	GPU EIR pages 13-30 to 13-35		X		

Significance Criteria	Where Impact Was Analyzed in the GPU EIR	No Impact	Less than Significant Impact	Less than Significant with Mitigation	Significant Unavoidable Impact
b). result in substantial soil erosion or the loss of topsoil;	GPU EIR pages 13-25 to 13-27		X		
c). be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse;	GPU EIR pages 13-25 to 13-27		X		
d). be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994, as updated), creating substantial direct or indirect risks to life or property;	GPU EIR pages 13-25 to 13-27		X		
e). have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water; or	GPU EIR pages 13-25 to 13-27		X		
f). directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.	GPU EIR pages 15-33 to 15-34				X

No substantial change to the environmental and regulatory settings related to geology and soils, described in GPU EIR Chapter 13, "Geology and Soils," has occurred since certification of the GPU EIR. The GPU EIR analyzes the geology and soils impacts of General Plan implementation beginning on page 13-25. Impacts on paleontological resources are analyzed beginning on page 15-33. The GPU EIR evaluates the potential direct, indirect, and cumulative geology and soils impacts related to erosion, seismicity, and unstable soils. The GPU EIR states that compliance with a combination of existing County ordinances and State laws (such as the Uniform Building Code) would ensure that future development would not cause substantial erosion, would not be subject to substantial hazards associated with seismicity, and would not be subject to substantial hazards associated with unstable or expansive soils. Therefore, the GPU EIR concludes that geology and soils impacts would be less than significant under project and cumulative conditions. Impacts on paleontological resources would be significant and unavoidable under project and cumulative conditions because of the potential for an accidental discovery of undocumented resources.

Implementation of the CAP would support future EV infrastructure (Measure GHG-07); transit access, improvements to the pedestrian and bicycle networks, and traffic calming measures (Measure GHG-11 and Measure GHG-12); infill development (Measure GHG-13); renewable energy projects on County-owned properties (Measure GHG-03); and improvements to solid waste infrastructure (Measure GHG-14). The CAP would also include climate adaptation measures to upgrade stormwater infrastructure (Measure FLOOD-01), improve sewage and solid-waste management infrastructure (Measure FLOOD-02), underground utility lines (Measure FLOOD-07), and restore concrete channels (Measure FLOOD-11) within the county. These activities would be consistent with General Plan Policies SA-1, SA-3, and SA-4 to minimize the loss of life, injury, and property damage from seismic and geological hazards by preparing geotechnical reports, investigating seismic and geological hazards, and requiring setbacks from steep slopes. These activities would also be required to comply with provisions for geological stability established by the Uniform Building Code and California Building Code, and with provisions for soil and geological stability established by Sacramento County Code Chapter 16.44. In addition, the CAP would not amend, revise, or be inconsistent with any existing regulations related to geologic hazards and soils. Compliance with existing regulations and General Plan policies would ensure that project and cumulative geology and soils impacts would be less than significant.

Implementation of CAP Measures GHG-03, GHG-07, GHG-11 through GHG-14, FLOOD-02, FLOOD-07, and FLOOD-11 (discussed above) could disturb paleontological resources during ground-disturbing activities. These activities would be consistent with General Plan Policies CO-161, CO-162, and CO-163 related to protection of paleontological resources. In addition, the CAP would not amend, revise, or be inconsistent with any existing regulations related to paleontological resources. As discussed in the GPU EIR, unforeseeable impacts on paleontological resources may still occur and this impact would be significant and unavoidable.

The CAP would not result in any new or substantially more severe impacts or contributions to cumulatively considerable impacts compared to the impacts identified in the GPU EIR. This issue will not be discussed further in this SEIR.

1.5.5 HAZARDS AND HAZARDOUS MATERIALS

The County has determined that the GPU EIR adequately analyzes impacts related to hazards and hazardous materials for purposes of the CAP because implementation of the CAP would not cause any new significant impacts and would not substantially increase the severity of a significant impact relative to the impacts related to hazards and hazardous materials disclosed in the GPU EIR. The GPU EIR analyzes the direct, indirect, and cumulative environmental impacts of General Plan implementation related to hazards and hazardous materials in Chapter 14 (GPU EIR, p. 16-1 et seq.) and Chapter 17 (GPU EIR, p. 17-1 et seq.). The summary of GPU EIR impact conclusions presented in Table 1-6 is followed by an evaluation of the impacts of the CAP in the context of the GPU EIR.

Table 1-6: General Plan Update EIR Impact Conclusions for Hazards and Hazardous Materials

Significance Criteria	Where Impact Was Analyzed in the GPU EIR	No Impact	Less than Significant Impact	Less than Significant with Mitigation	Significant Unavoidable Impact
The General Plan would have a significant impact related to hazards and hazardous materials if it would:					
a) create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials;	GPU EIR page 14-12	X			
b). create a significant hazard to the public or the environment through reasonably foreseeable upset and/or accident conditions involving the release of hazardous materials into the environment;	GPU EIR pages 14-13 to 14-14, 14-16, and 14-17		X		
c). emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school;	GPU EIR page 14-12	X			
d). be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment;	GPU EIR pages 14-13 to 14-14		X		
e). for a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area;	GPU EIR pages 3-61 to 3-63 GPU EIR pages 10-18 to 10-19		X		

Significance Criteria	Where Impact Was Analyzed in the GPU EIR	No Impact	Less than Significant Impact	Less than Significant with Mitigation	Significant Unavoidable Impact
f). impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan; or	Not addressed				
g). expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires.	Not addressed				

The GPU EIR analyzes hazards and hazardous materials impacts of General Plan implementation in Chapter 3 (pages 3-61 to 3-63), Chapter 10 (pages 10-18 and 10-19), and Chapter 14 (pages 14-12 to 14-17). The GPU EIR states that implementation of the General Plan does not involve the generation, transportation, or emission of hazardous substances. The GPU EIR evaluates the potential for impacts related to locating future development near known hazardous sites and conditions. Because cleanup of hazardous sites would be required before development and application of current laws and regulations would ensure that any contaminated sites are identified and contained or remediated before development, the GPU EIR concludes that project and cumulative impacts would be less than significant.

Future projects under the CAP would result in the routine transport, storage, use, and disposal of hazardous materials and would have the potential to create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. However, future projects would be required to comply with all applicable federal, State, and local regulations during construction and operation, and to obtain permits and comply with appropriate regulatory agency standards designed to avoid releases of hazardous materials. Furthermore, existing regulations preclude the development of any known cleanup site until the hazardous condition has been abated to the point that the proposed use would neither aggravate nor be adversely affected by the hazardous condition. Future projects would be required to comply with applicable airport land use compatibility plans (ALUCPs) to ensure that people would not be exposed to excessive airport noise. Facilities that use hazardous materials are required to obtain permits and comply with appropriate regulatory agency standards designed to avoid hazardous materials releases.

Project and cumulative impacts would remain less than significant for the reasons disclosed in the GPU EIR. Given compliance with existing regulations, future projects that implement CAP measures would not result in any new or substantially more severe hazardous and hazardous materials impacts or contributions to cumulatively considerable impacts compared to the impacts identified in the GPU EIR. This issue will not be discussed further in this SEIR.

1.5.6 HYDROLOGY AND WATER QUALITY

The County has determined that the GPU EIR adequately analyzes impacts related to hydrology and water quality for purposes of the CAP because implementation of the CAP would not cause any new significant impacts and would not substantially increase the severity of a significant impact relative to the hydrology and water quality impacts disclosed in the GPU EIR. The GPU EIR analyzes the environmental impacts of General Plan implementation related to hydrology and water quality in Chapter 6 (GPU EIR, p. 6-1 et seq.) and Chapter 7 (GPU EIR, p. 7-1 et seq.). The summary of GPU EIR impact conclusions presented in Table 1-7 is followed by an evaluation of the impacts of the CAP in the context of the GPU EIR.

Table 1-7: General Plan Update EIR Impact Conclusions for Hydrology and Water Quality

Significance Criteria	Where Impact Was Analyzed in the GPU EIR	No Impact	Less than Significant Impact	Less than Significant with Mitigation	Significant Unavoidable Impact
The General Plan would have a significant impact related to hydrology and water quality if it would:					
a) violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality;	GPU EIR pages 7-51 to 7-57				X
b). substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin;	GPU EIR pages 6-53 to 6-66				X
c). substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would: i) result in substantial on- or offsite erosion or siltation;	GPU EIR pages 7-51 to 7-57				X
c). ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	GPU EIR pages 7-21 to 7-27		X		

Significance Criteria	Where Impact Was Analyzed in the GPU EIR	No Impact	Less than Significant Impact	Less than Significant with Mitigation	Significant Unavoidable Impact
c). iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	GPU EIR pages 7-51 to 7-57 and 7-21 to 7-27		X		
c). iv) impede or redirect flood flows;	GPU EIR pages 7-21 to 7-27		X		
d). in flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation; or	GPU EIR pages 7-27 to 7-51		X		
e). conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.	GPU EIR pages 7-51 to 7-57 GPU EIR pages 6-53 to 6-66				X

The GPU EIR analyzes the direct, indirect, and cumulative hydrology and water quality impacts of General Plan implementation in Chapter 6 (pages 6-53 to 6-66) and Chapter 7 (pages 7-21 to 7-57), respectively. To address floodplain impacts, GPU EIR Mitigation Measure HY-1 requires including new policy language to preclude development in affected areas until the levees are improved to the 200-year flood level. Floodplain impacts would be reduced to a less-than-significant level. To address water quality impacts, GPU EIR Mitigation Measure HY-2 requires including new policy language to develop appropriate stormwater treatment measures for small development and redevelopment projects. However, it is infeasible to expect zero net increase in water pollution because of General Plan implementation, and any net increase in an impaired waterway would be a significant impact. The GPU EIR therefore concludes that water quality impacts would be significant and unavoidable under project and cumulative conditions.

Implementation of the CAP would support future EV infrastructure (Measure GHG-07); transit access, improvements to the pedestrian and bicycle networks, and traffic calming measures (Measure GHG-11 and Measure GHG-12); infill development (Measure GHG-13); renewable energy projects on County-owned properties (Measure GHG-03); and improvements to solid waste infrastructure (Measure GHG-14) within the county. The CAP would also include climate adaptation measures to upgrade stormwater infrastructure (Measure FLOOD-01), improve sewage and solid-waste management infrastructure (Measure FLOOD-02), underground utility lines (Measure FLOOD-07), and restore concrete channels (Measure FLOOD-11) within the county. Development of these projects would be required to comply with General Plan Policies CO-24, CO-27,

CO-28, CO-29, CO-30, CO-31, and CO-32 to manage the quality and quantity of urban runoff to protect beneficial uses of surface water and groundwater. These activities would also be required to comply with the Sacramento County Stormwater Ordinance (Sacramento County Code Chapter 15.12) and Land Grading and Erosion Control Ordinance (Sacramento County Code Chapter 16.44) and implement an erosion and sediment control plan, best management practices, and National Pollutant Discharge Elimination System requirements.

Implementation of the CAP would not decrease water supply because it does not include projects that would substantially increase impervious surfaces or require the use of groundwater. The CAP would support future infill development (Measure GHG-13) and increase water efficiency (Measure GOV-5). Overall, the CAP could benefit groundwater supplies and is not anticipated to substantially interfere with implementation of groundwater sustainability plans pursuant to the Sustainable Groundwater Management Act. Future activities under the CAP would also comply with the Sacramento County Floodplain Management Ordinance, which requires an analysis of the effects of grading on the surrounding area, including identification and preservation of floodplain storage.

Implementation of the CAP would not result in any substantial changes to impacts related to water quality, stormwater runoff, or flooding. The CAP would not result in any new or substantially more severe hydrology and water quality impacts or contributions to cumulatively considerable impacts compared to the impacts identified in the GPU EIR. This issue will not be discussed further in this SEIR.

1.5.7 LAND USE AND PLANNING

The County has determined that the GPU EIR adequately analyzes impacts related to land use and planning for purposes of the CAP because implementation of the CAP would not cause any new significant impacts and would not substantially increase the severity of a significant impact relative to the land use and planning impacts disclosed in the GPU EIR. The GPU EIR analyzes the environmental impacts of General Plan implementation related to land use and planning in Chapter 3 (GPU EIR, p. 3-1 et seq.). The summary of GPU EIR impact conclusions presented in Table 1-8 is followed by an evaluation of the impacts of the CAP in the context of the GPU EIR.

Table 1-8: General Plan Update EIR Impact Conclusions for Land Use and Planning

Significance Criteria	Where Impact Was Analyzed in the GPU EIR	No Impact	Less than Significant Impact	Less than Significant with Mitigation	Significant Unavoidable Impact
The General Plan would have a significant impact related to land use planning if it would:					
a) physically divide an established community; or	GPU EIR page 3-47		X		
b). cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.	GPU EIR pages 3-22 to 3-29 and 3-35 to 3-44				X

The GPU EIR analyzes the direct, indirect, and cumulative land use and planning impacts of General Plan implementation beginning on page 3-22. Because the General Plan does not include any elements that would result in significant division or disruption of an established community, the GPU EIR concludes that implementation of the General Plan would result in less-than-significant impacts related to physical division of an established community. The GPU EIR determines that logical phasing of development can reduce the significant impacts of new growth to a less-than-significant level but may not be sufficient for all growth areas. Therefore, the potential to cause a significant environmental impact due to a conflict with an applicable land use plan, policy, or regulation would be significant and unavoidable.

The GHG emissions reduction and resiliency measures identified in the CAP would not result in development that could physically divide a community. Implementation of the CAP would not divide an established community because the strategic framework would not result in development projects that would alter local land use patterns or obstruct movement through established neighborhoods. The CAP implements mitigation identified and conceptually analyzed in the GPU EIR. The CAP is consistent with the County's adopted land use plan. The CAP is consistent with GPU EIR Mitigation Measure CC-2, Part B, which requires that the County adopt a second-phase CAP "that includes economic analysis and detailed programs and performance measures, including timelines and the estimated amount of reduction expected from each measure." Therefore, the CAP is consistent with the General Plan, and CAP implementation would not conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigation an environmental effect.

This impact would remain less than significant for the reasons disclosed in the GPU EIR. The CAP would not result in any new or substantially more severe land use and planning impacts or contributions to cumulatively considerable impacts compared to the impacts identified in the GPU EIR. This issue will not be discussed further in this SEIR.

1.5.8 MINERAL RESOURCES

The County has determined that the GPU EIR adequately analyzes impacts on mineral resources for purposes of the CAP because implementation of the CAP would not cause any new significant impacts and would not substantially increase the severity of a significant impact relative to the impacts on mineral resources disclosed in the GPU EIR. The GPU EIR analyzes the environmental impacts of General Plan implementation on mineral resources in Chapter 13 (GPU EIR, p. 13-1 et seq.). The summary of GPU EIR impact conclusions presented in Table 1-9 is followed by an evaluation of the impacts of the CAP in the context of the GPU EIR.

Table 1-9: General Plan Update EIR Impact Conclusions for Mineral Resources

Significance Criteria	Where Impact Was Analyzed in the GPU EIR	No Impact	Less than Significant Impact	Less than Significant with Mitigation	Significant Unavoidable Impact
The General Plan would have a significant impact on mineral resources if it would:					
a) result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State; or	GPU EIR pages 13-27 to 13-28				X
b). result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan.	GPU EIR pages 13-27 to 13-28				X

No substantial change to the environmental and regulatory settings related to mineral resources, described in GPU EIR Chapter 13, “Geology and Soils,” has occurred since certification of the GPU EIR. The GPU EIR analyzes direct, indirect, and cumulative mineral resources impacts of General Plan implementation beginning on page 13-27. The GPU EIR identifies that only a relatively small portion of the county lies over known, high-quality mineral resources that are available for extraction. Aggregate resources are present within the Jackson Highway Corridor new-growth area. Implementation of the General Plan would include development of the Jackson Highway Corridor area, which would have the potential to result in obstruction of access to and removal of mineral resources. Because the aggregate resources in this location are extensive and the resource itself is not renewable, the GPU EIR concludes that impacts on mineral resources would be significant and unavoidable under project and cumulative conditions.

Implementation of the CAP would support future EV infrastructure (Measure GHG-07); transit access, improvements to the pedestrian and bicycle networks, and traffic calming measures (Measure GHG-11 and Measure GHG-12); infill development (Measure

GHG-13); renewable energy projects on County-owned properties (Measure GHG-03); and improvements to solid waste infrastructure (Measure GHG-14) within the county. The CAP also includes climate adaptation measures to upgrade stormwater infrastructure (Measure FLOOD-01), improve sewage and solid-waste management infrastructure (Measure FLOOD-02), underground utility lines (Measure FLOOD-07), and restore concrete channels (Measure FLOOD-11) within the county.

Future projects under the CAP would be subject to General Plan policies and regulations designed to encourage the protection of mineral resources—specifically, Policy CO-44, to avoid the loss of mineral resources. The CAP would not amend, revise, or be inconsistent with any existing regulations related to mineral resources. Therefore, the CAP would not result in any new or substantially more severe mineral resources impacts or contributions to cumulatively considerable impacts compared to the impacts identified in the GPU EIR. This issue will not be discussed further in this SEIR.

1.5.9 NOISE AND VIBRATION

The County has determined that the GPU EIR adequately analyzes noise impacts for purposes of the CAP because implementation of the CAP would not cause any new significant impacts and would not substantially increase the severity of a significant impact relative to the noise impacts disclosed in the GPU EIR. The GPU EIR analyzes the environmental impacts of General Plan implementation related to noise in Chapter 10 (GPU EIR, p. 10-1 et seq.). The summary of GPU EIR impact conclusions presented in Table 1-10 is followed by an evaluation of the impacts of the CAP in the context of the GPU EIR.

Table 1-10: General Plan Update EIR Impact Conclusions for Noise and Vibration

Significance Criteria	Where Impact Was Analyzed in the GPU EIR	No Impact	Less than Significant Impact	Less than Significant with Mitigation	Significant Unavoidable Impact
The General Plan would have a significant impact related to noise and vibration if it would:					
a). generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or in other applicable local, State, or federal standards;	Temporary noise impact not addressed. Permanent noise impact: GPU EIR pages 10-15 to 10-17 and 10-22 to 10-24				X
b). generate excessive groundborne vibration or groundborne noise levels; or	Not addressed				

Significance Criteria	Where Impact Was Analyzed in the GPU EIR	No Impact	Less than Significant Impact	Less than Significant with Mitigation	Significant Unavoidable Impact
c). for a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, expose people residing or working in the project area to excessive noise levels.	GPU EIR pages 10-18 to 10-21		X		

No substantial change to the environmental and regulatory settings related to noise, described in GPU EIR Chapter 10, "Noise," has occurred since certification of the GPU EIR. The GPU EIR analyzes direct, indirect, and cumulative noise impacts of General Plan implementation beginning on page 10-15. The proposed General Plan Policies NO-9 and NO-15 do not include a maximum allowable noise threshold for long-term noise exposure for non-industrial uses. GPU EIR Mitigation Measure NO-1 requires that both policies be revised to include language establishing an upper noise ceiling of 75 decibels in any area where it is reasonable to expect long-term noise exposure (except in industrial areas, where higher noise levels are expected and planned for through the use of proper hearing protection). Implementation of Mitigation Measure NOI-1 would reduce long-term noise impacts to a less-than-significant level under project and cumulative conditions.

Impacts related to construction noise and vibration are not evaluated in the GPU EIR. Compliance with the applicable ALUCPs would ensure that people residing or working near airports would not be exposed to excessive airport noise. Therefore, the GPU EIR determines that airport noise impacts would be less than significant under project and cumulative conditions. The GPU EIR states that implementation of the General Plan would increase vehicle noise in areas already inconsistent with General Plan policy and would cause additional areas to become exposed to noise, inconsistent with General Plan policy. No reasonable or feasible mitigation is available that would reduce this impact in all areas with existing development. Therefore, the GPU EIR concludes that impacts related to vehicle noise would be significant and unavoidable under project and cumulative conditions.

Implementation of the CAP could involve development of energy projects (Measure GHG-03), installation of EV chargers (Measure GHG-07), improvements to transportation infrastructure (Measures GHG-11 and GHG-12), infill development (Measure GHG-13), and electrification of County buildings and facilities (Measure GOV-04). Implementation of the CAP's climate adaptation measures would have the potential to result in construction activities to upgrade stormwater infrastructure (Measure FLOOD-01), improve sewage and solid-waste management infrastructure (Measure FLOOD-02), underground utility lines (Measure FLOOD-07), and restore concrete channels (Measure FLOOD-11) within the county.

Implementation of the CAP could result in short-term noise impacts, depending on the scale and nature of construction activities. Future projects under the CAP could require the use of heavy-duty construction equipment, worker vehicle trips, and truck hauling trips. These construction activities could involve bulldozers or other pieces of equipment or activities that would produce substantial groundborne vibration or noise. However, construction of infrastructure and development to implement the CAP in the unincorporated county would be exempt from maximum noise level requirements, provided that the associated construction activities would not take place during the hours specified in County Code Section 6.68.090(e), which limits the level of noise exposure to surrounding sensitive receptors. Vibration levels dissipate rapidly at increasing distance from the vibration source and actual exposure levels would depend on equipment types, haul truck routes, and proximity to and characteristics of sensitive receptors, which cannot be known until a project-level analysis has been completed. Although the topic is not explicitly addressed in the GPU EIR, there is nothing unique about the projects required for implementation of the CAP measures that would result in a new or more severe impact than would occur with implementation of the General Plan. Future discretionary projects would be required to evaluate project-specific impacts under CEQA at the time of application, and project-specific mitigation would be required to minimize or avoid vibration impacts to the extent feasible.

Implementation of the CAP would not result in increases in operational noise sources because the CAP measures would not result in the development of substantial stationary noise sources. Further, the GPU EIR evaluates the contribution of long-term operational noise sources to increased vehicle noise, and the CAP would not result in a more severe impact than what was described in the GPU EIR because the CAP strives to reduce projected VMT. Additionally, discretionary projects that must implement CAP measures would be required to undergo project-level environmental review to analyze potential noise impacts and identify feasible mitigation to reduce such impacts. Implementation of the CAP would not result in increased exposure to people residing or working in the project area to excessive airport noise levels because any development would be required to demonstrate consistency with the applicable ALUCPs, which include policies and regulations to address airport noise.

This impact would remain less than significant for the reasons disclosed in the GPU EIR. The CAP would not result in any new or substantially more severe noise and vibration impacts or contributions to cumulatively considerable impacts compared to the impacts identified in the GPU EIR. This issue will not be discussed further in this SEIR.

1.5.10 POPULATION AND HOUSING

The County has determined that the GPU EIR adequately analyzes population and housing impacts for purposes of the CAP because implementation of the CAP would not cause any new significant impacts and would not substantially increase the severity of a significant impact relative to the population and housing impacts disclosed in the GPU EIR. The GPU EIR analyzes the environmental impacts of General Plan implementation related to population and housing in Chapter 3 (GPU EIR, p. 3-1 et seq.) and Chapter 17 (GPU EIR, pp. 17-16 and 17-17). The summary of GPU EIR impact conclusions presented in Table 1-11 is followed by an evaluation of the impacts of the CAP in the context of the GPU EIR.

Table 1-11: General Plan Update EIR Impact Conclusions for Population and Housing

Significance Criteria	Where Impact Was Analyzed in the GPU EIR	No Impact	Less than Significant Impact	Less than Significant with Mitigation	Significant Unavoidable Impact
The General Plan would have a significant impact related to population and housing if it would:					
a) induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure); or	GPU EIR page 17-16.	X			
b). displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.	GPU EIR pages 3-60 and 3-61.		X		

As discussed under “Growth-Inducing Impacts” in Chapter 17, “Summary of Impacts and Their Disposition,” of the GPU EIR (page 17-16), projected growth in the county is planned for in the General Plan and analyzed in the GPU EIR. To accommodate the growth anticipated in the General Plan, construction of new facilities (e.g., schools, parks, fire stations) and infrastructure (e.g., roads, sewer lines, water lines) may be required. However, none of this infrastructure would accommodate more growth within the county than is planned for and analyzed in the GPU EIR. Therefore, the GPU EIR concludes that implementation of the General Plan would not directly or indirectly induce a substantial amount of unplanned growth in the area.

The GPU EIR analyzes direct, indirect, and cumulative housing displacement impacts resulting from General Plan implementation on pages 3-60 and 3-61. Implementation of the General Plan may displace housing for potential new or expanded roadways. However, the amount of housing that may be displaced would be far outweighed by the amount of housing projected to be accommodated by implementation of the General Plan. The GPU EIR concludes that impacts of the construction of unplanned replacement housing resulting from displacement of people would be less than significant under project conditions and less than cumulatively considerable under cumulative conditions.

Implementation of the CAP would not induce population growth or displace people or housing, because the GHG emissions reduction measures do not propose new housing, nor do they propose changes to policies or regulations related to land use or residential zoning. Measure GHG-13 would incentivize infill development, but the CAP would not result in development proposals with a population-generating component. The fees

collected by the County from developers/builders through implementation of Measure GHG-13 would be used to facilitate infill development in urban locations that are already targeted for development. Moreover, this pattern of development is consistent with the assumptions in the GPU EIR and related planning documents.

A temporary increase in the number of construction workers could be required for the CAP measures that would facilitate construction of future EV infrastructure (Measure GHG-07); transit access, improvements to the pedestrian and bicycle networks, and traffic calming measures (Measure GHG-11 and Measure GHG-12); renewable energy projects on County-owned properties (Measure GHG-03); stormwater infrastructure upgrades (Measure FLOOD-01); sewage and solid-waste management infrastructure improvements (Measure FLOOD-02); undergrounding of utility lines (Measure FLOOD-07); and restoration of concrete channels (Measure FLOOD-11) within the county. Construction workers would likely be from the Sacramento County area; permanent, substantial relocation of workers would not be required.

This impact would remain less than significant for the reasons disclosed in the GPU EIR. The CAP would not result in any new or substantially more severe impacts related to population and housing or contributions to cumulatively considerable impacts compared to the impacts identified in the GPU EIR. This issue will not be discussed further in this SEIR.

1.5.11 TRIBAL CULTURAL RESOURCES

AB 52 (Chapter 532, Statutes of 2014) established a formal consultation process for California Native American Tribes as part of CEQA (PRC Section 21080.3.1) and stated that a substantial adverse change in the significance of a tribal cultural resource is a significant effect on the environment (PRC Section 21084.2). AB 52 consultation requirements went into effect on July 1, 2015, for all projects that had not already published a Notice of Intent to Adopt a Negative Declaration or Mitigated Negative Declaration or published a Notice of Preparation of an EIR before that date (Section 11[c], Chapter 532, Statutes of 2014). “[A]mendments to the guidelines apply prospectively only” (CEQA Guidelines Section 15007). CEQA documents must meet the “content requirements in effect when the document was set out for public review,” and “shall not need to be revised to conform to any new content requirements in guideline amendments taking effect before the document is finally approved.”

The NOP for the GPU EIR was published on August 13, 2007, before the effective date of this requirement. As a result, the GPU EIR does not identify any tribal cultural resources or potential impacts.

However, tribal consultation was conducted as part of the CAP SEIR. To initiate the tribal consultation process in conjunction with this SEIR, the County sent consultation letters to the Lone Band of Miwok Indians, the United Auburn Indian Community of the Auburn Rancheria, and Wilton Rancheria in January 2024. The County did not receive any requests for tribal consultation in response to the AB 52 notification letters. As a result, no tribal cultural resources have been identified relative to this project.

There is nothing unique about the projects required for implementation of the CAP measures that would result in a new or more severe impact on human remains than would occur with implementation of the General Plan.

Implementation of the CAP could result in significant impacts on tribal cultural resources from implementation of ground-disturbing GHG measures, including future EV infrastructure (Measure GHG-07); transit access, improvements to the pedestrian and bicycle networks, and traffic calming measures (Measure GHG-11 and Measure GHG-12); infill development (Measure GHG-13); renewable energy projects on County-owned properties (Measure GHG-03); improvements to solid waste infrastructure (Measure GHG-14); upgrades to stormwater infrastructure (Measure FLOOD-01); improvements to sewage and solid-waste management infrastructure (Measure FLOOD-02); undergrounding of utility lines (Measure FLOOD-07); and restoration of concrete channels (Measure FLOOD-11) within the county.

Projects undertaken to implement the CAP would comply with General Plan policies that encourage the protection of tribal cultural resources (Policies CO-150 through CO-160 and CO-164). Future discretionary projects would also be subject to environmental review under CEQA, which may include project-level cultural resource records review and tribal consultation and could result in the identification of avoidance or mitigation measures to reduce potential impacts. PRC Section 21084.3 provides a menu of measures that can be used to avoid or minimize impacts on tribal cultural resources where the lead agency determines that a project may cause a substantial adverse change to a tribal cultural resource:

- (1) Avoidance and preservation of the resources in place, including, but not limited to, planning and construction to avoid the resources and protect the cultural and natural context, or planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
- (2) Treating the resource with culturally appropriate dignity taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
 - (A) Protecting the cultural character and integrity of the resource.
 - (B) Protecting the traditional use of the resource.

The regulatory environment has changed since the GPU EIR was prepared; however, tribal cultural resources would not be affected by implementation of the CAP, and the measures and actions in the CAP would generally result in physical improvements in areas that are already disturbed and developed. The potential presence of and impacts on tribal cultural resources can and should have been known at the time of preparation of the GPU EIR. The CAP would not result in any new impacts or contributions to cumulatively considerable impacts. This issue will not be discussed further in this SEIR.

1.5.12 PUBLIC SERVICES AND RECREATION

The County has determined that the GPU EIR adequately analyzes impacts on public services and recreation for purposes of the CAP because implementation of the CAP would not cause any new significant impacts and would not substantially increase the severity of a significant impact relative to the public services and recreation impacts disclosed in the GPU EIR. The GPU EIR analyzes the environmental impacts of General Plan implementation related to public services and recreation in Chapter 4 (GPU EIR, p. 4-1 et seq.). The summary of GPU EIR impact conclusions presented in Table 1-12 is followed by an evaluation of the impacts of the CAP in the context of the GPU EIR.

Table 1-12: General Plan Update EIR Impact Conclusions for Public Services and Recreation

Significance Criteria	Where Impact Was Analyzed in the GPU EIR	No Impact	Less than Significant Impact	Less than Significant with Mitigation	Significant Unavoidable Impact
The General Plan would have a significant impact related to public services and recreation if it would:					
a). result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:	GPU EIR pages 4-27 and 4-28		X		
fire protection,					
police protection,	GPU EIR page 4-26		X		
schools,	GPU EIR pages 4-22 and 4-23		X		
parks,	GPU EIR pages 4-30 and 4-31		X		
other public facilities;	GPU EIR pages 4-24 and 4-25		X		

Significance Criteria	Where Impact Was Analyzed in the GPU EIR	No Impact	Less than Significant Impact	Less than Significant with Mitigation	Significant Unavoidable Impact
b). increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated;	GPU EIR pages 4-30 and 4-31		X		
c). include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment.	GPU EIR pages 4-30 and 4-31		X		

The GPU EIR evaluates direct, indirect, and cumulative impacts related to public services and recreation beginning on page 4-22. The GPU EIR concludes that complying with General Plan policies would ensure that impacts related to public services and recreation would be less than significant under project conditions and less than cumulatively considerable under cumulative conditions. Specifically, General Plan Policies PF-61, PF-62, PF-63, and PF-64 direct the County to ensure adequate fire protection and emergency services; Policy PF-51 directs the County to plan and develop law enforcement facilities to keep up with the needs and distribution of growth; Policies PF-27, PF-29, PF-30, and PF-31 direct the County to require that school siting and design be a key element of neighborhood planning efforts; Policy PF-40 directs the County to require that new and remodeled library facilities meet adopted standards for size, materials and equipment, and programs commensurate with the service population; and Policy PF-124 requires new subdivisions to provide sufficient parks acreage to meet the community's long-range needs.

Implementation of the CAP would not directly affect the provision of fire protection, emergency services, police services, schools, libraries, and park and recreation facilities, nor would it contribute to population growth that could increase the use of existing public services facilities, resulting in the physical deterioration of such facilities. Measure GHG-13 would incentivize infill development, but the CAP would not result in development proposals with a population-generating component. The fees collected by the County from developers/builders through implementation of GHG-13 would be used to facilitate infill development in urban locations that are already targeted for development. Further, future projects would be required to comply with General Plan Policies PF-27, PF-29, PF-30, PF-31, PF-40, PF-51, PF-61 through PF-64, and PF-124, which would ensure that adequate public services and recreation facilities would be available to accommodate future projects under the CAP.

This impact would remain less than significant for the reasons disclosed in the GPU EIR. Implementation of the CAP would not result in any new or substantially more severe impacts related to public services and recreation or contributions to cumulatively considerable impacts compared to the impacts identified in the GPU EIR. This issue will not be discussed further in this SEIR.

1.5.13 UTILITIES AND SERVICE SYSTEMS

The County has determined that the GPU EIR adequately analyzes impacts on utilities and service systems for purposes of the CAP because implementation of the CAP would not cause any new significant impacts and would not substantially increase the severity of a significant impact relative to the utilities and service systems impacts disclosed in the GPU EIR. The GPU EIR analyzes the environmental impacts of General Plan implementation on utilities and service systems in Chapter 4 (GPU EIR, pp. 4-21, 4-22, 4-28, and 4-29), Chapter 5 (GPU EIR, pp. 5-13 to 5-20), Chapter 6 (GPU EIR, pp. 6-29 to 6-53), and Chapter 9 (GPU EIR, pp. 7-21 to 7-27). The summary of GPU EIR impact conclusions presented in Table 1-13 is followed by an evaluation of the impacts of the CAP in the context of the GPU EIR.

Table 1-13: General Plan Update EIR Impact Conclusions for Utilities and Service Systems

Significance Criteria	Where Impact Was Analyzed in the GPU EIR	No Impact	Less than Significant Impact	Less than Significant with Mitigation	Significant Unavoidable Impact
The General Plan would have a significant impact on utilities and service systems if it would:					
a). require or result in the relocation or construction of construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental effects;	GPU EIR pages 4-28 to 4-29, 5-13 to 5-20, 6-29 to 6-53, and 7-21 to 7-27				X
b). have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years;	GPU EIR pages 6-29 to 6-53				X

Significance Criteria	Where Impact Was Analyzed in the GPU EIR	No Impact	Less than Significant Impact	Less than Significant with Mitigation	Significant Unavoidable Impact
c). result in a determination by the wastewater treatment provider that serves or may serve the project that it has adequate capacity to serve the project's projected demand, in addition to the provider's existing commitments;	GPU EIR pages 5-13 to 5-18		X		
d). generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals; or	GPU EIR pages 4-21 and 4-22		X		
e). comply with federal, State, and local management and reduction statutes and regulations related to solid waste.	GPU EIR pages 4-21 and 4-22		X		

The GPU EIR evaluates direct, indirect, and cumulative impacts related to utilities and service systems in Chapter 4, "Public Services"; Chapter 5, "Sewer Services"; Chapter 6, "Water Supply"; and Chapter 7, "Hydrology and Water Quality." The GPU EIR concludes that implementation of the General Plan would result in significant and unavoidable impacts related to water supplies and associated infrastructure under project and cumulative conditions. The GPU EIR reaches this conclusion because all affected water purveyors are likely to need additional conveyance infrastructure to serve new development, and several water purveyors (e.g., California American Water, Florin County Water District, and Sacramento County Water Agency Zone 40) would need to obtain additional water supply to serve anticipated growth within their service areas.

The GPU EIR concludes that impacts associated with wastewater treatment capacity would be less than significant under project conditions. However, when combined with other developments in the cities of Elk Grove, Sacramento, and Rancho Cordova, the Sacramento Regional Wastewater Treatment Plant would not have enough capacity to serve the cumulative developments. Therefore, the GPU EIR concludes that the cumulative impacts related to wastewater treatment capacity would be significant and unavoidable. The GPU EIR states that the Kiefer Landfill has the capacity to meet solid waste demands generated by implementation of the General Plan. Therefore, the GPU EIR concludes that impacts related to solid waste disposal under project and cumulative conditions would be less than significant.

Implementation of the CAP would not involve development or induce population growth in an area that would increase demand for expanded utility services, water, wastewater treatment, and solid waste landfill infrastructure. Measure GHG-13 would incentivize infill development, but the CAP would not result in development proposals with a population-generating component. The fees collected by the County from developers/builders through implementation of Measure GHG-13 would be used to facilitate infill development in urban locations that are already targeted for development. Further, because the CAP includes measures intended to reduce water use (Measure GOV-05) and increase energy efficiency (Measures GHG-04 and GOV-04), the CAP would likely reduce future demand for new or expanded utility infrastructure. Measure GOV-05 would improve water efficiency through the formal adoption of a water efficiency plan to reduce potable water usage at County buildings and facilities, replacement of water-wasting equipment, and use of recycled water for landscaping. Implementation of Measures GHG-04 and GOV-04 would increase energy efficiency and electrify buildings. With Measure GOV-04, the County would adopt an Electric Building Policy to ban natural gas infrastructure in new County buildings. In addition, implementation of Measure GHG-14 would increase the diversion of organic waste deposited into landfills and reduce the amount of solid waste transported to the landfills.

The CAP would not include measures that would result in the construction of new restroom facilities. However, depending on the duration and location of future projects, the project proponent may supply portable restrooms for use by work crews. Portable restrooms are self-contained and would be cleaned periodically, and the waste would be hauled off-site to a wastewater treatment facility for disposal. This service is typically provided by an independent contractor permitted to handle, haul, and dispose of sanitary sewage. Pursuant to Code of Federal Regulations Title 40, Part 403.5, hauled waste must be disposed of at a designated publicly owned treatment facility. Typically, publicly owned treatment facilities are responsible for implementing permit programs for hauled waste and ensuring that adequate treatment capacity exists.

The CAP would not result in any new or substantially more severe impacts related to utilities and service systems or contributions to cumulatively considerable impacts compared to the impacts identified in the GPU EIR. This issue will not be discussed further in this SEIR.

1.5.14 WILDFIRE

The GPU EIR does not include a discussion of wildfire impacts; however, wildfire impacts could have been known at the time of preparation of the GPU EIR. This resource section was added to the updated CEQA Guidelines that became effective on December 28, 2018, after the GPU EIR was certified. “[A]mendments to the guidelines apply prospectively only” (CEQA Guidelines Section 15007). CEQA documents must meet the “content requirements in effect when the document was set out for public review” and “shall not need to be revised to conform to any new content requirements in guideline amendments taking effect before the document is finally approved” (CEQA Guidelines Section 15007).

The County's wildfire setting has not substantially changed since approval of the General Plan. The northeast portion of the county includes State Responsibility Areas that the California Department of Forestry and Fire Protection has mapped as moderate, high, and very high fire hazard severity zones. This area of the county is designated for General Agriculture in the General Plan and does not support urban development. The projects required for implementation of the CAP measures would generally consist of new or upgraded infrastructure located in the county's developed areas.

Implementation of the CAP would support future infill and infrastructure projects; however, it would not include any habitable structures. EV charging stations and renewable energy facilities would likely be installed in new and existing developments, and roadway improvements would occur along already paved roadways. Further, the CAP would include climate adaptation measures (FIRE-01 to FIRE-06) intended to prepare for increased risks of wildfire associated with climate change, along with several other measures that may provide the co-benefit of reducing wildfire risk (e.g., TEMP-04 to encourage or require the installation or use of green roofs or cool-roof technologies). The CAP would not substantially increase the risk of wildfire in the county in a manner that would expose residents to the uncontrolled spread of wildfire or related pollution. In addition, Policy SA-23 in the General Plan's Safety Element requires that all new development meet the local fire district's standards for adequate water supply and pressure, fire hydrants, and access to structures by firefighting equipment and personnel.

Construction activities associated with the CAP, including new infrastructure improvements, would be required to comply with the California Fire Code's specifications for access and building materials, such as the use of fire-resistant materials. Construction of utilities infrastructure, if needed for development under the CAP, would also be subject to Public Resources Code requirements related to fire safety and wildfire suppression, including PRC Sections 4427, 4428, and 4431. Adherence to applicable PRC requirements would minimize wildfire risks associated with the installation and maintenance of associated infrastructure.

Development required to implement the CAP would be limited and would not increase the exposure of people or structures to significant risks. EV charging stations would likely be installed and renewable energy development would likely occur in new and existing developments, and roadway improvements would occur along already paved roadways. Although the CAP could result in various infrastructure improvements, it would not introduce people to the area, substantially increase the potential for wildfire, or result in substantial changes to drainage and flooding from post-fire instability. Future projects would comply with State and local regulations related to fire safety.

The CAP would not result in any new or substantially more severe impacts or cumulatively considerable impacts related to wildfire than would occur with implementation of the General Plan. This issue will not be discussed further in this SEIR.

1.6 PUBLIC AND ENVIRONMENTAL REVIEW PROCESS

As identified previously in the “Environmental Impact Report Scope and Process” section, in accordance with CEQA regulations, an NOP was distributed on December 14, 2023, to agencies, interested parties, organizations, and individuals that may have interest in the project. A scoping meeting was held on January 10, 2024. The NOP and copies of the comments received in response to the NOP are provided in Appendix A.

The SEIR is being circulated for public review and comment for 45 days from July 15, 2024, to August 28, 2024. During the 45-day public review period, the SEIR is available for review between 8:30 a.m. and 4:30 p.m. Monday through Friday at the County’s Planning and Environmental Review Division office located at:

827 7th Street, Room 225
Sacramento, CA 95814

The SEIR is also available online at the project website:

<https://planning.saccounty.gov/PlansandProjectsIn-Progress/Pages/CAP.aspx>.

Written comments on the SEIR should be mailed to:

Todd Smith, Planning Director
Planning and Environmental Review
827 7th Street, Room 225
Sacramento, CA 95814
(916) 874-6918 (direct)

Written comments may also be submitted to ClimateActionPlan@saccounty.gov.

After the close of the public review and comment period, the County will prepare a final SEIR, which will include written responses to comments on the SEIR and will identify any changes to the SEIR that may be required to address comments or new information, if applicable. Once the Final SEIR is completed, the Sacramento County Board of Supervisors must certify the SEIR and adopt Findings of Fact before it can approve the project. If the SEIR finds that the project would result in any significant and unavoidable impacts, then the Board of Supervisors must also adopt a Statement of Overriding Considerations in accordance with Section 15093 of the CEQA Guidelines.

1.7 ORGANIZATION OF THIS SEIR

The content and format of this SEIR are designed to meet the requirements of CEQA and the CEQA Guidelines (Sections 15122–15132). This SEIR is organized as follows:

- **“Executive Summary.”** This chapter introduces the project; summarizes the environmental review process, effects found not to be significant, and key environmental issues; and lists significant impacts and mitigation measures to reduce significant impacts.

- **Chapter 1, “Introduction.”** This chapter describes the purpose and background of the project, the purpose and intended uses of this SEIR, the CEQA public involvement process, and the scope and organization of this SEIR.
- **Chapter 2, “Project Description.”** This chapter describes the CAP in more detail, including the objectives and location of the project.
- **Chapter 3, “Alternatives.”** This chapter evaluates alternatives to the project, including the No Project Alternative; identifies alternatives considered but eliminated from further consideration; and identifies the environmentally superior alternative.
- **Chapter 4, “Air Quality.”** This chapter evaluates the impacts on air quality expected from implementation of the CAP and assesses whether implementation of the CAP in conjunction with the adopted General Plan could result in air quality impacts that would be new or substantially more severe than disclosed in the GPU EIR.
- **Chapter 5, “Biological Resources.”** This chapter evaluates the impacts on biological resources expected from implementation of the CAP and assesses whether implementation of the CAP in conjunction with the adopted General Plan could result in biological resources impacts that would be new or substantially more severe than disclosed in the GPU EIR.
- **Chapter 6, “Energy.”** This chapter evaluates the energy impacts expected from implementation of the CAP and assesses whether implementation of the CAP in conjunction with the adopted General Plan could result in impacts related to wasteful and inefficient energy consumption that would be new or substantially more severe than disclosed in the GPU EIR.
- **Chapter 7, “Greenhouse Gases and Climate Change.”** This chapter evaluates the impacts related to GHGs and climate change expected from implementation of the CAP and assesses whether implementation of the CAP in conjunction with the adopted General Plan could result in impacts related to GHG emissions and climate change that would be new or substantially more severe than disclosed in the GPU EIR.
- **Chapter 8, “Transportation.”** This chapter evaluates the transportation impacts expected from implementation of the CAP and assesses whether implementation of the CAP in conjunction with the adopted General Plan could result in transportation impacts that would be new or substantially more severe than disclosed in the GPU EIR.
- **Chapter 9, “Summary of Impacts and Their Disposition.”** This chapter summarizes the project’s potential impacts, discusses the significant and irreversible environmental changes related to the project, and evaluates the project’s potential for growth-inducing impacts. This chapter also analyzes the cumulative impacts that would result from implementation of the project, together with other past, present, and probable future projects.
- **Chapter 10, “Bibliography.”** This chapter lists all resources used to prepare the SEIR.

- **Chapter 11, “Acknowledgements.”** This chapter identifies the preparers of the SEIR.

1.8 APPROACH TO ENVIRONMENTAL ANALYSIS

The impact evaluations in this SEIR update the GPU EIR assessments to reflect the anticipated impacts of the CAP. Implementation of the CAP would not increase development potential beyond what was assumed and analyzed in the GPU EIR or result in changes to existing land use and zoning designations. Rather, the CAP includes a program of measures and actions that would be implemented to reduce the forecast GHG emissions in the county and due to county government operations, as well as improve climate change adaptation and resilience. In some cases, the implementation of these measures and actions could be reasonably understood to result in projects with potential environmental effects. This analysis assumes that such projects would be consistent with the General Plan, subject to any appropriate use permits.

The analysis of potential impacts is based on the sample environmental checklist questions provided in Appendix G of the CEQA Guidelines, as modified by adopted County thresholds. The discussion includes the analysis, rationale, and substantial evidence upon which conclusions are drawn. Where necessary to facilitate understanding, the impact discussions are divided to address construction and operation separately, with a summary and impact conclusion provided at the end. The level of significance for each impact is determined by comparing the impacts of physical changes anticipated with implementation of the CAP to the environmental setting, with a focus on how the subsequent projects that may be associated with implementation of the CAP measures and actions could change the significance of the impacts identified in the GPU EIR.

As appropriate, these discussions identify whether adopted General Plan policies and GPU EIR mitigation measures would address the potential impacts. The discussions include a statement regarding whether there would be a new significant effect and/or whether the impact could be more severe than the impact identified in the GPU EIR. Where the applicable GPU EIR mitigation measures required the addition of new or revised policies into the General Plan, this mitigation has been completed and is not applicable to implementation of the CAP. However, consistency with any applicable requirements of the mitigation measure would be established through General Plan policy consistency. The CAP is not a growth-inducing plan and does not propose a change in land uses from those discussed in the GPU EIR. Implementation of the CAP would not increase development potential beyond what was assumed and analyzed in the GPU EIR or result in changes to existing land use and zoning designations. Rather, the CAP includes a program of measures and actions that would be implemented to reduce the forecast GHG emissions in the county and due to county government operations, as well as improve climate change adaptation and resilience. In some cases, the implementation of these actions could be reasonably understood to result in projects with potential environmental effects. This analysis assumes that such projects would be consistent with the General Plan, subject to any appropriate use permits.

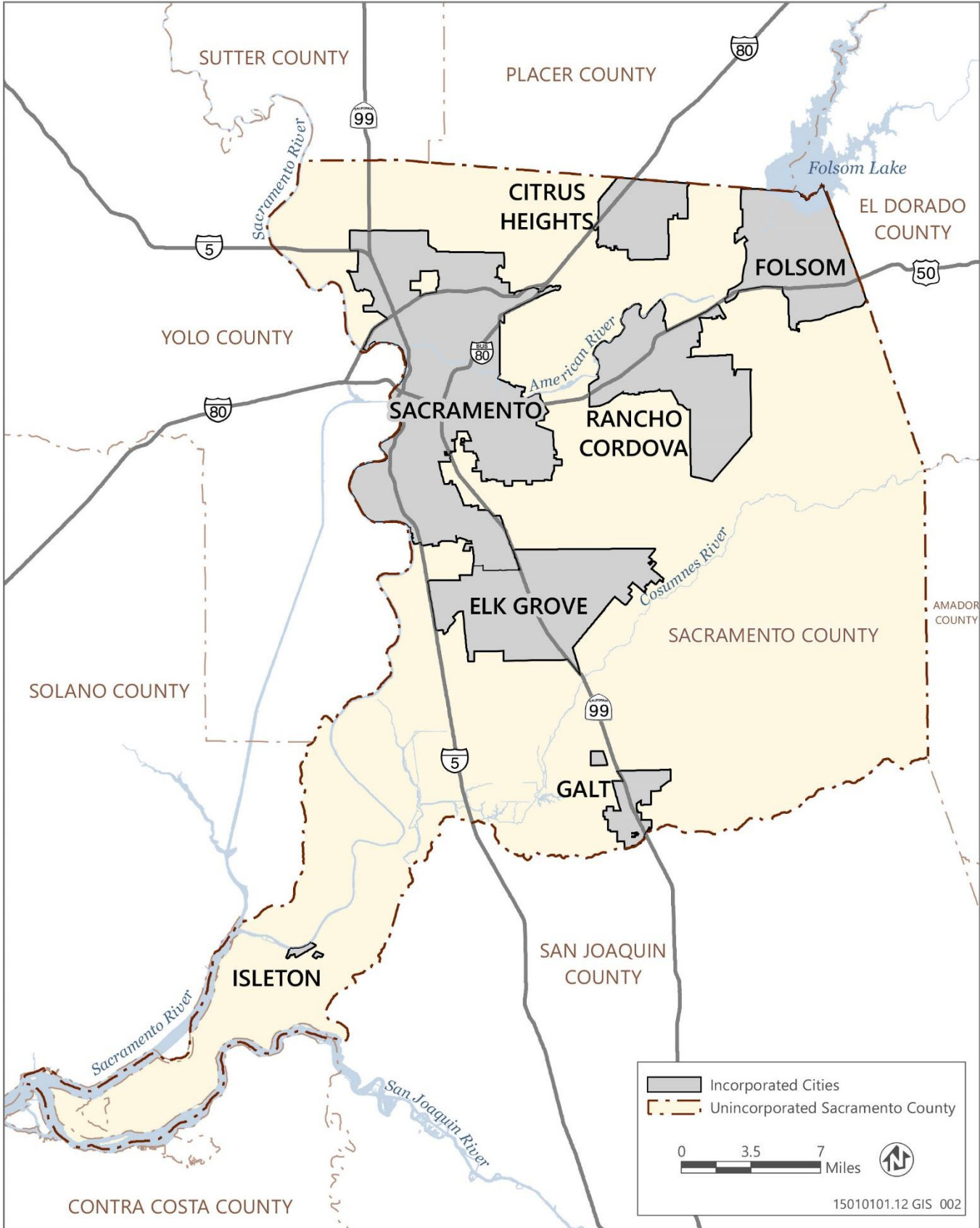
2 PROJECT DESCRIPTION

As described in Chapter 1, “Introduction,” the County has developed a climate action plan (CAP) to fulfill the mitigation commitments established in the *Sacramento County General Plan Update Final Environmental Impact Report* (GPU EIR) (State Clearinghouse Number 2007082086) and subsequently incorporated into the *Sacramento County General Plan of 2005–2030* (General Plan).

2.1 PROJECT LOCATION

Sacramento County lies within the northern portion of California’s Central Valley. The county extends from the delta formed at the confluence of the Sacramento and San Joaquin rivers in the southwest to Folsom Lake and the Sierra Nevada foothills in the northeast (Figure 2-1). It is bordered by eight counties: El Dorado, Amador, San Joaquin, Contra Costa, Solano, Yolo, Sutter, and Placer. Interstates 5 and 80, State Route 99, and U.S. Highway 50 provide regional access.

The CAP and the measures established therein generally apply to lands and land uses in unincorporated Sacramento County, which encompasses approximately 496,083 acres or 775 square miles, and County operations (i.e., County-owned facilities, vehicles, and equipment). The incorporated areas of the county (the cities of Sacramento, Citrus Heights, Folsom, Rancho Cordova, Galt, Elk Grove, and Isleton) would not be subject to the CAP.



Source: Adapted by Ascent Environmental in 2021.

Figure 2-1: Regional Location

2.2 PROJECT OBJECTIVES

The following project objectives have been established by the County to help public agencies and the general public understand the underlying purpose of the proposed project (CEQA Guidelines Section 15124[b]).

1. Implement GPU EIR Mitigation Measure CC-2 to prepare and adopt a CAP that will reduce greenhouse gas (GHG) impacts from implementation of the General Plan.
2. Respond to requests to prepare GHG forecasts that include reasonably foreseeable projects and population growth.
3. Identify GHG emission reduction targets tailored to the unincorporated county and the County's government operations that align with State and County climate goals.
4. Establish GHG emissions reduction measures and actions to achieve the County's GHG emissions reduction targets for communities in the unincorporated county and County operations.
5. Set a framework of sufficiently adaptable long-term strategies that will consider and incorporate, as appropriate, additional GHG reduction strategies that embrace continued innovation, technological advances, and the creation of high-quality jobs in the county.
6. Provide a mechanism for streamlining of project-level GHG emissions analysis consistent with Section 15183.5 of the CEQA Guidelines.
7. Develop climate adaptation strategies to guide the County to a more resilient future.

2.3 CLIMATE ACTION PLAN ELEMENTS

The CAP contains five chapters and Appendices A–G, which provide additional detail on topics covered in the CAP. A brief summary of each component of the CAP is presented below.

- **Chapter 1, “Introduction.”** This chapter serves as the introduction to the CAP and provides important CAP-specific context and other background information.
- **Chapter 2, “Greenhouse Gas Reduction Strategy.”** This chapter presents the GHG emissions inventories, forecasts, and reduction targets, along with a suite of GHG emissions reduction measures for both the community and government operations that are designed to achieve the targets.
- **Chapter 3, “Climate Adaptation and Resilience Strategy.”** This chapter serves as the basis for climate adaptation and resilience, presenting a summary of the climate change vulnerability assessment findings along with a suite of adaptation measures.

- **Chapter 4, “Implementation, Monitoring, and Reporting Strategy.”** This chapter presents the implementation, monitoring, and reporting strategy for the GHG emissions reduction and climate adaptation measures included in Chapters 2 and 3.
- **Chapter 5, “Works Cited.”** This chapter lists all works cited in Chapters 1–4.
- **Appendix A, “Community Engagement Summary.”** This appendix summarizes the outreach and engagement conducted during preparation of the CAP.
- **Appendix B, “Preliminary Draft Climate Action Plan Consistency Review Checklist.”** This appendix presents a sample CAP Consistency Checklist to be used for future projects’ consistency evaluations.
- **Appendix C, “2021 Greenhouse Gas Emissions Inventories.”** This appendix provides the results and calculation methods of the GHG emissions inventories for the year 2021.
- **Appendix D, “Greenhouse Gas Emissions Forecasts and Targets Analysis.”** This appendix presents a detailed approach to setting locally specific GHG emissions reduction targets.
- **Appendix E, “Greenhouse Gas Reduction Measures Analysis.”** This appendix provides a quantified analysis of GHG emissions reduction for each GHG reduction measure.
- **Appendix F, “Greenhouse Gas Reduction Measures County Cost Analysis and Potential Funding Sources.”** This appendix provides a cost assessment and potential funding sources for each GHG emissions reduction measure.

The CAP establishes measures and actions to reduce GHG emissions generated from current and future activities within the County’s unincorporated areas and emissions generated by County facilities and operations. The CAP is structured to align with State laws, policies, regulations, and plans to reduce GHG emissions and improve regional resilience to the impacts of climate change.¹ The CAP includes a GHG emissions inventory to provide all of the following:

- A baseline of major sources of GHG emissions.
- An estimate of existing and future carbon stored in vegetation and soils on natural and working lands.
- A projection of future GHG emissions expected to occur in the unincorporated area and be generated by County operations.
- Targets for reducing GHG emissions to specified levels that are aligned with State laws and policies.

¹ State regulations related to GHG emissions that are applicable to the 2024 CAP and current at the time this document was prepared are Senate Bill 32, Assembly Bill 1279, and the State’s 2022 Climate Change Scoping Plan.

- Measures and implementing actions to reduce GHG emissions to meet the targets.

In summary, the CAP identifies the following:

- Baseline GHG emissions and forecasts of potential increases in these emissions over time, both for the unincorporated county (community) and for County operations.
- GHG emissions reduction targets for 2030 and 2045.
- Measures and actions to achieve the 2030 and 2045 GHG emissions reduction targets.

Each key component of the CAP is discussed below.

2.3.1 GREENHOUSE GAS EMISSIONS INVENTORY

The GHG emissions inventory identifies and measures the major sources of GHG emissions from activities occurring within the unincorporated area and from County operations.

The County conducted a GHG emissions inventory for community-wide and government operations for calendar year 2021. The 2021 GHG emissions inventory also serves to assist the public and decision-makers in understanding the relative emissions contributions of the various community-wide and government operations sectors, and to identify which of these may represent the best opportunities for future GHG emissions reduction.

The inventory of GHG emissions used in the CAP is based on a 2021 GHG emissions inventory that was prepared by the County's sustainability manager and first released in June 2023. These data establish a baseline of emissions by sector, or type of emissions-generating activity. Sectors in the community-wide inventory are on-road and off-road vehicles, building energy, high-global-warming-potential gases, agriculture, solid waste, and water and wastewater. Sectors in the government operations inventory are employee commute, buildings and facilities, airport building and facilities, vehicle fleet, water and wastewater, and streetlights and traffic signals. The results of the 2021 GHG emissions inventory for community and government operations are summarized in Table 2-1 and Table 2-2, respectively. The calculation methods for the GHG emissions inventory are discussed further in Appendix C of the CAP.

Table 2-1: Sacramento County Community Greenhouse Gas Emissions Inventory

Sectors	2021 (MTCO₂e/year)	Percentage of Total (%)
On-Road Vehicles	1,844,200	44.3
Off-Road Vehicles	107,200	2.6
Residential Building Energy	878,300	21.1

Sectors	2021 (MTCO ₂ e/year)	Percentage of Total (%)
Commercial/Industrial Building Energy	555,600	13.4
High-Global-Warming-Potential Gases	317,800	7.6
Agriculture	266,500	6.4
Solid Waste	156,700	3.8
Water and Wastewater	33,300	0.8
Total	4,159,600	100.0

NOTE: MTCO₂e = metric tons of carbon dioxide equivalent.

Source: Sacramento County 2024.

Table 2-2: Sacramento Government Operations Greenhouse Gas Emissions Inventory

Sectors	2021 (MTCO ₂ e/year)	Percentage of Total (%)
Employee Commute	30,400	36.4
Buildings and Facilities	23,800	28.5
Airport Buildings and Facilities	6,700	8.0
Vehicle Fleet	15,600	18.6
Water and Wastewater	5,800	6.9
Streetlights and Traffic Signals	1,300	1.5
Total	83,500	100

NOTE: MTCO₂e = metric tons of carbon dioxide equivalent.

Source: Sacramento County 2024.

2.3.2 GREENHOUSE GAS EMISSIONS FORECASTS

GHG emissions forecasts relative to current conditions were prepared for both the near term (2030) and the long term (2045), under two scenarios: the *business-as-usual scenario* (BAU) forecast and the *legislative adjusted business-as-usual scenario* (ABAU) forecast.

In the first scenario, the BAU forecast, GHG emissions are forecasted to grow from 2021 levels at the same rates as housing, population, and employment as predicted in the General Plan, along with reasonably foreseeable growth associated with recently approved and pending development applications (see CAP Appendix D, *GHG Forecasts and Targets Analysis*, for details). The BAU forecast serves as a basis for understanding how emissions levels may change from baseline emissions levels based on potential growth trends, without accounting for actions taken by federal, State, or local agencies.

The second scenario, the ABAU forecast, considers the local GHG emissions reduction impact of federal and State legislation. The ABAU forecast scenario provides a more realistic assessment of future GHG emissions by showing how currently adopted federal and State legislation, regulations, and other foreseeable actions outside the County's jurisdictional control will reduce emissions (see Appendix D to the CAP). The ABAU forecast scenario does not account for proposed measures in the CAP, but it provides an important benchmark for how much further GHG emissions will need to be reduced in future years to achieve local targets. The BAU and ABAU forecasts for community and government operations are summarized in Table 2-3 and Table 2-4, respectively. The calculation methods for the GHG forecasts are discussed further in Appendix D of the CAP.

Table 2-3: Sacramento County Community Business-as-Usual and Adjusted Business-as-Usual Greenhouse Gas Emissions by Sector

Sector	BAU		ABAU	
	2030	2045	2030	2045
On-Road Vehicles	2,140,000	2,633,800	1,558,000	443,500
Off-Road vehicles	126,800	160,000	126,800	160,000
Residential Building Energy	1,005,400	1,217,300	871,600	499,700
Commercial/Industrial Building Energy	668,300	856,200	546,500	217,500
High-GWP Gases	363,800	440,500	253,500	161,300
Agriculture	263,100	259,100	263,100	259,100
Solid Waste	179,400	217,200	179,400	217,200
Water/Wastewater	38,100	46,100	30,100	4,300
Total	4,784,900	5,830,200	3,829,100	1,962,500
Percent Change from 2021 Levels	+15%	+40%	-8%	-53%

Source: Sacramento County 2024.

Table 2-4: Sacramento County Government Operations Business-as-Usual and Adjusted Business-as-Usual Greenhouse Gas Emissions by Sector

Sector	BAU		ABAU	
	2030	2045	2030	2045
Employee Commute	34,100	41,900	23,600	5,600
Buildings & Facilities Energy	34,200	42,100	28,400	11,000
Airport Buildings & Facilities	9,600	11,800	8,000	3,300
Vehicle Fleet	17,400	21,500	17,400	21,500

Sector	BAU		ABAU	
	2030	2045	2030	2045
Water & Wastewater	8,900	11,000	6,900	300
Streetlights & Traffic Signals	2,000	2,400	1,500	0
Total	106,100	130,600	85,800	41,700
Percent Change from 2021 Levels	+30%	+60%	+5%	-49%

Source: Sacramento County 2024.

The growth assumptions used in the GHG emissions forecasts were based on projected growth in housing units and employees under the County's current General Plan, along with reasonably foreseeable growth associated with recently approved and pending development applications. By including pending applications in the population forecasts, the County has not presupposed their approval or implied that projects that are inconsistent with the CAP could streamline subsequent GHG analyses if the CAP is approved. Capturing the full magnitude of potential growth does, however, typically result in greater GHG emissions in the ABAU scenario.

2.3.3 GREENHOUSE GAS EMISSIONS REDUCTION TARGETS

Emissions reduction targets that align with State targets are set in the CAP, as explained in detail in CAP Appendix D. The GHG emissions reduction targets for the CAP are based on the years 2030 and 2045 to align with the target years specified in the applicable State legislation (i.e., Assembly Bill [AB] 1279), and are consistent with the State's latest Climate Change Scoping Plan (2022 Scoping Plan). SB 32 requires the State to develop and implement a strategy for achieving a statewide GHG emissions reduction target 40 percent below 1990 levels by 2030. AB 1279 requires the State to develop and implement a strategy for achieving a statewide GHG emissions reduction target of 85 percent below 1990 levels for anthropogenic emissions,² as well as net zero GHG emissions by 2045 or sooner and net negative emissions thereafter. The 2022 Scoping Plan also identified an accelerated target to reduce GHG emissions to 48 percent below 1990 levels by 2030 to ensure that statewide GHG emissions reduction efforts will keep the State on track to achieve its 2045 targets.

The State's 2030 and 2045 GHG emission reduction targets are as follows:

- 40 percent below 1990 levels by 2030 (target per SB 32).
- 48 percent below 1990 levels by 2030 (goal per the 2022 Scoping Plan).
- 85 percent below 1990 levels by 2045 (target per AB 1279).

² "Anthropogenic emissions" are GHG emissions caused by human activities. These activities include the burning of fossil fuels, deforestation, land use and land use changes, livestock production, fertilization, waste management, and industrial processes.

Because 1990 emissions data are not available for the unincorporated county, the CAP's targets were developed relative to the 2021 baseline year of the County's most recent GHG emissions inventory. To develop unincorporated Sacramento County-specific reduction targets for the CAP that align with statewide targets, the 2022 Scoping Plan was reviewed to identify the emissions sectors in this statewide plan that are relevant and applicable to the County (based on what emissions sectors were included in the County's GHG emissions inventory). The emissions reduction trajectory of each applicable sector in the 2022 Scoping Plan was then applied to the County's emissions levels to calculate GHG emission reduction levels and target percentages for the CAP relative to the 2021 baseline year. The CAP's GHG emission reduction targets are as follows:

- 39 percent below 2021 levels by 2030.
- 83 percent below 2021 levels by 2045.

The CAP's 2030 target of 39 percent below 2021 levels exceeds the statewide 2030 target as codified in SB 32 and both the 2017 Scoping Plan (which establishes a pathway to achieve SB 32) and the 2022 Scoping Plan (which sets targets beyond SB 32). This is because the County's 2030 target of 39 percent below 2021 levels is equivalent to a 48 percent reduction below 1990 levels, which exceeds the State of California's target of 40 percent below 1990 levels. Consequently, the CAP is more stringent than the state target both when comparing to 1990 levels and when comparing to per-capita emissions levels. The CAP's 2030 target also sets the County on a trend to achieve California's 2045 GHG emissions reduction targets.

The CAP's 2030 target is derived using the 2022 Scoping Plan's recommendations for local land use development to contribute their "fair share" of emissions reductions to the statewide GHG target for 2030. This is also consistent with the Association of Environmental Professionals' recommendation in its 2016 white paper to use "Substantial Progress" thresholds for land use development to show consistency with statewide targets (AEP 2016). Consequently, pursuant to CEQA Guidelines Section 15064.4(b)(3), the 2030 target represents the level below which GHG emissions would not be cumulatively considerable through the year 2030.

The CAP's 2045 target of 83 percent below 2021 levels aligns with the statewide 2045 target, as codified in AB 1279 and the 2022 Scoping Plan. This is because the County's 2045 target of 83 percent below 2015 levels is equivalent to an 85 percent reduction below the County's 1990 levels, which aligns with the State of California's target of 85 percent below 1990 levels. Consequently, the CAP's target is equivalent to the State target. The CAP's 2045 target also sets the County on a trend to achieve California's 2045 carbon neutrality target. Consequently, pursuant to CEQA Guidelines Section 15064.4(b)(3), the CAP's 2045 target represents the level below which GHG emissions would not be cumulatively considerable through the year 2045.

Finally, the CAP's aspirational goal of carbon neutrality by 2045 aligns with the statewide 2045 target of carbon neutrality stipulated in AB 1279.

2.3.4 GREENHOUSE GAS EMISSIONS REDUCTION MEASURES AND CLIMATE ADAPTATION MEASURES

The CAP includes measures and actions intended to reduce the total net amount of GHG emissions occurring within the unincorporated county and from County operations and to reduce the county's exposure and sensitivity to climate effects. These measures are described further below and listed in Table 2-8 and Table 2-9, both at the end of this chapter. To be effective and meet targets, measures and actions must be within the County's jurisdiction to carry out and must supplement existing regulations from the federal or State government, be achievable, and be capable of being monitored for progress over time.

Measures include implementing actions that result in quantifiable reductions of GHG emissions that provide other co-benefits such as improved community health or air quality, new renewable energy and manufacturing jobs, and increased access to clean transportation.

COMMUNITY GREENHOUSE GAS EMISSIONS REDUCTION MEASURES

The CAP identifies 16 community-wide measures in nine general categories. Table 2-5 summarizes the anticipated GHG reductions from each community-wide measure in the target years of 2030 and 2045. Reductions are reported as annual totals and account only for emissions achieved above the ABAU forecast. In some cases, the 2045 emissions reductions attributable to the CAP would be lower in 2045 because more reductions would be required through other legislation by that time. For a full description of the GHG emissions reduction strategy, see Chapter 2 and Appendix E of the CAP. The following discussion summarizes the types of activities that would occur in the unincorporated county with implementation of the measures and actions proposed in the CAP.

Table 2-5: Summary of Greenhouse Gas Emissions Reduction Potential from Community-wide Climate Action Plan Measures

GHG Emissions Reduction Measures	Anticipated Annual GHG Reduction (MTCO ₂ e)	
	2030	2045
GHG-01: Develop a Carbon Farming Program	99,300	451,500
GHG-02: Expand the Urban Forest	800	3,200
GHG-03: Support the SMUD Zero Carbon Plan ¹	436,200 (residential building energy) 373,200 (nonresidential building energy)	0 (residential and nonresidential building energy) ²
GHG-04: Accelerate Existing Building Energy Efficiency Retrofits and Decarbonization	10,400 (residential building energy) 29,600 (nonresidential building energy)	69,200 (residential building energy) 134,800 (nonresidential building energy)

GHG Emissions Reduction Measures	Anticipated Annual GHG Reduction (MTCO ₂ e)	
	2030	2045
GHG-05: Decarbonize New Buildings ²	1,700 (residential building energy) 2,800 (nonresidential building energy)	6,800 (residential building energy) 50,100 (nonresidential building energy)
GHG-06: Retire Fossil-Fuel-Powered Landscaping Equipment	3,100	17,300
GHG-07: Increase EV Charging and ZEV Infrastructure ³	290,800	220,400
GHG-08: Develop a VMT Impact Fee Program	Not Quantifiable	Not Quantifiable
GHG-09: Reduce VMT from New Developments ³	14,100	15,900
GHG-10: Revise Parking Standards ³	300	<100
GHG-11: Increase Transit Ridership ³	300	100
GHG-12: Implement the Active Transportation Plan ³	2,600	2,900
GHG-13: Accelerate Infill Development	Not Quantifiable	Not Quantifiable
GHG-14: Increase Organic Waste Diversion and Landfill Gas Capture	149,000	202,100
GHG-15: Implement the South Sacramento Habitat Conservation Plan	Not Quantifiable	Not Quantifiable
GHG-16: Expand the Use of Zero-Emission Construction and Agricultural Equipment	13,700	68,900
Total⁴	1,427,900	1,243,200
Required Reductions to Meet Target	1,303,700	1,237,700
Emissions Above (+) or Below (-) Target	-124,300	-5,500
Target Met?	Yes	Yes

Notes: EV = electric vehicle; GHG = greenhouse gas; MTCO₂e = metric tons of carbon dioxide equivalent; N/A = not applicable; SMUD = Sacramento Municipal Utility District; VMT = vehicle miles traveled.

1. GHG emissions reductions are additional beyond those of Senate Bill (SB) 100 and SB 1020, as accounted for in the adjusted business-as-usual (ABAU) forecast.
2. GHG emissions reductions are additional beyond those of the 2022 California Building Standards Code, Title 24, as accounted for in the ABAU forecast.
3. GHG emissions reductions are additional beyond those of the Advanced Clean Cars II and Advanced Clean Fleets regulations, as accounted for in the ABAU forecast.
4. Totals may not be sum exactly due to independent rounding.

Source: Sacramento County 2024: Table 2.11.

The community GHG reduction measures can be grouped into eight policy focus areas, which are summarized below.

INCREASE CARBON SEQUESTRATION IN THE URBAN FOREST AND NATURAL AND WORKING LANDS

Increasing the carbon sequestration potential in the county is critical for alignment with statewide GHG reduction targets and can provide various co-benefits such as healthier natural lands and improved climate resilience. Measures GHG-01, GHG-02, and GHG-15 increase carbon sequestration in the urban forest and natural and working lands of the county. Measure GHG-01 creates a program to increase carbon farming in the county to improve carbon sequestration in working lands and maintain healthy soils that are valuable to the region. Measure GHG-02 involves planting 15,000 net new trees by 2030 and 62,000 net new trees by 2045. Measure GHG-15 continues the county's commitment to conserving and enhancing its natural lands through the implementation of the South Sacramento Habitat Conservation Plan (SSHCP).

DECARBONIZE THE ENERGY SUPPLY

Sacramento Municipal Utility District (SMUD) aims to supply 100 percent of its electricity from carbon-free sources by 2030, and is on track to meet this goal (SMUD 2023). Measure GHG-03 commits the County to work with SMUD to support the implementation of the 2030 Zero Carbon Plan through the installation of solar photovoltaic and battery storage at County facilities, amendments to the zoning code, and ensuring implementation of all CAP measures are aligned with SMUD's goals.

IMPROVE ENERGY EFFICIENCY AND DECARBONIZE BUILDINGS

Improving energy efficiency and reducing fossil fuel use in new and existing buildings are key to avoiding future GHG emissions and reducing energy bill burdens. Improving the energy efficiency of current building stock reduces reliance on fossil fuel-based energy sources while lowering energy bills. However, designing new buildings with decarbonization in mind allows for a transition towards GHG-free energy sources over a building's lifetime, without the need for future retrofits. Measures GHG-04 and GHG-05 aim to reduce GHG emissions associated with building energy using energy efficiency and decarbonization strategies. Measure GHG-04 develops and implements building codes and performance standards for existing buildings in the county to reduce reliance on fossil fuels and achieve emissions reduction. Measure GHG-05 requires all new construction projects to achieve specific performance standards to increase energy efficiency and decarbonization. These measures will be supported by the County through incentives, targeted outreach, and workforce development and training opportunities.

DECARBONIZE EQUIPMENT

The use of fossil fuels in landscaping, construction, and agricultural equipment generates GHG emissions that are hard to abate, as local governments have limited control over these equipment types. Measure GHG-06 and GHG-16 encourage and support the community to phase fossil-fueled non-road equipment to electric and zero-emission equipment, reducing their generation of GHG emissions. Measure GHG-06 facilitates the trade-in of landscaping equipment powered by fossil fuels for electric equipment, aiming to retire approximately 78,000 pieces of equipment by 2030 and 310,000 by 2045. Measure GHG-16 encourages the adoption of zero-emission construction and agricultural equipment through incentives and outreach efforts and requires specific equipment types to be electric or zero-emission after 2035.

INSTITUTIONALIZE LOW-CARBON TRANSPORTATION

Transportation is the largest source of GHG emissions in the County. Adoption of low-carbon transportation options like plug-in hybrid or electric vehicles (EVs) by the community is the most impactful way of reducing transportation-related GHG emissions. Measure GHG-07 institutionalizes low-carbon transportation by establishing robust EV charging infrastructure and frameworks to support the widespread adoption of hybrid and electric vehicles. Implementing the measure would increase EV network capacity in the county by installing 24,000 EV chargers by 2030 and 72,000 EV chargers by 2045, through both direct installation by the County and requirements for new development and retrofit projects.

REDUCE VEHICLE MILES TRAVELED AND VEHICLE TRIPS

In addition to adopting low-carbon transportation options, reducing the number of vehicle trips is another effective approach for eliminating emissions associated with transportation. This can be achieved by supporting offsite VMT mitigation for development projects and improving access to public and active transit options. Measures GHG-08, GHG-09, GHG-11, and GHG-12 implement these strategies to reduce vehicle miles traveled (VMT) associated with single occupancy vehicles and thus reduce transportation-related GHG emissions. Measure GHG-08 develops a VMT impact fee program requiring developers to contribute to regional VMT reductions when project-specific VMT cannot be mitigated to below the significance threshold. Measure GHG-09 updates the requirements of the transportation system management plans to include a target of a 15 percent reduction in annual VMT compared to the regional average from all new developments through 2045. Measure GHG-11 increases the accessibility, comfort, and convenience of active travel modes can help reduce single-occupancy trips. It enhances partnerships with regional transportation agencies to increase transit ridership by 16 percent by 2030 and 43 percent by 2045, both compared with 2021 levels, by implementing the "Transit" policy plan in the General Plan's Circulation Element. Measure GHG-12 would improve active transportation infrastructure by implementing priority projects identified in the 2022 Active Transportation Plan (ATP), which include 66 pedestrian spot improvements, 51 miles of sidewalk gap closures, and bicycle projects representing 190 miles by 2030, and all recommended projects identified in the ATP by 2045.

INCREASE INFILL DEVELOPMENT

Increasing infill development can facilitate shorter trips, preserve natural areas, and lead to better resource utilization. One approach to increase infill development through CAP is imposing extra fees on projects that do not meet infill development standards. Measure GHG-13 proposes the implementation of an infill development program and the establishment of an Infill Fee structure to advance infill development in priority areas through 2030 and 2045. Priority areas include critical locations like transit centers, job centers, and urban centers. By concentrating development in these strategic locations, people have greater access to essential services and job opportunities, reducing the need for long commutes and promoting more sustainable travel patterns. Measure GHG-10 focuses on influencing parking policies and behaviors to further support infill development. It would revise parking standards for new developments to lower minimum parking requirements, potentially fostering more infill development and reducing housing costs in transit-priority areas. By increasing development in these key areas, the number of trips and trip distances can be minimized, thereby reducing greenhouse gas emissions associated with vehicle travel.

MINIMIZE WASTE AND RECOVER ENERGY AND MATERIALS FROM THE WASTE STREAM

Landfilled organic waste is responsible for generating methane emissions in the waste sector. Reduction in waste generated and increased composting can reduce GHG emissions in this sector. Measure GHG-14 would increase the diversion of organic waste deposited into landfills to 75 percent by 2030 and 90 percent by 2045. This measure supports the implementation of statewide organic waste reduction targets set by CARB through SB 1383.

GREENHOUSE GAS EMISSIONS REDUCTION MEASURES FOR COUNTY GOVERNMENT OPERATIONS

The CAP identifies six government operations measures in five general categories. Table 2-6 summarizes the anticipated GHG emissions reductions from each measure. As described previously, reductions are reported as annual totals and account only for emissions achieved above the ABAU forecast. In some cases, the 2045 emissions reductions from the CAP would be lower in 2045 because more reductions would be required through other legislation by that time. For a full description of the GHG emissions reduction strategy, see Chapter 2 and Appendix E of the CAP. The following discussion summarizes the types of activities that would occur in the County's government operations with implementation of the measures and actions proposed in the CAP.

Table 2-6: Summary of Greenhouse Gas Emissions Reduction Potential from Government Operations Measures in the Climate Action Plan

GHG Emissions Reduction Measures	Anticipated GHG Reduction (MTCO ₂ e)	
	2030	2045
GOV-01: Reduce Employee Commute VMT ¹	900	200
GOV-02: Develop a Non-Airport Fleet Conversion Program	5,100	18,000
GOV-03: Develop an Airport Fleet Conversion Program	1,000	3,400
GHG-03: Support SMUD Zero Carbon Plan ²	24,700	0
GOV-04: Reduce Natural Gas Usage in County Buildings	4,600	12,800
GOV-05: Improve Water Efficiency ³	0	0
GOV-06: Replace Outdoor Lights with LEDs ³	0	0
Total⁴	36,400	34,500
Required Reductions to Meet Target	36,100	27,400
Emissions Above (+) or Below (-) Target	-300	-7,100
Target Met?	Yes	Yes

Notes: County = Sacramento County; GHG = greenhouse gas; LED = light-emitting diode; MTCO₂e = metric tons of carbon dioxide equivalent; SMUD = Sacramento Municipal Utility District; VMT = vehicle miles traveled.

1. GHG emissions reductions are additional beyond those of the Advanced Clean Cars II and Advanced Clean Fleets regulations, as accounted for in the adjusted business-as-usual (ABAU) forecast.
2. GHG emissions reductions are additional beyond those of Senate Bill (SB) 100 and SB 1020, as accounted for in the ABAU forecast.
3. GHG emissions reductions are additional beyond those of SB 100 and SB 1020, as accounted for in the ABAU forecast, as well as Measure GHG-03.
4. Totals may not sum exactly due to independent rounding.

Source: Sacramento County 2024: Table 2.12.

The government operations GHG reduction measures can be grouped into five policy focus areas, which are summarized below.

REDUCE COUNTY EMPLOYEES' SINGLE-OCCUPANCY VEHICLE TRIPS

Single-occupancy vehicle trips are a significant contributor to transportation related emissions. Measure GOV-1 aims to decrease County employees' single-occupancy vehicle trips by further expanding the County's Employee Transportation Program to continue encouraging employees to use EVs, vanpools, and other active transportation modes. The expansion of the program would target to reduce employee commute VMT to four percent below the 2021 per employee average by launching new programs and incentives.

DECARBONIZE COUNTY TRANSPORTATION INFRASTRUCTURE

Transitioning the County's vehicles and equipment to zero-emission alternatives is a critical step in the process of decarbonization County's transportation infrastructure. Measures GOV-2 and GOV-3 would expand the County's Fleet Conversion Program to convert 35 percent of the County's on-road and off-road vehicle fleet to zero-emission technology by 2030 and 100 percent by 2045.

DECARBONIZE BUILDINGS

The County commits to reducing reliance of County owned buildings and facilities on fossil fuel-based energy sources. Measure GOV-4 commits the County to reducing natural gas use in County buildings and facilities by 85 percent below 2021 levels by 2045 by developing and implementing a County Buildings and Facilities Decarbonization Plan. The County will also adopt a policy that requires all newly constructed County buildings to include no natural gas infrastructure, as feasible. Measure GHG-03 would identify opportunities to install renewable energy resources and battery storage at County-owned buildings and properties.

INCREASE WATER EFFICIENCY

Reducing water consumption reduces emissions associated with water pumping, distribution, treatment, and storage. Measure GOV-5 improves water efficiency at County buildings, facilities, and landscaped areas to reduce water consumption by 11 percent in 2030 and 29 percent in 2045 below 2021 levels.

INCREASE ENERGY EFFICIENT LIGHTING SYSTEM

To improve energy efficiency, the County is already in the process of replacing high-pressure sodium County-managed lights with light-emitting diodes (LEDs). Measure GOV-6 commits the County to replacing all 2,200 remaining County-managed streetlights with LEDs by 2030 and all remaining County-managed outdoor lighting with LEDs by 2045.

REDUCE COUNTY EMPLOYEES' SINGLE-OCCUPANCY VEHICLE TRIPS

Measure GOV-1 would expand the County's Employee Transportation Program to reduce employee commute VMT to four percent below the ABAU forecast. The County would continue encouraging employees to use EVs, vanpools, and other active

transportation modes by launching new programs, introducing incentives, and organizing promotional events to raise awareness of the benefits that may result from fewer transportation emissions.

DECARBONIZE COUNTY TRANSPORTATION INFRASTRUCTURE

Measure GOV-2 would expand the County's Fleet Conversion Program to convert 30 percent of the County's on-road and off-road vehicle fleet to zero-emission technology by 2030 and 100 percent by 2045. **Measure GOV-3** would develop and adopt an Airport Fleet Conversion Program to convert 35 percent of the Sacramento County Airport System's fleets to zero-emission technology by 2030 and 100 percent by 2045.

DECARBONIZE BUILDINGS

Measure GOV-4 would develop a County buildings and facilities decarbonization plan by 2026 and reduce natural gas use in County buildings by 85 percent below 2021 levels by 2045. **Measure GHG-03** would identify opportunities to install renewable energy resources and battery storage at County-owned buildings and properties.

INCREASE WATER EFFICIENCY

Measure GOV-5 would improve water efficiency at County buildings, facilities, and landscaped areas to reduce water consumption by 11 percent in 2030 and 29 percent in 2045 below 2021 levels.

INCREASE ENERGY EFFICIENT LIGHTING SYSTEM

Measure GOV-6 would replace all 2,200 remaining high-pressure sodium County-managed streetlights with light-emitting diodes (LEDs) by 2030 and all remaining County-managed outdoor lighting with LEDs by 2045.

CLIMATE ADAPTATION MEASURES

The CAP identifies a total of 43 climate adaptation measures to reduce the County's exposure and sensitivity to climate effects and increase adaptive capacity. These measures and associated implementing actions are summarized below and described in detail in Table 2-6.

- **Measures TEMP-01 through TEMP-10** include actions to upgrade infrastructure, partner with local agencies and utilities, and provide education programs to reduce the risks associated with increased temperatures and extreme-heat days and heat waves.
- **Measures FIRE-01 through FIRE-06** include actions to identify locations with high fire hazards, implement ecological restoration strategies in existing and potential future burned areas, improve emergency preparedness, and collaborate with agencies and organizations to reduce wildfire hazards.
- **Measures WATER-01 through WATER-06** include actions to evaluate the vulnerability of local water supply systems and develop strategies to improve resilience; develop programs to increase the usage of on-site greywater, rainwater, and stormwater; develop programs to assist farmers with new drought-adaptive production methods; and develop water conservation education programs to reduce the risks associated with increased drought events.

- **Measures FLOOD-01 through FLOOD-14** contain actions to increase the County's capacity to adapt to increased flooding events, such as increasing investment in green infrastructure, improving emergency evacuation, and developing strategies to provide naturalized flood channels.
- **Measures SLR-01 through SLR-05** contain actions to increase the County's capacity to adapt to sea-level rise, including incorporating sea-level rise into the County's Local Hazard Mitigation Plan and capital improvement plans, supporting ongoing studies on sea-level rise, and coordinating with other agencies to protect vulnerable populations and infrastructure.
- **Measures ALL-01 and ALL-02** include actions to address all threats associated with climate change, including developing multilingual outreach materials accessible across multiple forms of media and establishing monitoring programs to assess implementation of the climate adaptation measures identified in the CAP.

2.3.5 EVALUATION OF PROJECT ELEMENTS

The CAP is a policy document that does not propose any specific development or any other specific physical change to the environment. No growth would result from implementation of the CAP; it does not influence the rate of growth anticipated in the General Plan (including the Housing Element). No changes to General Plan land use designations, zoning, or land use-specific projects are proposed as part of the CAP. The CAP does not include measures or actions that would result in changes to the County's Urban Policy Area boundary or result in the construction of new transportation corridors. Future developments would be subject to project-level environmental review.

The proposed CAP measures and implementing actions represent the component of the project that could result in physical impacts on the environment. For this reason, the measures and actions are the focus of evaluation in this SEIR. As summarized previously, the measures and actions proposed in the CAP encompass a range of potential tactics, from proposed ordinances, plans, and support of legislation to specific programs designed to reduce GHG emissions in the unincorporated county and from County operations.

The analysis that follows assumes that all CAP measures and actions would be implemented and focuses on the measures and actions with potential to result in physical environmental impacts. See Tables 2-5 and 2-6 for details. The potential environmental effects of all measures are considered in this SEIR, whether the CAP quantifies reductions from the measures or the measures support GHG emissions reductions in an unquantifiable way. Further, this SEIR does not speculate about the site-specific physical impacts that could occur if and when a specific site improvement is proposed in the future at a site location still to be determined. Rather, this SEIR considers the types of impacts that could occur with implementation of the proposed GHG emissions reduction measures and actions. The analysis of impacts that would result from implementation of the CAP is conducted at a program level, and specific projects that would occur to support CAP implementation may require subsequent CEQA review.

2.4 RESPONSIBILITIES FOR CLIMATE ACTION PLAN IMPLEMENTATION

Regular monitoring to track and annual report progress toward achieving GHG emissions reductions targets is an integral component of the CAP. The CAP is intended to be a living document and would continuously evolve and be refined as new legislation is adopted, science and technology advance, and progress toward GHG emissions reduction targets is evaluated. Implementation will require long-term commitment and ongoing collaboration with private and public-sector partners and the community.

After adoption, the County's Planning and Environmental Review Division will maintain the CAP. This department will coordinate with other County departments to facilitate and oversee implementation, including tracking and reporting on the progress of each measure. Staff members will track progress relative to the expected quantified outcomes of each GHG reduction measure and action, using the Implementation and Monitoring Program described and summarized in Chapter 4 of the CAP. All measures and actions that would contribute to the achievement of the County's reduction targets and goals are identified. Measurable outcomes, implementation timelines, County department leads, enforcement mechanisms, estimated GHG reduction potential, relative costs, and potential funding sources are summarized in Table 2-8 and Table 2-9 below. The County's Climate Emergency Mobilization Task Force will also support CAP implementation and monitoring.

The County will conduct annual monitoring beginning one year after approval of the CAP to track progress and identify where further efforts and additional resources may be needed. Annual monitoring reports will include the status of measure implementation using monitoring metrics to show progress in meeting the reduction targets.

2.4.1 FUTURE CEQA STREAMLINING OF GREENHOUSE GAS ANALYSES

Under CEQA, projects that require discretionary approval must disclose whether they would generate GHG emissions that would have a significant impact on the environment or whether they would conflict with a plan or regulation adopted to reduce emissions. Section 15183.5 of the CEQA Guidelines establishes a mechanism for agencies to prepare a plan for reducing GHG emissions that analyzes and mitigates the effects of GHG emissions at a programmatic level. Pursuant to CEQA Guidelines Section 15183.5(b)(2), if adopted after certification of this SEIR, the CAP may then be used in the cumulative impacts analysis of later projects. Such "later activities" could include actions to implement CAP measures and actions, future discretionary projects, and actions to implement buildout of the General Plan through the planning horizon (e.g., wireless facilities, roadway improvements, County parks and libraries, and housing and commercial projects consistent with the General Plan).

To use the tiering and streamlining provisions of CEQA Guidelines Section 15183.5, agencies must prepare a plan that meets the requirements in Section 15183.5(b).

As summarized in Table 2-7 and detailed in Chapter 4 of the CAP, the CAP has been prepared in accordance with the plan elements described in CEQA Guidelines Section

15183.5(b)(1). This SEIR provides the appropriate level of environmental review to allow future projects to tier from and streamline their analysis of GHG emissions pursuant to CEQA Guidelines Sections 15183.5(a) and 15183.5(b)(2). A future environmental document may rely on a project’s consistency with the CAP to reduce GHG emissions and result in a less-than-significant impact related to GHG emissions. Such an environmental document would be required to identify those requirements specified in the CAP that apply to the project, and, if those requirements are not otherwise binding and enforceable, incorporate those requirements as mitigation measures applicable to the project.

Table 2-7: CAP Compliance with Elements of a CEQA Qualified Plan for the Reduction of GHG Emissions

Elements of a Plan for the Reduction of Greenhouse Gas Emissions [CEQA Guidelines 15183.5(b)(1)]	Climate Action Plan Compliance with Elements
(A) Quantify greenhouse gas (GHG) emissions, both existing and projected, over a specified period of time, resulting from activities within a defined geographic area.	The Climate Action Plan (CAP) is based on the County’s 2021 inventory of existing GHG emissions, and forecasts for 2030 and 2045, for both the unincorporated area and County operations. GHG emissions for all years include emissions associated with all activities occurring within the boundaries of the unincorporated areas. The inventories and forecasts were prepared pursuant to the U.S. Community Protocol for Accounting and Reporting of Greenhouse Gas Emissions (Community Protocol) version 1.2 (July 2019) developed by Local Governments for Sustainability (ICLEI) and the ICLEI Local Government Operations Protocol (LGO Protocol), version 1.1 (May 2010) developed by ICLEI. Further, the inventories and forecasts include sources over which the County has some level of jurisdictional control or influence (such as building energy use) and exclude those sources over which the County has no jurisdictional control or influence (such as military vehicles and power plants).
(B) Establish a level, based on substantial evidence, below which the contribution to GHG emissions from activities covered by the plan would not be cumulatively considerable.	The CAP establishes 2030 and 2045 targets for the reduction of GHG emissions in alignment with legislative targets for statewide emissions reductions and the state’s 2022 Scoping Plan for Achieving Carbon Neutrality. The CAP identifies a GHG emissions reduction target for the year 2030 of 39% below baseline 2021 levels. This aligns with the 2022 Scoping Plan Scenario excluding industrial stationary sources and exceeds the statewide target of 40% below 1990 levels by 2030 pursuant to SB 32. Consistency with the 2022 Scoping Plan and SB 32 is an appropriate metric by which to determine the significance of the CAP’s GHG emissions through 2030. As explained in CEQA Guidelines Section 15064.4(b)(3), a lead agency “may consider a project’s consistency with the state’s long-term climate goals or strategies” when determining the significance of a project’s cumulative GHG emissions impacts. Therefore, the CAP’s 2030 target represents the level below which GHG emissions would not be cumulatively considerable in the year 2030. The CAP also identifies a GHG emissions reduction target for the year 2045 of 83% below baseline 2021 levels, which is equivalent to

Elements of a Plan for the Reduction of Greenhouse Gas Emissions [CEQA Guidelines 15183.5(b)(1)]	Climate Action Plan Compliance with Elements
	<p>85% below 1990 levels, and therefore aligned with the statewide target of 85% below 1990 levels by 2045 pursuant to AB 1279. Consistency with the 2022 Scoping Plan and AB 1279 is an appropriate method of determining that the 2045 GHG emissions are not cumulatively considerable. Chapter 2: GHG Strategy contains a summary of the GHG emissions reductions targets for 2030 and 2045 and a discussion of the CAP's aspirational net-zero emissions goal for 2045.</p>
<p>(C) Identify and analyze the GHG emissions resulting from specific actions, or categories of actions anticipated within the geographic area.</p>	<p>The CAP's inventory of existing GHG emissions and emissions forecasts accounts for existing and future changes from on-road and off-road transportation, electricity, natural gas, solid waste, agriculture, water, and wastewater. The forecasts of future emissions analyze how existing emissions are expected to change over time under a business-as-usual scenario and an adjusted business-as-usual scenario that accounts for state and federal legislative reductions. The CAP identifies 16 measures and numerous implementing actions to reduce GHG emissions within unincorporated areas of the county to achieve the 2030 and 2045 targets for community-wide GHG emissions. Additionally, the CAP identifies six measures and numerous implementing actions to reduce County government operations emissions to achieve the 2030 and 2045 targets for government operations.</p>
<p>(D) Specify measures or a group of measures, including performance standards that substantial evidence demonstrates, if implemented on a project-by-project basis, would collectively achieve the specified emissions level.</p>	<p>The CAP sets forth a package of strategies, measures, and implementing actions and presents analysis demonstrating that their collective implementation would achieve the 2030 and 2045 targets established in the CAP. The CAP also identifies how, if these measures were implemented on a project-by-project basis, the measures collectively would achieve the 2030 and 2045 targets. The CAP includes a preponderance of mandatory (versus voluntary) measures and actions, measures that address the largest GHG emissions sources (such as building energy use and transportation), a focus on core measures that are likely to reduce large amounts of emissions, transparency in methods of quantification, and no reliance on voluntary carbon offsets.</p>
<p>(E) Establish a mechanism to monitor the plan's progress toward achieving the level and to require amendment if the plan is not achieving specified levels.</p>	<p>The CAP includes a detailed plan for implementing, monitoring, and reporting on the CAP, including how the CAP would be updated periodically, that would evaluate the effectiveness of CAP measures and actions and include regular emissions inventory updates to ensure the County is on track to meet the GHG reduction targets. The implementation plan also includes details regarding funding and financing options and a list of available and expected funding sources, along with a table for monitoring and reporting progress on the measures and their implementing actions. The County would prepare annual GHG emissions inventory updates. The next comprehensive CAP update would coincide with the 2030 General Plan Update. Focused minor updates may occur in response to annual monitoring and reporting. The comprehensive CAP update will include updated inventories and forecasts, adjustments to reduction measures and</p>

Elements of a Plan for the Reduction of Greenhouse Gas Emissions [CEQA Guidelines 15183.5(b)(1)]	Climate Action Plan Compliance with Elements
	actions, and updates to the implementation strategy. It would also include refined cost estimates and updated funding sources.
(F) Be adopted in a public process following environmental review.	The County has prepared this Subsequent Environmental Impact Report (SEIR) to evaluate the environmental effects of CAP implementation. The SEIR will be circulated for a 45-day public review and comment period, along with the Public Draft CAP. The Board of Supervisors will consider whether to certify the SEIR and adopt the CAP at a public hearing.

Source: Compiled by Ascent in 2024.

This SEIR does not provide project-level review of specific development projects in the county. Therefore, consistent with CEQA Guidelines Section 15168, future discretionary activities may require subsequent CEQA analysis if their impacts are not adequately considered and mitigated, as necessary, in this SEIR, the GPU EIR, or any other EIR that may be applicable to a proposed development. If substantial evidence exists that the effects of a particular project may be cumulatively considerable notwithstanding the project's compliance with the specified requirements in the plan for the reduction of GHG emissions (i.e., the CAP), a CEQA analysis of GHG emissions would be prepared for the project.

DETERMINING GREENHOUSE GAS EMISSIONS AT THE PROJECT LEVEL

After adoption of the CAP, all discretionary projects that are subject to CEQA would be evaluated for consistency with the CAP. If a future project is consistent with the County’s General Plan, it could use the CEQA streamlining provision (CEQA Guidelines Section 15183.5), which would allow the project to tier from and incorporate by reference the GHG emissions analysis presented in this SEIR, upon certification. The CAP Consistency Review Checklist (Appendix B to the CAP, the “Checklist”) would be used to demonstrate compliance. Future projects that intend to streamline would be required to implement applicable GHG emissions reduction measures as adopted in the CAP and outlined in the Checklist through project design features, conditions of approval, or mitigation measures. Therefore, the Checklist would provide a mechanism for projects to specifically demonstrate compliance with “those requirements specified in the plan that apply to the project, and, if those requirements are not otherwise binding and enforceable, incorporate those requirements as mitigation measures applicable to the project” per CEQA Guidelines Section 15183.5(b)(2).

If a project would be consistent with the General Plan and it demonstrates consistency with the CAP by satisfying all Checklist criteria, then the project would be considered consistent with the CAP and would be eligible for CEQA streamlining of its project-level GHG analysis. If a project would not be consistent with the General Plan’s land use designations, however, then it would not be eligible for streamlining. Projects requiring General Plan amendments that would result in an increase in density or intensity beyond what is allowed in the General Plan and reflected in the GHG emission projections contained in the CAP would be subject to the County’s adopted GHG

thresholds and would be required to conduct a project-level assessment. Such an analysis would quantify existing and projected GHG emissions for the project and would incorporate applicable items from the Checklist to the maximum extent feasible, along with any identified project-specific mitigation measures. If the project is requesting a General Plan amendment but not requesting an increase in density or intensity beyond what is allowed in the General Plan and GHG emission projections contained in the CAP, then the project could achieve consistency with the CAP by implementing applicable GHG emissions reduction measures as adopted in the CAP and outlined in the Checklist. An analysis would be required to demonstrate how the project would achieve consistency with the CAP.

Therefore, the qualified CAP, this SEIR, and the CAP Consistency Review Checklist are based on substantial evidence and work together to provide the programmatic environmental review and streamlining mechanism for evaluating the GHG emissions of future development projects.

The Checklist will be used only for projects that wish to streamline their CEQA GHG impact analysis pursuant to CEQA Guidelines sections 15064(h)(3), 15064.4 and 15183.5(b)(2). Demonstrating consistency with the Checklist is a voluntary option that project applicants can use to streamline their project's GHG impact analysis. The Checklist is a tool exclusively for projects intending to streamline from this SEIR.

2.5 PROJECT CONSISTENCY WITH APPLICABLE PLANS

The CAP is developed in the context of existing regional and County plans and policies that support the reduction of GHG emissions and prepare the community for the anticipated effects of climate change. These include:

- Adopted General Plan policies that guide resource conservation in future land development and transportation planning.
- Sacramento County's Transportation Analysis Guidelines (Sacramento County 2020), establishing VMT as the metric for evaluating potential environmental impacts from transportation in new development projects pursuant to SB 743.
- The County-led update to the Sacramento County Local Hazard Mitigation Plan (Sacramento County 2021), in coordination with incorporated cities, reclamation districts, and other special districts.
- The region-wide Sustainable Communities Strategy adopted by the Sacramento Area Council of Governments in 2019 (SACOG 2019), which provides policies and implementation actions for GHG emissions reductions in the on-road transportation sector, consistent with statewide targets set by CARB.
- Sacramento Metropolitan Air Quality Management District guidance to lead agencies, updated in April 2020, on reducing GHG emissions from new land development projects through best management practices (SMAQMD 2020).

- Sacramento County’s GHG significance thresholds, adopted in December 2020, for evaluating the potential climate change impacts of new projects subject to CEQA.
- The County’s declaration of a climate emergency in December 2020.
- SMUD’s energy efficiency programs for Sacramento County residents, which track performance by reduction of carbon emissions, and Resolution No. 21-04-05, which aims to transition all electricity delivered to customers in Sacramento County to GHG-free sources by 2030.
- Sacramento Regional Transit initiatives, which include providing county residents access to micro-transit, electric buses, and expanded light rail service.
- Sacramento County’s Active Transportation Plan (Sacramento County 2022), which guides County staff, public officials, residents, and developers to build a balanced transportation system that supports and encourages active modes of travel, and which promotes (and encourages people to choose) walking, biking, and rolling by creating safe, comfortable, connected, and accessible networks; encouraging alternatives to single-occupancy vehicle trips; and improving access to transit.

2.6 INTENDED USES OF THE SUBSEQUENT EIR

The SEIR will serve as an informational document for decision-makers and the public. The County Board of Supervisors will review and consider the information contained in the SEIR pursuant to its evaluation of whether to approve the project. The SEIR is not intended to recommend either approval or denial of a project. If the project will have significant and unavoidable environmental impacts (i.e., no feasible mitigation is available to reduce the impact to a less-than-significant level), the Board of Supervisors may still approve the project if it believes that social, economic, or other benefits outweigh the unavoidable impacts. The Board of Supervisors would then be required to make findings and state, in writing, the specific reasons for approving the project, based on information in the SEIR and other information in the administrative record.

Table 2-8: Proposed Greenhouse Gas Emissions Reduction Measures and Actions

Measure	Action ID	CAP Action Description
<p>Measure GHG-01: Develop a Carbon Farming Program</p> <p>Create a County program to increase carbon farming to achieve:</p> <ul style="list-style-type: none"> • Application of compost instead of synthetic fertilizer to approximately 25,000 acres of cropland by 2030, and 113,000 acres of cropland by 2045. • Grazing management to improve rangeland conditions, applied to approximately 13,000 acres by 2030, and 61,000 acres by 2045. • Decrease fallow frequency or add perennial crops to rotations applied to approximately 7,000 acres by 2030, and 32,000 acres by 2045. • Tillage reduced, eliminated, or changed to strip tilling on approximately 1,000 acres by 2030, and 4,000 acres by 2045. 	GHG-01-a	Initiate a partnership with Carbon Cycle Institute (CCI) and the University of California Cooperative Extension (UCCE) Capital Corridor unit, or other similar organizations, to develop a carbon farming program that engages farmers, ranchers, and land managers to share carbon farming best practices, provide grant application assistance for carbon farming practices, and track data on soil management practices.
	GHG-01-b	Establish a County staff role or identify adequate support through partnerships with non-profit organizations (or a combination of both) to support implementation of a carbon farming program, including managing incentives, outreach, grant application support, and reporting under the program.
	GHG-01-c	Develop a farming practices and soil management reporting incentive, in which County staff will assist farmers, ranchers, and land managers in preparation of carbon farming grant applications if farmers, ranchers, and land managers commit to annual reporting on soil management and carbon farming practices. UCCE has staff who assist with grant applications (free of charge) and can support in this effort.
	GHG-01-d	Encourage reporting of soil management practices by facilitating optional reporting on current practices to all farmers, ranchers, and land managers during annual crop report data collection, including acres where the following practices are applied: <ul style="list-style-type: none"> • Application of compost/biochar • Grazing management on irrigated pastures • Reduction in fallow land • Increase in perennial crops • Strip tilling or tillage reduction
	GHG-01-e	Develop and maintain a list of current and upcoming carbon farming and healthy soil grant opportunities on the County Agricultural Commissioner's website, including semi-annual reviews and updates to grant opportunities. Include a hyperlink to this list in any external communications, such as newsletters or engagement materials for other programs. Examples of known potential funding sources related to carbon farming are included in Appendix F (GHG Reduction Measures Cost and Potential Funding Sources).

Measure	Action ID	CAP Action Description
	GHG-01-f	<p>In partnership with CCI and UCCE, or other similar organizations, develop a Carbon Sequestration Agricultural Practices for Sacramento County study that includes the following information:</p> <ul style="list-style-type: none"> • Carbon sequestration practices suited for Sacramento County land including: <ul style="list-style-type: none"> • Compost application • Nonsynthetic fertilizer application • Grazing management • Rotational cropping • Tilling practices • Co-benefits of implementing carbon sequestration practices. • A list of a variety of financial and technical resources that are available to assist farmers and ranchers in implementation.
	GHG-01-g	<p>In partnership with the Sacramento County Farm Bureau and other organizations such as CCI or UCCE, develop and share educational materials about soil management and carbon farming best practices, such as a "Carbon Sequestration Agricultural Practices for Sacramento County" study, and information about soil management reporting and grant application assistance.</p>
	GHG-01-h	<p>Continue to provide free or reduced cost compost produced by County-contracted organics processing facilities to residents in the County on a first come, first served basis.</p>
	GHG-01-i	<p>Establish a terrestrial/agricultural carbon finance committee to identify finance mechanisms and funding sources to support the ongoing development and implementation of carbon farming programs in Sacramento County. This could include, but not limited to, assessment of participation in the voluntary carbon markets; the development of a local carbon or ecosystem marketplace; revolving loan funds; matching funds that can be used in conjunction with outside funding; and/or state funding.</p>
<p>GHG-02: Expand the Urban Forest</p> <p>Maintain and enhance the urban forest, planting 15,000 net new trees by 2030 and 62,000 net new trees by 2045.</p>	GHG-02-a	<p>Develop and adopt an Urban Forest Management Plan to increase and maintain the urban forest, which includes:</p> <ul style="list-style-type: none"> • the identification of potential tree planting sites to meet goals of 15,000 net new trees by 2030 and 62,000 net new trees by 2045, highlighting priority areas in Environmental Justice Communities; • street and park tree preservation; • tree species and design guidelines, prioritizing native trees; and • watering and maintenance practices.

Measure	Action ID	CAP Action Description
	GHG-02-b	Develop and annually update an urban forest work plan to identify a budget and specific tree planting and maintenance projects for implementation each year consistent with the goals and targets of the Urban Forest Management Plan.
	GHG-02-c	Adopt an ordinance to require new development to plant an appropriate number of trees onsite to provide a 50 percent canopy cover over parking surfaces and a 20 percent canopy cover over the remainder of the site. Exemptions to the ordinance may be provided in cases where the tree canopy may conflict with solar PV system siting on the development site, or with the Solar Shade Control Act.
	GHG-02-d	<p>Amend the Tree Preservation Ordinance to require that</p> <ul style="list-style-type: none"> • applicable tree removal during discretionary projects on private property that require a tree permit be replaced by an appropriate size and species tree as determined by Planning and Environmental Review and. • where onsite replacement of an appropriate tree is not feasible, the permit applicant shall pay a fee equivalent to the County's cost for planting and maintaining each appropriate tree to the Tree Preservation Fund. <p>Also amend the ordinance to expand the tree types for which the ordinance is applicable to include:</p> <ul style="list-style-type: none"> • any tree native to Sacramento County; and • "heritage trees" that are 50 years or older or have connection to a historical event, building, district or person.
	GHG-02-e	Continue to partner with the Sacramento Tree Foundation to use existing programs such as Sacramento Shade, NeighborWoods, and NATURE to increase the tree canopy through offering free tree planting on private property, prioritizing drought-tolerant species in Environmental Justice Communities.
	GHG-02-f	Identify and partner with community cooperatives, and Sacramento Tree Foundation, to organize at least three tree-planting and maintenance events each year in different census designated places in the unincorporated county, to highlight and realize the community benefits of urban trees.
	GHG-02-g	Inform county residents and businesses of the availability of free trees, from partnerships with Sacramento Tree Foundation, by including information on accessing the program on the County's website and through semi-annual newsletters, social media posts, or mailers.

Measure	Action ID	CAP Action Description
	GHG-02-h	Conduct a targeted outreach campaign to promote the availability of free trees, from partnerships with Sacramento Tree Foundation, in Environmental Justice Communities that may include multilingual printed outreach materials and promotion at community events. .
	GHG-02-i	Identify appropriate community-based organizations, and jointly submit applications for grant funding for urban forest expansion in underserved communities through the US Forest Service’s Urban and Community Forestry Grant Program.
	GHG-02-j	Develop a tracking system to ensure that the number of trees planted through County efforts are trackable, through internal County departments, the County’s permitting system, and annual data requests from partner organizations on the number of trees planted, and removed, in the unincorporated county.
<p>GHG-03: Support the SMUD Zero Carbon Plan</p> <p>Support SMUD in the implementation of the 2030 Zero Carbon Plan, by:</p> <ul style="list-style-type: none"> Identifying sites and capacity for installation of renewable energy resources and battery storage at County-owned buildings and properties. Supporting installation of 70 MW of rooftop solar photovoltaic and 28 MW of behind-the-meter battery storage between 2025 and 2030. Supporting installation of 281 MW of rooftop solar photovoltaic and 112 MW of behind-the-meter battery storage between 2025 and 2045.. 	GHG-03-a	In coordination with SMUD, conduct a feasibility study to identify opportunities for installing renewable energy resources and battery storage at County-owned buildings and properties.
	GHG-03-b	Coordinate with SMUD to identify potential sites for renewable generation and storage projects in the unincorporated county that would best support overall grid functionality while also supporting other measures to electrify the building stock and maximizing the use of existing electrical infrastructure.
	GHG-03-c	Continue to encourage and streamline the permitting of rooftop solar and battery storage projects for existing buildings. The County already offers a streamlined and automated permitting process for residential solar projects through its SolarAPP+ tool, and the County’s AP-25 Solar PV Information Package and Checklist identifies permit requirement and fee schedules for both residential and nonresidential solar installations. The County will update these resources to address solar and battery storage projects where appropriate.
	GHG-03-d	At the time of development of any building reach codes (see Measures GHG-04, GHG-05, and GHG-07), coordinate with SMUD to identify appropriate measures to support SMUD’s building and transportation electrification, and distributed energy resources goals. Reach code compliance under these measures may include distributed renewable energy resources and energy storage technologies.
	GHG-03-e	Update the County Zoning Code to include land use requirements and development standards for stand-alone distributed energy resource facilities, including battery energy storage facilities.
	GHG-03-f	Establish a County staff liaison to coordinate directly with SMUD, and meet with SMUD on a regular basis (at least annually), to address ways in which both the County and SMUD can support each other in reaching their near-term (2030) and long-term decarbonization goals.

Measure	Action ID	CAP Action Description
<p>GHG-04: Accelerate Existing Building Energy Efficiency Retrofits and Decarbonization</p> <p>Existing residential buildings:</p> <ul style="list-style-type: none"> • 28,000 residential units retrofit by 2030 at half of maximum cost-effectiveness score, and • 111,000 homes retrofit by 2045 at maximum cost-effectiveness score. <p>Existing nonresidential buildings:</p> <ul style="list-style-type: none"> • Develop strategy and implement a building performance standards program which requires all nonresidential buildings to reduce non-electricity emissions 19% by 2030 and 85% by 2045. • Implement and enforce a building performance standards program. 	GHG-04-a	Work with the California Energy Codes and Standards Program to develop reach codes and associated cost-effectiveness studies that must be met by existing buildings such that existing residential buildings' modeled energy efficiency must achieve half of the maximum cost-effective score at the time-of-retrofit by 2030, and the maximum cost-effective score by 2045. <i>(Note: Cost-effectiveness scores are a potential compliance mechanism for a reach code pathway that provides flexibility to implement measures that are assigned a numeric value, with a combination of measures meeting the target cost-effectiveness score.)</i>
	GHG-04-b	Develop an existing nonresidential buildings decarbonization strategy and implement a building performance standard that requires all buildings to reduce non-electricity-related emissions by 19 percent by 2030 and by 85 percent by 2045, with analysis of the existing building stock in the county.
	GHG-04-c	Determine reach code compliance triggers which may be based on one or more metrics for retrofits such as time of equipment replacement, percent of existing floor area, building permit valuation, and project valuation; and based on square footage for existing nonresidential buildings.
	GHG-04-d	Conduct stakeholder outreach with building industry members, contractors, residents, businesses, and other interest groups to present the reach code options and solicit feedback.
	GHG-04-e	Develop and adopt an ordinance(s) to implement the existing building reach code(s) based on the cost-effectiveness studies (completed as part of Action GHG-04-a) and stakeholder outreach (completed as part of Action GHG-04-c).
	GHG-04-f	Submit the ordinance(s) and cost-effectiveness studies for the existing building reach code(s) to the California Energy Commission (CEC) for review and approval.
	GHG-04-g	Conduct training for County permitting staff to understand the reach code requirements for existing buildings and how compliance will be demonstrated.
	GHG-04-h	<p>Implement and staff a building performance standards program that:</p> <ul style="list-style-type: none"> • proactively engages with and enrolls nonresidential building owners and operators into a building performance standards program, • develops a mechanism for building owners and operators to report energy use and emissions data, • develops and distributes information on how to measure performance, maintain compliance, and reduce energy use and GHG emissions, and • enforces compliance with the building performance standards program, • compiles and reports data on the building performance standards program for CAP monitoring, such as the number of buildings enrolled in the program and GHG reductions achieved.

Measure	Action ID	CAP Action Description
	GHG-04-i	Develop a tracking system for the types of measures implemented to maximize energy efficiency and decarbonization, energy efficiency upgrades, or pre-wiring completed by applicants pursuant to reach code requirements for existing buildings.
	GHG-04-j	<p>Develop an outreach program that provides education strategies that enable and encourage energy conservation and gas-to-electric conversions in residential and commercial buildings for space and water heating. Develop and/or share existing online educational materials targeted toward building owners and tenants that are hosted on the County's website on energy efficiency and building electrification; including training, fact sheets, information on available incentives, video tutorials, and links to existing content (such as The Switch is On). In addition to education, video tutorials can explain to building owners how to enroll in real-time energy use monitoring tools to track energy use compared to historic levels and within the community through the EnergyStar™ Portfolio Manager, or other tools offered by third-party providers. The educational materials will also be provided as part of routine regulatory processes, such as applying for or renewing licenses or permits. Listed incentives should include, but not be limited to:</p> <ul style="list-style-type: none"> • SMUD Residential and Business Rebate programs • Energy Efficient Commercial Buildings Deduction tax credits program (179D) • US Department of Energy's Homeowner Managing Energy Savings (HOMES) rebate program • US Department of Energy's High-Efficiency Electric Home Rebate (HEEHRA) program
	GHG-04-k	Review the existing permitting processes for residential building owners seeking to replace natural-gas-powered equipment with electric equipment and modify as needed to reduce complexity, cost, and processing time for any required permits.
	GHG-04-l	Offset or reduce permitting fees for applicants for building retrofits that include all-electric conversion of mixed-fuel buildings and capping of natural gas lines to encourage exceedance of existing building reach code requirements.
	GHG-04-m	Partner with the Sacramento Employment and Training Agency (SETA), Construction Trades Workforce Initiative (CTWI), Sacramento-Sierra Building and Construction Trades Council (SBCTC), Sacramento Regional Builders' Exchange (SRBX), and/or Northern California Construction Training to develop a training program targeted toward developing the knowledge and skills of contractors and construction workers to support electrification of existing buildings.

Measure	Action ID	CAP Action Description
	GHG-04-n	Develop a revolving loan fund to provide low-interest loans to low-income residents and residents in Environmental Justice Communities to cover the time-of-replacement/emergency replacement of water heaters and/or HVAC units with electric options, ensuring that loans can be processed quickly and efficiently with equitable procedural access. Solicit donations and pursue grant funding opportunities to seed the revolving loan fund.
	GHG-04-o	Review any County-adopted existing building reach codes at the release of each triennial building code cycle for updates to align with new cost-effective electrification pre-wiring and energy efficiency measures, such that the County's existing building reach codes are in line with the most recent decarbonization guidance and cost-effectiveness data.
<p>GHG-05: Decarbonize New Buildings</p> <p>Residential buildings to meet or exceed a modeled EDR1 (hourly source energy) metric of 11.5 points above the Title 24, Part 6, including:</p> <ul style="list-style-type: none"> • 22,000 new residential units built by 2030, and • 46,000 new residential units built by 2045. <p>Nonresidential buildings:</p> <ul style="list-style-type: none"> • Adopt and enforce a reach code such that new construction reduces non-electricity-related emissions by 85% below 2022 Title 24, Part 6 equivalent emissions for each nonresidential buildings type. 	GHG-05-a	<p>Work with the California Energy Codes and Standards Program to develop cost-effective reach codes that must be met by all new construction. The reach codes will include the following performance standards:</p> <ul style="list-style-type: none"> • Residential: Projects must meet or exceed a modeled EDR1 (hourly source energy) metric of 11.5 points above the 2022 Title 24, Part 6 statewide performance minimum (the “standard design building”). • Nonresidential: Projects must reduce non-electricity-related GHG emissions by 85 percent below 2022 Title 24, Part 6 equivalent emissions for each nonresidential buildings type.
	GHG-05-b	Provide fee reductions or offsets and expedited permitting for residential and nonresidential projects that are built all-electric and do not include new natural gas infrastructure piping.
	GHG-05-c	Conduct stakeholder outreach with building industry members, contractors, residents, businesses, and other interest groups to present the reach code options and solicit feedback.
	GHG-05-d	Develop and adopt an ordinance(s) to implement new construction building reach code(s) based on the cost-effectiveness studies (completed as part of Action GHG-05-a) and stakeholder outreach (completed as part of Action GHG-05-c).
	GHG-05-e	Submit the ordinance(s) and cost-effectiveness studies for new construction building reach code(s) to the California Energy Commission for review and approval.
	GHG-05-f	Conduct training for County permitting staff to understand the reach code requirements for new buildings and how compliance will be demonstrated.
	GHG-05-g	Engage with the California Energy Codes and Standards Program to continually monitor and reassess legal and regulatory barriers requiring all-electric new construction and develop pathways for eliminating the expansion of natural gas infrastructure in the county as feasible.

Measure	Action ID	CAP Action Description
	GHG-05-h	Develop a tracking system for the number of housing units and nonresidential square footage that is built to comply with the new reach code.
	GHG-05-i	Provide information regarding new reach code requirements and any incentives to contractors, potential owners, and building applicants by publishing information on the County website, developer/business group-focused communications, and at the permit counter. This should also include information on grant funding opportunities, such as the Building Initiative for Low-Emissions Development Program (or BUILD), and 179D tax credits.
	GHG-05-j	Partner with the Sacramento Employment and Training Agency, Construction Trades Workforce Initiative, Sacramento-Sierra Building and Construction Trades Council, Sacramento Regional Builders' Exchange, and Northern California Construction Training to develop a training program targeted toward developing the knowledge and skills of contractors and construction workers to support the construction of all-electric buildings. (Note that this action may be combined with Action GHG-04-k.)
GHG-06: Retire Fossil-Fuel-Powered Landscaping Equipment Facilitate trade-in of fossil-fuel-powered landscaping equipment for electric equivalents. Aim to retire approximately 78,000 pieces of equipment by 2030 and 352,000 by 2045.	GHG-06-a	Work with SMAQMD to implement a landscaping equipment trade-in program that provides vouchers for purchasing electric landscape equipment to residents and businesses that trade in fossil fuel-powered landscaping equipment.
	GHG-06-b	Explore the feasibility of and funding opportunities for expanding the landscaping equipment trade-in program which may include: <ul style="list-style-type: none"> • organizing trade-in events at convenient locations for residents throughout the county, multiple times per year; and • establishing additional permanent drop-off locations at other County-operated facilities.
	GHG-06-c	Develop a tracking system for the equipment exchanged by applicants through the landscaping equipment trade-in program including number and type of equipment.
	GHG-06-d	Share information regarding incentives including CARB's zero-emission landscaping equipment incentive program and SMAQMD's Commercial Lawn and Garden Program , if available, and co-benefits of using electric landscaping equipment through newsletters, social media post, and the County's website.
GHG-07: Increase EV Charging and ZEV Infrastructure Plan for and deploy increased EV network capacity and other ZEV infrastructure in the unincorporated county, installing 24,000 EV	GHG-07-a	Develop and adopt an ordinance that amends the building code to require EV charging capability consistent with the latest version of CALGreen Tier 2 Voluntary Measures, at the time of ordinance development, for the following project types: <ul style="list-style-type: none"> • New single-family residential, • New multifamily residential, • New nonresidential (both light-duty and medium-/heavy-duty requirements).

Measure	Action ID	CAP Action Description
chargers by 2030 and 72,000 EV chargers by 2045 through both County direct installation and requirements for new development and retrofit projects.	GHG-07-b	<p>Develop and adopt an ordinance that amends the building code to require EV charging capability installation at existing nonresidential developments consistent with the latest version of CALGreen Tier 2 Voluntary Measures, at the time of ordinance development, to meet CALGreen Section 5.106.5.4.1 (i.e., Tier 2 EV requirements) for additions or alterations to existing buildings or parking facilities under the following conditions:</p> <ul style="list-style-type: none"> • When the scope of construction work includes an increase in power supply to an electric service panel as part of a parking facility addition or alteration. • When a new solar PV system is installed covering existing parking spaces. • When additions or alterations to existing buildings are triggered pursuant to CALGreen and the scope of work includes an increase in power supply to an electric service panel.
	GHG-07-c	<p>Develop and adopt an ordinance that amends the building code to require EV charging capability installation at existing multifamily residential developments consistent with the latest version of CALGreen Tier 2 Voluntary Measures, at the time of ordinance development, to meet CALGreen Section 4.106.4.3 (i.e., Tier 2 EV requirements) for additions or alterations to existing buildings or parking facilities under the following conditions:</p> <ul style="list-style-type: none"> • When new parking facilities are added. • When a new solar PV system is installed covering existing parking spaces. • When electrical systems or lighting of existing parking facilities are added or altered, and the work requires a building permit. • When additions or alterations to existing buildings are triggered pursuant to CALGreen and the scope of work includes an increase in power supply to an electric service panel.
	GHG-07-d	<p>Develop a "Sacramento County Zero-Emission Vehicle Infrastructure Deployment Strategy" to prepare Sacramento County for the widespread adoption of electric vehicles (EVs), hydrogen fuel cell vehicles, or other types of ZEVs, and install public EV chargers in the unincorporated county and provide hydrogen-fueling and other renewable fuel options, using the Electric Vehicle Readiness and Infrastructure Plan as a foundation. The strategy should:</p> <ul style="list-style-type: none"> • identify key areas for public EV charging access, including near multifamily developments and in Environmental Justice Communities. • assess additional electrical load capacity needs and limitations for EV charging. • assess biofuels, hydrogen, and other ZEV technology growth forecasts, and potential infrastructure needs to support growth in alternative fuel demand. • identify costs and funding and financing strategies for installation of EV charging infrastructure. • identify policy objectives to support an increased need for EV and alternative fuel infrastructure based on the analysis results.

Measure	Action ID	CAP Action Description
	GHG-07-e	Upon completion and adoption of the "Sacramento County Zero-Emission Vehicle Infrastructure Deployment Strategy", include new EV charging infrastructure projects annually in the Capital Improvement Program to provide the direct installation of at least 100 publicly available EV chargers per year.
	GHG-07-f	Adopt an ordinance requiring gas stations that undergo major renovations with a permit value over \$300,000 to install at least one EV DC fast charging station for every 10 fuel dispensers.
	GHG-07-g	Develop a system for tracking the number, type, and location of new EV chargers installed in the unincorporated county each year for permitted installations.
	GHG-07-h	<p>The Sacramento County Airport System (SCAS) will expand EV charging at county airports by doing the following:</p> <ul style="list-style-type: none"> • Develop an EV charging plan for County airports, taking into consideration the opportunities and constraints identified in the Energy Management Plan as specified under Action GOV-04-a. The plan will hierarchize EV charging for the public and employees. • SCAS currently hosts a pay-to-charge EV fueling facility at the Sacramento International Airport with eight DC fast chargers for passengers, employees, and commuters along the I-5 corridor. This facility is open 24-7 to allow EV drivers to charge their vehicles at any time. A second fueling station will be constructed in the Free Waiting Area to allow even greater access to charging. • Any new long-term parking facilities constructed will include an appropriate percentage of spaces equipped with Level 1 chargers, based on the EV charging plan. Average parking dwell times at the airport do not warrant charging in excess of Level 1. • Include signage for EV charging facilities for both wayfinding and parking restrictions. • Perform bi-annual reviews of publicly accessible EV charging utilization at Sacramento International Airport and install additional EV chargers as supported by demand.
	GHG-07-i	Prepare educational materials including pamphlets and video tutorials and conduct educational workshops to inform residents and businesses about new requirements, EVs rebates (like SMUD's Residential Rebate program, SMUD's Business Rebate program, the Clean Vehicle Tax Credit program, the Commercial Clean Vehicles tax credits program, and the Credit for Previously Owned Clean Vehicles program) and the expanded EV infrastructure. Educational materials and workshops will strive to be culturally compatible to be accessible to underserved and Environmental Justice Communities.

Measure	Action ID	CAP Action Description
	GHG-07-j	Partner with SMAQMD to secure additional funding for expanding the Our Community CarShare program to additional affordable housing developments in Environmental Justice Communities in the unincorporated county.
	GHG-07-k	Coordinate with regional ZEV initiatives developed or implemented by various agencies including, the Sacramento Regional Transit District (SacRT), City of Sacramento, SMUD, and SMAQMD to coordinate the activities of different agencies and simplify or unify permitting processes for the installation of EV charging or hydrogen refueling infrastructure and the deployment of ZEV fleets in the region.
	GHG-07-l	Update the County's EV infrastructure permitting process triennially (if needed) to maintain consistency with regional permitting best practices, and as permitting processes are updated perform internal trainings such that permitting staff understand the permitting, inspection, and enforcement process.
	GHG-07-m	Reassess and update the "Sacramento County Zero-Emission Vehicle Infrastructure Deployment Strategy", every five years to incorporate new market trends and technologies.
	GHG-07-n	Conduct a feasibility study on a County program to encourage early retirement of internal combustion engine (ICE) vehicles and replacement with electric vehicles. The program may assess the feasibility of offering rebates, tax credits, or other incentives such as a buyback plan.
	GHG-07-o	Based on the findings of the feasibility study described in GHG-07-n, the County may develop and implement a program to facilitate the early retirement of ICE vehicles.
<p>GHG-08: Develop a VMT Impact Fee Program</p> <p>Develop a VMT Impact Fee Program to require developers to contribute to regional VMT reductions when project-specific VMT cannot be mitigated to below significance thresholds after all feasible onsite mitigation has been implemented.</p>	GHG-08-a	<p>Develop a VMT Impact Fee Program to require developers to contribute to regional VMT reductions when project-specific VMT cannot be mitigated to below significance thresholds after all feasible onsite mitigation has been implemented:</p> <ul style="list-style-type: none"> • Additional to any VMT reduction projects or programs that would be implemented without the VMT Impact Fee as a funding source. • Verifiable for monitoring of achieved VMT reductions after project implementation. • Lasting the duration of the project's operational lifespan for which VMT is being mitigated through the VMT Impact Fee. • Having direct public benefits to low-income residents and Environmental Justice Communities.

Measure	Action ID	CAP Action Description
	GHG-08-b	Adopt an ordinance establishing the VMT Impact Fee Program that allows project proponents to pay for offsite VMT mitigation after all feasible onsite mitigation has been implemented and project VMT is still above the significance threshold. Detailed feasibility criteria will be developed and will include appropriate economic considerations to ensure that all feasible onsite VMT mitigation measures are prioritized and implemented prior to the development of offsite mitigation measures in the form of VMT Impact Fees.
	GHG-08-c	Establish a VMT Impact Fee fund to invest in VMT mitigation projects and a fee collection mechanism into which developers will pay.
	GHG-08-d	Create a VMT monitoring program that allocates County resources to the annual monitoring and reporting of VMT reductions achieved through the implementation of VMT mitigation projects funded through the VMT Impact Fee and compare against the estimated VMT reductions at the time of VMT Impact Fee collection .
	GHG-08-e	Reassess the projects available for offsite VMT mitigation through the VMT Impact Fee Program every three years, including the effectiveness of VMT mitigation through monitoring and reporting and the additionality of eligible projects.
	GHG-08-f	Develop an informational packet on the requirements and applicability of the VMT Impact Fee Program, focused on educating project applicants and County staff.
GHG-09: Reduce VMT from New Developments Update the requirements for TSM Plans to include a target of 15 % reduction in annual VMT below the regional average from all new developments through 2045.	GHG-09-a	Adopt an ordinance to update Section 5.9.6 of the Zoning Code to update the TSM Plan requirements so that new development projects will be required to establish a target of 15 percent reduction in annual VMT below the regional average, with a requirement for annual reporting of employees commute trips and VMT reduction target alignment, and a requirement to join 50 Corridor TMA/Sacramento TMA. The update should also provide additional and updated Trip Reduction Measures, such as parking cash-out and hybrid work policies.
	GHG-09-b	Develop a tracking mechanism that includes annual reporting requirements through a web portal to demonstrate ongoing compliance. The project owner/applicant will be required to report the following information annually: <ul style="list-style-type: none"> • Employee commute VMT • Modal split • Number of onsite employees • Number of full-time employees • Ongoing travel management programs • VMT reduction target progress

Measure	Action ID	CAP Action Description
	GHG-09-c	Partner with SACOG to provide up-to-date information about available transportation demand management (TDM) programs in Sacramento County through email and at time of annual reporting (See Action GHG-09-b) for all projects subject to Section 5.9.6 of the Zoning Code.
	GHG-09-d	Conduct a nexus study for imposing a fee structure for projects that do not meet the employee commute trip reduction requirements. Based on the results, impose a fee for projects that do not meet trip reduction requirements for three or more consecutive years. Fees collected should be used to fund micro-transit or other trip reduction projects.
	GHG-09-e	Develop an informational packet on the new requirements and applicability of TSM plans and the Zoning Code updates, focused on educating project applicants, facilities already required to submit TSM plans, and County staff.
GHG-10:1 Revise Parking Standards Revise parking standards for new developments to reduce housing costs in transit priority areas and reduce VMT.	GHG-10-a	Conduct a parking demand study that focuses on key rezone and infill growth areas to understand the current utilization of parking, and how transit access influences parking behaviors, to support the development of new minimum parking standards and shared parking opportunities. These areas should include at minimum: <ul style="list-style-type: none"> • North Watt Avenue Corridor • West Arden Arcade • Arden Way from Howe to Watt • Other aging commercial corridors identified in the General Plan Land Use Element
	GHG-10-b	Adopt an ordinance to update the Zoning Code to update the current parking standards for new developments, based on the results of a parking demand study, to lower minimum parking requirements and add requirements for shared parking facilities. Include mutually supportive parking management strategies for effective implementation and to mitigate potential parking spillover into surrounding areas. These include the following actions: <ul style="list-style-type: none"> • Unbundle parking for new developments. • Require residential area parking permits. • Implement on-street parking regulations.
	GHG-10-c	Measure outcomes of parking standard revisions by monitoring trends along corridors where unbundled parking is implemented including: <ul style="list-style-type: none"> • Transit ridership. • Housing costs compared to developments where parking standards were not changed.

Measure	Action ID	CAP Action Description
	GHG-10-d	Reassess the parking standards every five years with an aim to reduce housing costs near transit and support transit-priority development.
	GHG-10-e	Share information regarding new requirements through newsletters, the permitting counter, and the County's website to project applicants as soon as the ordinance is adopted.
<p>GHG-11: Increase Transit Ridership</p> <p>Partner with regional transportation agencies to increase transit ridership by 16% by 2030 and 43% by 2045, above 2021 levels, through implementation of the "Transit" policy plan in the Circulation Element.</p>	GHG-11-a	<p>Update the Traffic Impact Analysis (TIA) Guidelines, which guide traffic impact analyses for individual projects, to include assessments of public transit, including but not limited to:</p> <ul style="list-style-type: none"> • Accessibility of transit, including ADA accessibility, to pedestrians, in the project vicinity. • Need for route extensions/connectors and bus stops. • Adequacy of pedestrian and bicycle connections to transit, including bike paths and parking. • Impact of project-generated automobile trips on transit speeds and dwell time. • Assessment of project-generated transit trips on transit capacity.
	GHG-11-b	<p>Update the TIA Guidelines to require projects near transit to prioritize measures to improve and support transit access, which may include:</p> <ul style="list-style-type: none"> • Prioritize walking and biking connections to transit. • Allow for space and utility connections for high-quality bus stops at project frontages (e.g., electricity for bus stop lighting, signage, and surveillance; space for bike parking/lockers) in coordination with SacRT. • Prioritize improving transit quality at the project site over private shuttles. • Encourage transit use, for example through transit passes and/or other transit-specific initiatives.
	GHG-11-c	Continue to include SacRT and other appropriate transit providers, in the pre-application process and review of traffic impact analyses for new projects to verify that projects do not impact transit access and that any planned or identified transit infrastructure improvements are addressed.
	GHG-11-d	<p>Dedicate one County staff member as a Transit Coordinator to lead collaboration with regional partners and coordinate within the County's transportation planning and development review processes. Responsibilities and duties may include but are not limited to:</p> <ul style="list-style-type: none"> • Facilitate regular coordination with local transit agencies to align transit priorities and coordinate County support for local transit planning and implementation. • Participate in regional transit and transportation planning and represent the unincorporated county's interests, especially in Environmental Justice Communities.

Measure	Action ID	CAP Action Description
		<ul style="list-style-type: none"> • Prioritize funding for the most effective and equitable transit-supporting infrastructure to ensure access to transit is provided. • Track changes in travel patterns, vehicle ownership trends, and evolutions in transit service models (such as on-demand micro-transit) to maximize transit use and reduce VMT from light-duty vehicles. • Prioritize transit access improvements to reduce access barriers for seniors and people with physical disabilities, in coordination with the County ADA Coordinator • Coordinate land use zoning densities with existing and future mass transit station locations to ensure denser land use within one-half to one mile of rail or BRT (or other high-capacity transit) stations. • Review road space and work with regional transit providers to re-allocate road space and change traffic operations to prioritize transit (e.g., bus-only lanes, pullouts).
	GHG-11-e	<p>Meet regularly with SacRT and SACOG transit and transportation planners serving the county to identify actions the County can take to help improve access to transit including, but not limited to:</p> <ul style="list-style-type: none"> • Identifying, prioritizing, and funding short-term needs for transit improvements in the unincorporated county based on the greatest need and highest impact (e.g., repairing dilapidated transit shelters and stops, addressing immediate safety concerns on or near transit stops, ensuring adequate bike parking at stops). • Identifying, prioritizing, and funding long-term transit access improvements based on the greatest need and highest impact. • Identifying priority transit areas, leveraging SACOG’s data capabilities to identify areas that can benefit most from increased transit access. • Understanding transit demand and parameters that will help increase ridership (e.g., station types, safety considerations, type of services, frequency) (SACOG Next Transit Strategy: UX.COM.3). • Supporting non-County transit access projects (e.g., first mile/last mile projects like bike/e-scooter share partnerships, TNC reimbursements, and micro-transit for rural areas). • Developing an aggressive joint marketing strategy to increase awareness and understanding of transit service, first/last-mile amenities, and transit access and wayfinding, and advertising improvements and benefits of transit. Combining efforts with active transportation marketing. • Supporting passenger safety.

Measure	Action ID	CAP Action Description
	GHG-11-f	Annually request transit ridership data within unincorporated Sacramento County from SACOG and SacRT to monitor transit utilization and transit mode share.
	GHG-11-g	Provide and improve connections to transit stations by identifying, prioritizing, and seeking funding to plan and construct roadways, bikeways, and pedestrian improvements within a ½ mile of existing and planned transit stations (implemented through GHG-12).
	GHG-11-h	Explore a potential partnership with SacRT to expand transit access when developing the VMT Mitigation Fee (see GHG-08).
	GHG-11-i	Continue to partner with SacRT, incorporated cities, school districts, and other supporting organizations in a long-term cost-sharing program to provide fare-free transit for youth (i.e., ages 4-18) in SacRT's service area. This program removes barriers to youth transit ridership and enhances mobility options for families while also reducing VMT and GHG emissions.
GHG-12: Implement the Active Transportation Plan Improve active transportation infrastructure through implementation of priority projects identified in the 2022 Active Transportation Plan that include 66 pedestrian spot improvements, 51 miles of sidewalk gap closures, and bicycle projects representing 190 miles by 2030, and all recommendation projects identified in the ATP by 2045.	GHG-12-a	Develop and adopt an implementation plan for the goals and implementation measures included in the 2022 ATP.
	GHG-12-b	Update the Zoning Code and/or Design Guidelines to clarify the preferred siting of both short-term and long-term employee bicycle parking to encourage bicycle use at commercial, multi-family, industrial, or institutional uses.
	GHG-12-c	Continue to include active transportation projects in the transportation Capital Improvement Plan as project funding is secured.
	GHG-12-d	Implement Safe Routes to School programs and infrastructure improvements identified in the ATP as funding becomes available, with programs and infrastructure upgrades implemented at 6 schools by 2030 and the remainder of schools in the unincorporated County by 2045. The County has already secured funding for and hired a consultant to implement Safe Routes to School programming at the following schools: Thomas Edison Elementary, Howe Elementary, Fern Bacon Middle, Pacific Elementary, Nicholas Elementary, and Ethel Baker Elementary.

Measure	Action ID	CAP Action Description
	GHG-12-e	<p>Develop a Complete Streets Design Guide based on Caltrans' Design Information Bulletin #94 (Complete Streets: Context Design Guidance) and other best practices to provide policy and design guidance on the planning, design, and operation of county roadways to be used in the following situations:</p> <ul style="list-style-type: none"> • When designing future streets or reconstructed streets in an area experiencing redevelopment, • When implementing a capital improvement project, such as the construction or reconstruction of a street, intersection, or bridge, and • When resurfacing a street or conducting major work in the street, which may create an opportunity to reconsider some aspects of the street's design.
<p>GHG-13: Advance Infill Development Implement the Infill Development Program to advance infill development in Priority Areas through 2030 and 2045.</p>	GHG-13-a	<p>Designate an Infill Coordinator position within the Planning and Environmental Review Division which will lead and oversee implementation of the Infill Development Program, including, but not limited to:</p> <ul style="list-style-type: none"> • Oversee coordination with internal County departments and external stakeholders throughout the development process. • Identify the major barriers to quality infill development and develop strategies for addressing the removal of those barriers. • Lead development of policies, development codes, and zoning codes that support infill. • Support staff training on any relevant policies and codes designed to support infill • Develop and oversee administration of incentives for quality infill projects.
	GHG-13-b	<p>Conduct a nexus study for imposing a fee structure for projects that do not meet defined standards for infill development (Infill Fee) to provide financial support for infill projects. Activities that may facilitate infill development or redevelopment using the infill fee fund, include but are not limited to:</p> <ul style="list-style-type: none"> • design assistance, • fee deferrals, • application fee reductions or offsets, • staff support for Property Business Improvement District formation and capacity building, • EV charging facilities and other mobility hub infrastructure, and • code amendments that may be necessary for the conversion of existing commercial or office buildings to residential uses.

Measure	Action ID	CAP Action Description
	GHG-13-c	<p>Establish an Infill Fee fund using payments from non-infill development projects with the following requirements:</p> <ul style="list-style-type: none"> • Developers/builders of projects for non-infill developments, shall pay the County the appropriate amount determined by the nexus study for each dwelling unit equivalent (DUE); provided that the Infill Fee shall not be paid for any unit constructed on any parcel dedicated to the Sacramento Housing and Redevelopment Agency (SHRA) pursuant to an applicable Affordable Housing Strategy. • The fee shall be adjusted annually on January 1 based on the Engineering News Record Construction Cost Index. • This fee shall be paid to the County upon issuance of a building permit for the development and deposited into a separate account dedicated to facilitating infill development or redevelopment.
	GHG-13-d	Adopt an ordinance to update the Zoning Code establishing the Infill Fee requirements for all new non-infill development projects.
	GHG-13-e	Continue to engage with SACOG in regional planning efforts to secure funding and implement programs (such as the Green Means Go Pilot Program) to increase infill and reduce VMT by supporting the implementation of the SACOG Metropolitan Transportation Plan/Sustainable Communities Strategy.
	GHG-13-f	Share information regarding new Infill Fee requirements and infill supportive policy and code changes through public notices, the County website, and information sheets for developers.
<p>GHG-14: Increase Organic Waste Diversion and Landfill Gas Capture Increase diversion of organic waste deposited into landfills from both commercial and residential sources to achieve a 75% diversion rate in countywide organic waste by 2030, 90% by 2045, and increase landfill gas capture at County-owned landfills.</p>	GHG-14-a	Conduct a regional organics capacity planning study to better understand the future needs of composting facility capacity and identify opportunities for expansion of regional compost capacity.
	GHG-14-b	Amend the Zoning Code to clarify and streamline the permitting process for the construction and operation of composting facilities within the unincorporated county.
	GHG-14-c	Continue to implement and enforce organics diversion ordinances associated with SB 1383 (enacted in 2016) by working with the County's franchised commercial haulers to ensure all customers are subscribed to the appropriate level of service and that audits are completed and enforced on the appropriate schedule.

Measure	Action ID	CAP Action Description
	GHG-14-d	Provide Backyard Composting Program information flyers, and include information about the program in County emails or social media communications at least twice per year, with the following information for increasing participation in the Backyard Composting Program: <ul style="list-style-type: none"> • How to start a compost bin. • What materials to add. • How to maintain your compost. • Benefits of using compost in garden for soil and garden health.
	GHG-14-e	Continue to host workshops at least once every year and host educational materials on the County's website to raise awareness on the type of waste that can go in garbage carts, organics carts, and recyclable carts with an aim to increase the diversion of organic waste. Also, provide information to commercial waste generators on how to comply with SB 1383 requirements.
	GHG-14-f	Partner with county school districts to educate students about: <ul style="list-style-type: none"> • sustainable behaviors, • waste types, • how to dispose of waste in appropriate containers, and • how to compost at home.
	GHG-14-g	Continue collaborating with local Sacramento food banks to continue food recovery services and educate residents and food-generating businesses about the requirements, local food banks, and food protection. Maintain a list of food recovery organizations in Sacramento County on the County's website.
	GHG-14-h	Apply for available grants to further education and implementation of organics diversion.
	GHG-14-i	Conduct a waste characterization study every five years to determine the materials comprising the unincorporated county's waste stream, the amount of organic waste sent to landfills, and the amount of organic waste diverted from landfills.
	GHG-14-j	Annually collect organics diversion tonnage and landfilled waste tonnage from waste haulers operating within the unincorporated County to track organics diversion rates over time.
	GHG-14-k	Perform an engineering study to determine the feasibility and cost of increasing LFG capture at County-owned landfills.

Measure	Action ID	CAP Action Description
	GHG-14-l	Extend financial and regulatory support to food recovery banks and organizations that deliver food to the elderly, disabled, or others who are unable to leave home. Reassess the efficiency of support provided every five years.
GHG-15: Implement the South Sacramento Habitat Conservation Plan Implement the South Sacramento Habitat Conservation Plan (SSHCP).	GHG-15-a	Continue implementation of the SSHCP to protect and enhance wetlands (primarily vernal pools), upland habitats, and agricultural lands within the conservation area.
	GHG-15-b	Perform a carbon sequestration capacity analysis to understand the baseline carbon storage and sinks associated with lands covered under the SSHCP, and how preservation, restoration, and management activities under the implementation of the SSHCP may act to increase carbon sequestration potential in these lands. The analysis should also identify data that can be collected from the South Sacramento Conservation Agency annual implementation reports to calculate the carbon sequestration potential of SSHCP implementation activities for countywide GHG inventory updates.
	GHG-15-c	Coordinate with the South Sacramento Conservation Agency to annually track the acres of lands conserved under the implementation of the SSHCP. Also, collect data to calculate additional carbon sequestration potential associated with activities performed each year for inclusion in GHG inventory updates, after a carbon sequestration capacity analysis has been completed.
GHG-16: Expand the Use of Zero-Emission Construction and Agricultural Equipment Encourage adoption of zero-emission construction and agricultural equipment through incentives and outreach efforts.	GHG-16-a	Incorporate use of zero-emission construction and portable equipment in the County's bid evaluation process for capital improvement projects, providing preference to contractors that use electric-powered equipment.
	GHG-16-b	Provide information about available incentives for zero-emission construction and portable equipment to contracts at the building permit counter through informational brochures, such as California Air Resources Board's (CARB's) Clean Off-Road Equipment Vouchers and Carl Moyer program .
	GHG-16-c	Include a list of available incentives to support the purchase of zero-emission agricultural equipment on the County Agricultural Commissioner's website, such as CARB's FARMER program , Clean Off-Road Equipment Vouchers , Carl Moyer program and SMAQMD's Commercial Lawn and Garden Program . Annually update the list of incentives and share it with the Sacramento County Farm Bureau.
	GHG-16-d	Develop and adopt an ordinance requiring that all discretionary projects use electric-powered or zero-emission construction equipment starting in 2035.
	GHG-16-e	Require that all projects implement SMAQMD Basic Construction Emission Control Practices (Best Management Practices) for reducing construction emissions as part of project conditions of approval.

Measure	Action ID	CAP Action Description
<p>GOV-01: Reduce Employee Commute VMT</p> <p>Expand the County of Sacramento Employee Transportation Program to reduce employee commute VMT to 4% below 2021 levels on a per employee basis (e.g., commute VMT per employee).</p>	GOV-01-a	<p>Conduct an employee commute survey every two years to understand current modes of commute, measure employee commute VMT, primary travel mode, and fuel type. The aim of the survey would be:</p> <ul style="list-style-type: none"> • to adjust Employee Transportation Program targets and requirements prioritizing the reduction of fossil-fuel-based VMT; • to assess of the effectiveness of County incentives, policies, and TDM measures (e.g., bike facilities, carpools, first mile/last mile connections, guaranteed ride home); • to understand and remove barriers for using/accessing any programs; and • to understand the need for strengthening EV infrastructure and policies at County buildings and facilities.
	GOV-01-b	Continue to offer a work-from-home policy that allows up to 2 days work-from-home per week that is available to full-time, non-essential County employees.
	GOV-01-c	Prepare promotional materials to inform and encourage employee participation in regional and national bike-to-work days/months.
	GOV-01-d	<p>Conduct an EV infrastructure planning analysis every five years to assess:</p> <ul style="list-style-type: none"> • priority locations for EV chargers at County buildings and facilities, • the need for installing additional EV chargers, • policy updates for employees' personal vehicle charging, and • signage updates.
	GOV-01-e	Prepare educational materials to inform, promote, and encourage County employees to use incentives for purchasing ZEVs, such as the State of California Green Fleet Employee Pricing Program and federal tax credits.
	GOV-01-f	Install signage to establish priority parking spaces for employee carpools.
	GOV-01-g	Maintain the County's membership in the 50 Corridor Transportation Management Association (TMA)/Sacramento TMA such that employees are provided TMA services such as guaranteed ride home and first mile/last mile connections.
	GOV-01-h	Increase the monthly subsidy of the Transit Subsidy Program to cover the cost of a monthly pass, and regularly review subsidy offerings to align with local monthly transit pass prices.
	GOV-01-i	Assign a staff position to manage the County of Sacramento Employee Transportation Program and 50 Corridor TMA/Sacramento TMA services.

Measure	Action ID	CAP Action Description
	GOV-01-j	Create an incentive program (e.g., gift vouchers, free lunch, raffles, contests) for employees who use commute modes other than single-occupancy vehicles regularly.
	GOV-01-k	Based on employee commute survey results, install both short-term and long-term bicycle parking in convenient and secure locations at all County buildings and where bicycle parking currently does not exist, to better encourage commuting via bicycle.
	GOV-01-l	Based on employee commute survey results, conduct an employee shuttle feasibility study to determine the feasibility and cost of a shuttle system that would bring employees from major transit stations to County work sites. As part of the feasibility study, identify appropriate partnerships and contracting options for a shuttle service operator.
	GOV-01-m	Based on employee commute survey results, establish a ZEV shuttle service for County employees, at no cost to employees, from major transit stations and with the appropriate service provider identified through the employee shuttle feasibility study.
GOV-02: Develop a Non-Airport Fleet Conversion Program Expand the County's Fleet Conversion Program to convert 35% of the County's on-road and offroad non-airport vehicle fleet to zero-emission technology by 2030 and 100% by 2045.	GOV-02-a	Update the County's fleet acquisition policies for vehicles with a gross vehicle weight rating (GVWR) greater than 8,500 pounds to meet or exceed the requirements of the California Advanced Clean Fleets Regulation.
	GOV-02-b	Update the County's light-duty (below 8,500 GVWR) fleet acquisition policies such that: <ul style="list-style-type: none"> • All new vehicle purchases and leases are ZEVs. • Exceptions may be granted for emergency vehicles and other unique duty circumstances with the approval of the County Executive or designee.
	GOV-02-c	Update the County's off-road equipment acquisition policies such that: <ul style="list-style-type: none"> • All new equipment purchases and leases are battery electric or other zero-emission technology. • Exceptions may be granted for emergency equipment, equipment types that are not available at the time of procurement, or other unique duty circumstances with the approval of the County Executive or designee.
	GOV-02-d	Adopt a policy to allow employees to be reimbursed for charging County-owned or -leased vehicles overnight at home, similar to how gasoline purchases are reimbursed.
	GOV-02-e	Continue to fuel applicable diesel- and compressed-natural-gas-powered vehicles with renewable fuels as the County transitions to ZEVs.

Measure	Action ID	CAP Action Description
	GOV-02-f	Prepare a Zero-Emission Fleet Transition Plan that includes: <ul style="list-style-type: none"> • an inventory of the County's existing on- and offroad fleet, • an assessment of the expected retirement/replacement timeline of each vehicle/equipment and identify appropriate replacement options, • an analysis of the additional ZEV fueling/charging infrastructure needs and the timeline to support the transition to ZEVs, • an assessment of the cost-effectiveness of various technology options considering up-front costs of vehicles/equipment and infrastructure and annual operating costs, and • identification of fleet maintenance staff training needs and any specialized equipment or facilities to support a ZEV fleet.
	GOV-02-g	Establish a County staff role to identify, monitor, and apply for grant funding opportunities, rebates, and incentives for fleet conversion to ZEVs and installation of infrastructure.
	GOV-02-h	Annually assess existing ZEV fueling capacity and the number of new ZEVs added to the fleet so that additional infrastructure needs can be incorporated into operating budgets in the following year. Also, report the number of ZEVs as a percentage of the total fleet to the County Sustainability Manager for annual progress reporting.
GOV-03: Develop an Airport Fleet Conversion Program Convert 35% of the SCAS fleet to zero-emission technology by 2030 and 100% by 2045.	GOV-03-a	Develop an Airport Fleet Conversion Program to achieve 35 percent conversion of the SCAS fleet to ZEVs by 2030 and 100 percent by 2045. The program will consist of the following: <ul style="list-style-type: none"> • Update the Sacramento International and Executive Airports fleet acquisition policies to require increased percentage of vehicles purchased or leased starting in 2025 to be powered by zero-emission vehicles and equipment available and practical at the time of purchase. • Develop an "Airport Fleet Transition Plan" to convert fossil-fuel-powered vehicle fleet to zero-emission vehicles and equipment including: <ul style="list-style-type: none"> • prioritization of fleet to be converted, • cost of conversion, • timeline, • funding and financing options, • conditions for exceptions for vehicles used in unique circumstances, and • Airport Executive's or designee's approval will be required for applying exceptions to vehicles.

Measure	Action ID	CAP Action Description
	GOV-03-b	Annually assess existing ZEV fueling capacity and number of new ZEVs added to fleet so that additional charging/fueling infrastructure needs can be incorporated into operating budgets in the following year. Also, report the number of ZEVs as a percentage of the total fleet to the County Sustainability Manager for annual progress reporting.
<p>GOV-04: Reduce Natural Gas Usage in County Buildings</p> <p>Develop a County Buildings and Facilities Decarbonization Plan by 2026 and reduce natural gas use in County buildings 30% below 2021 levels by 2030 and 85% below 2021 levels by 2045.</p>	GOV-04-a	<p>Conduct an electrification, energy efficiency, solar PV, and battery storage opportunities assessment, which will:</p> <ul style="list-style-type: none"> • inventory existing county buildings and facilities and the associated energy end uses; • identify potential solar pv and battery storage installation locations and capacity potential ; • identify energy efficiency, electrification and solar PV/battery storage projects that achieve full building/facility electrification; • identify alternative technology/fuel options (e.g., hydrogen fuel) for hard-to-electrify end uses (e.g., high heat processes); • identify funding and financing mechanisms to support individual projects; • calculate up-front costs and long-term costs/savings for individual projects; • account for increased building energy load and EV charging demand based on fleet electrification studies in Actions GOV-02-f and GOV-03-b; and • prepare an Energy Management Plan for SCAS facilities to develop a base case energy usage projection for the next ten years (2024-2034). A desktop engineering review will be conducted to identify projects to reduce energy consumption and peak energy demand.
	GOV-04-b	Based on the results of the electrification, energy efficiency, solar PV, and battery storage opportunities assessment, develop and implement a Buildings and Facilities Decarbonization Plan and include projects in the County's Capital Improvements Pla n.
	GOV-04-c	Adopt an electric building policy that requires all newly constructed County buildings to include no natural gas infrastructure, with limited exceptions for cases where emergency power needs cannot be sufficiently met with battery storage. For equipment that cannot be electrified with current available technology (e.g., high-heat processes), should first identify technological alternatives to natural gas combustions and provide evidence for infeasibility.
	GOV-04-d	Annually engage with SMUD to assess options for the electrification of space and water heating in County buildings.

Measure	Action ID	CAP Action Description
<p>GOV-05: Improve Water Efficiency</p> <p>Improve water efficiency at County buildings, facilities, and landscaped areas to reduce water consumption by 11% in 2030 and 29% in 2045 below 2021 levels.</p>	GOV-05-a	<p>Develop and adopt a County Buildings and Facilities Water Efficiency Plan to achieve a goal of 11 percent reduction in potable water usage below 2021 levels for all County buildings by 2030 and 29 percent by 2045. The plan should include:</p> <ul style="list-style-type: none"> • a review of County building and facility water consumption, • water efficiency upgrade opportunities, and • a cost and timeline for performing upgrades.
	GOV-05-b	Continue to replace water fixtures with low-flow equivalents to have all County buildings and facilities using low-flow equipment by 2030.
	GOV-05-c	Continue to use recycled water for landscaping as per the General Waste Discharge Requirements for Landscaping Irrigation Uses of Municipal Recycled Water (SWRCB Order no. 2009-0006-DWQ).
	GOV-05-d	<p>Conduct a landscape conditions and irrigation audit to evaluate irrigation practices around County facilities to:</p> <ul style="list-style-type: none"> • Identify essential and non-essential / non-functional turf. • Remove non-essential turf by 2027 and replace it with native and drought-tolerant species, consistent with AB 1572 requirements for removing non-functional turf. • Modify irrigation practices and equipment accordingly for essential turf (e.g., timers, sprinkler heads). • Evaluate necessary changes in irrigation practices for dry years to ensure tree survival.
	GOV-05-e	Create drought-tolerant demonstration projects with interpretive signs at the three most visited County buildings to exhibit and promote native vegetation and high-efficiency irrigation techniques.
<p>GOV-06: Replace Outdoor Lights with LEDs</p> <p>Replace all 2,200 remaining high-pressure sodium County-managed streetlights with LEDs by 2030, and all remaining County-managed outdoor lighting with LEDs by 2045.</p>	GOV-06-a	Replace remaining 2,200 high-pressure sodium (HPS) and mercury-vapor (MV) streetlights with light-emitting diode (LED) technology.
	GOV-06-b	Perform an audit of existing outdoor County lighting, including all County-owned and -managed buildings, facilities, parks, and properties.
	GOV-06-c	Replace outdoor lighting with LED technology at all County-owned and -managed buildings, facilities, parks, and properties, where LED technology is not currently in place.

NOTES: 2022 ATP = 2022 Active Transportation Plan; AB = Assembly Bill; ADA = Americans with Disabilities Act; BPS = building performance standard; CALGreen Code = California Green Building Standards Code; Caltrans = California Department of Transportation; CAP = climate action plan; CARB = California Air Resources Board; County = Sacramento County; EJ = environmental justice; EV = electric vehicle; EVSE = electric vehicle supply equipment; FARMER = Funding Agricultural Replacement Measures for Emission Reductions; General Plan = *Sacramento County General Plan of 2005–2030*; GHG = greenhouse gas; GVWR = gross vehicle weight rating; HVAC = heating, ventilation, and air conditioning; I-5 = Interstate 5; ID = identification; LED = light-emitting diode; PV = photovoltaic; SACOG = Sacramento Area Council of Governments; SacRT = Sacramento Regional Transit; SB = Senate Bill; SCAS = Sacramento County Airport System; SHRA = Sacramento Housing and Redevelopment Agency; SMAQMD = Sacramento Metropolitan Air Quality Management District; SMUD = Sacramento Municipal Utility District; SSHCP = South Sacramento Habitat Conservation Plan; SWRCB = State Water Resources Control Board; TMA = Transportation Management Association; TSM = transportation system management; VMT = vehicle miles traveled; ZEV = zero-emission vehicle

Table 2-9: Proposed Climate Adaptation Measures and Actions

Measure	Action ID	Climate Adaptation Action Description
TEMP-01: Protect Critical Infrastructure Vulnerable to Extreme Heat Events	TEMP-01-a	In cases where existing communication, energy, public service, and transportation facilities and infrastructure are found to be vulnerable to extreme heat, bolster and/or upgrade associated infrastructure to be more resilient to periods of high heat (e.g., use of heat-tolerant materials).
TEMP-02: Partner with Local Agencies and Utilities on Heat-Related Climate Change Initiatives and Efforts	TEMP-02-a	Partner with SMAQMD, SMUD, PG&E, and SACOG to implement future and ongoing heat-related climate change initiatives. Such partnerships could include helping other organizations increase participation in existing programs through education and promotion, and using and integrating them in County programs and activities, where feasible. Examples include but are not limited to participation in SMAQMD's Regional Urban Heat Island Initiative, the Sacramento Tree Foundation's Shade Tree and NeighborWoods programs, PG&E's Energy Efficient Cool Roof program, and SACOG's Complete Streets GHG reduction measures.
TEMP-03: Expand Services and Raise Awareness of Heat-Related Risks and Illnesses for Residents of Environmental Justice (EJ) Communities	TEMP-03-a	Through the County Department of Health Services, track heat-related illness, hospitalizations, and deaths to target education and outreach efforts.
	TEMP-03-b	Expand partnerships with local governments, nongovernmental organizations, churches, and businesses to provide additional cooling centers within EJ communities, where residents may not have access to air conditioning during periods of extreme heat.
	TEMP-03-c	Survey EJ communities to identify community preferences regarding the appropriate location and accessibility of cooling centers, based on proximity to public transit.
TEMP-04: Encourage the Installation or Use of Cool-Roof Technologies, Passive Solar Home Design, Green Roofs, and Rooftop Gardens	TEMP-04-a	Develop incentive programs including but not limited to permit streamlining, permit fee reductions, or tax rebates for developers and landowners to apply passive solar home design to future residential buildings. A home that employs passive solar home design has windows oriented toward the south, is composed of materials of high heat absorption, and is built to distribute heat and cold air throughout the home. Use of these design elements provides natural cooling and heating and reduces energy demand.
	TEMP-04-b	Develop incentive programs including but not limited to permit streamlining, permit fee reductions, and tax rebates to encourage the use of rooftop gardens and green roofs in residential and commercial buildings. Rooftop gardens are gardens on rooftops, while green roofs (or living roofs) are rooftops that are partially or completely covered by vegetation. These forms of roofing lower the amount of heat absorbed by a building and reduce energy demand associated with air conditioning.

Measure	Action ID	Climate Adaptation Action Description
TEMP-05: Increase Participation in the Sacramento Area Sustainable Business Program	TEMP-05-a	Increase funding and staff resources for the Sacramento Area Sustainable Business Program through the County's Business Environmental Resource Center, with the goal of increasing overall participation and certification in the program and implementing annual monitoring of businesses that adopt practices to reduce energy consumption and promote energy efficiency, along with other sustainability measures.
TEMP-06: Partner with Valley Vision to Expand the Business Resiliency Initiative	TEMP-06-a	Partner with Valley Vision to train businesses to use the Business Resiliency Initiative toolkit, which will prepare business for weather-related risks to daily operations. Aspects of the Business Resiliency Initiative toolkit include the following: <ul style="list-style-type: none"> • Preparation of a hazard vulnerability assessment, which identifies the greatest risks and hazards facing individual businesses. • Review of existing resiliency. • Development of a business continuity plan. • Testing of business continuity plans through drills and exercises. • Engagement in community outreach.
TEMP-07: Use Cool Pavement Technology and Reduce the Amount of Paved Surfaces	TEMP-07-a	Require the use of cool pavement technology in both the replacement and the construction of new roads, sidewalks, parking areas, and bikeways.
	TEMP-07-b	Develop and incorporate cool pavement standards into the County's roadway design manual for use in public rights-of-way.
	TEMP-07-c	Develop and incorporate cool pavement standards into the County's development standards for private development projects, in both new construction and changes to existing on-site paved surface areas (e.g., parking lots, private roadways, or other hardscape areas).
	TEMP-07-d	Apply cool pavement standards when constructing new County-owned facilities or modifying existing County-owned facilities.
	TEMP-07-e	Collaborate with the Capital Region Climate Readiness Collaborative, the California Environmental Protection Agency, the UC Davis Cool Pavement Research Center, and other regional partners to obtain guidance, explore pilot projects, or obtain other technical support. (Note: This action could also be achieved collaboratively with others as part of the regional urban heat island initiative described in Action TEMP-02-a.)

Measure	Action ID	Climate Adaptation Action Description
TEMP-08: Increase Parking Lot Shading, Landscaping, and Urban Greening, Prioritizing EJ Communities	TEMP-08-a	Enforce the existing parking lot shading coverage requirements (i.e., 30 percent coverage for five to 24 parking spaces, 40 percent coverage for 25–29 parking spaces, and 50 percent coverage for 50+ parking spaces) for new development projects that include parking, and revise parking lot shading standards to provide larger minimum sizes for tree planters to improve tree health.
	TEMP-08-b	Enforce existing standards for tree shading and landscaping in existing parking lots not in compliance and establish a compliance program to ensure that trees are maintained properly.
	TEMP-08-c	Establish rebate programs, permit fee reductions, or tax deductions to incentivize the installation of solar PV carports in existing and future parking lots. Solar PV carports provide shade in parking lots while simultaneously converting solar energy into electricity that can be used to charge EVs and plug-in hybrid vehicles.
	TEMP-08-d	Establish rebate programs, permit fee reductions, or tax deductions to incentivize the installation of solar PV carports in existing and future parking lots. Solar PV carports provide shade in parking lots while simultaneously converting solar energy into electricity that can be used to charge EVs and plug-in hybrid vehicles.
	TEMP-08-e	Develop standards for the inclusion of solar PV carports in County-owned parking lots.
	TEMP-08-f	Collaborate with the Capital Region Climate Readiness Collaborative, the Sacramento Tree Foundation, SMUD, PG&E, or other regional partners to identify incentives, grants, or other resources for the purposes of commercial and residential greening actions including but not limited to planting of parking lot or street trees, maintaining tree health, and establishing community gardens.
TEMP-09: Understand the Tolerance of Current Crop Mixes to Withstand Increased Temperatures	TEMP-09-a	Actively engage with the agricultural sector to understand the tolerance of current crop mixes to withstand increased temperatures, disease, and pests, and explore options to diversify and shift to drought-tolerant crops that can be cultivated in a warmer environment.
TEMP-10: Work with SMUD to Improve Electric Grid Reliability	TEMP-10-a	Work with SMUD to improve the reliability of the electric grid so that the electricity needs of customers can be met at all times, given that more frequent extreme-heat events will lead to higher power and electricity usage, especially during peak hours.
	TEMP-10-b	Work with SMUD to design or use existing grid resilience/reliability metrics (e.g., attribute-based and performance-based metrics) to track the progress made on grid reliability improvements.

Measure	Action ID	Climate Adaptation Action Description
FIRE-01: Map and Identify Locations that Are Newly at Risk, or at Higher Risk for Fire Hazards	FIRE-01-a	Work with CAL FIRE, Metro Fire, and any other fire department operating within the boundaries of the unincorporated county to map and identify locations within the county that are newly at risk, or at higher risk, for wildfire hazards because of climate change and its impacts. Wildfire hazards may include direct damage to the American River Parkway, structures, and electrical transmission, transportation, and communication infrastructure; increased rates of erosion, landslide, and water quality degradation; and ecological disturbance.
FIRE-02: Coordinate with State and Local Agencies to Establish Ecological Recovery Programs	FIRE-02-a	Coordinate with CAL FIRE, Metro Fire, resource conservation districts, land trusts, or other similar organizations to establish ecological recovery programs to support post-fire restoration efforts.
FIRE-03: Transition County Tree Planting to More Fire-Resilient Species	FIRE-03-a	Consult with the Sacramento Tree Foundation and SelecTree to identify wildfire-resistant species and the appropriate species of trees for fire hazard severity zones. Incorporate such recommendations into updates to landscaping standards and tree planting guidelines in the County Code or other appropriate documents.
FIRE-04: Coordinate and Improve Emergency Preparedness Systems	FIRE-04-a	Coordinate with Metro Fire, CAL FIRE, Cal OES, and the City of Sacramento Fire Department to identify strategies to ensure capacity and resilience of routes potentially compromised by wildfire, including emergency evacuation and supply transportation routes.
	FIRE-04-b	Improve upon education and outreach regarding emergency supplies, evacuation routes, pet protection, and key terminology (e.g., controlled/prescribed burn, fuel load), and frequently update the Sacramento Ready webpage to include current information.
	FIRE-04-c	Provide input to Metro Fire and CAL FIRE to establish reliable wildfire monitoring systems that provide early warning of high wildfire risk and wildfire occurrence and include evaluation of the ecological and human impacts of wildfire.
	FIRE-04-d	Collaborate with SMAQMD to enhance public information campaigns on preparing for wildfire smoke and dealing with poor and life-threatening air quality situations. Special focus should be placed on EJ communities and sensitive populations, such as those with existing respiratory diseases.
FIRE-05: Avoid New Development in Very-High Fire Hazard Severity Zones	FIRE-05-a	Avoid new development in Very-High Fire Hazard Severity Zones according to the most recent and available CAL FIRE Hazard Severity Zones maps and consider projections of future climate change when planning future land uses.

Measure	Action ID	Climate Adaptation Action Description
FIRE-06: Collaborate with Agencies and Organizations on Programs to Reduce Wildfire Hazards	FIRE-06-a	Collaborate with Metro Fire and other Sacramento County–based fire districts to continue to reduce wildfire hazards, including but not limited to enforcing defensible space guidelines for existing and new development, restoring wildfire-resilient conditions by thinning and removing live or dead vegetation, implementing wildfire fuel reduction action plans, and retaining healthy native trees.
	FIRE-06-b	Collaborate with the U.S. Bureau of Land Management, U.S. Fish and Wildlife Service, Capital Region Climate Readiness Collaborative, American River Parkway Foundation, Sacramento River Watershed Program, and other local stakeholders in developing resource management plans for the Sacramento, Cosumnes, and American rivers.
WATER-01: Evaluate Vulnerabilities of Water Supply Systems and Networks and Develop Strategies to Improve Resilience	WATER-01-a	Establish a schedule to routinely evaluate the vulnerability of the water supply systems and networks to climate change–related impacts and develop strategies to add resilience to these systems. Resilient water supply systems must be able to deliver services during disruptive events (e.g., storms, drought).
	WATER-01-b	Adopt municipal codes to enforce standards of resiliency for water-related infrastructure for all future development. Municipal codes may include but are not limited to standards related to elevation of electrical generators and/or tanks and containers of hazardous materials, increased capacity of water storage tanks, and improved deployment of backflow preventers to impede contamination of drinking water after an extreme-weather event (e.g., storm).
	WATER-01-c	Continue to participate in and support the efforts of the Sacramento Water Forum to promote comprehensive and effective water management and support aquatic ecosystem protection in the Lower American River.
	WATER-01-d	Collaborate with experts and other agencies to identify potential hazards (e.g., floods, drought) at sites of new infrastructure, assess the vulnerabilities associated with the identified hazards, and use appropriate materials and establish adequate capacities for new infrastructure.
	WATER-01-e	Support the projects of the Sacramento River Watershed Program aimed to improve water quality, streamflow, flood management, and watershed stewardship in the Sacramento River and Lower American River watersheds.
	WATER-01-f	Conduct ongoing maintenance of existing water supply–related infrastructure to identify potential weaknesses and deterioration.

Measure	Action ID	Climate Adaptation Action Description
WATER-02: Increase Onsite Greywater and Rainwater Reuse, Stormwater Reuse, and Recycled Water Systems	WATER-02-a	Partner with the Regional Water Authority and other water districts to establish incentive programs that promote the deployment of on-site rainwater catchment systems, such as rain barrels, rain gardens, cisterns, and other mechanisms, to capture and store rainwater for use during the dry season for water customers.
	WATER-02-b	Continue and expand on the County's education and outreach regarding the safe and proper installation of rainwater catchment and storage systems.
	WATER-02-c	Coordinate with appropriate agencies to develop a standard to deploy innovative options to meet future water demand for all County-owned facilities (e.g., reclaim and purify wastewater, employ on-site greywater reuse systems, or use recycled water from the regional or local treatment plants).
	WATER-02-d	Develop an integrated network of rainwater and greywater catchment systems within the county's agricultural sector through incentive and rebate programs to further increase water storage capacity.
	WATER-02-e	Establish a regional stormwater harvest program and construct the related infrastructure (e.g., piping, storage basins and reservoirs, pumps) in existing rural and urban portions of the unincorporated county and in new development.
WATER-03: Create Incentives and Programs to Transfer Knowledge and Technologies to Assist Farmers with New Production Methods and Drought-Tolerant Varieties	WATER-03-a	Create programs that facilitate communication between farmers of specialty and climate-sensitive crops and agricultural specialists to advise future agricultural practices in light of a hotter and potentially drier climate.
	WATER-03-b	Provide financial support to farmers of specialty and climate-sensitive crops for changes to irrigation systems associated with drought-tolerant crops, which may be cultivated more under future climate conditions.
	WATER-03-c	Incentivize water conservation and efficiency in the agricultural sector through incentive and rebate programs to support climate-smart agricultural practices that include but are not limited to drip irrigation, tailwater return systems, covered canals, reduced tillage, and covered crops.
WATER-04: Reduce Potable Water Use in Outdoor Landscaping	WATER-04-a	Amend the Sacramento County Water Efficient Landscaping Ordinance to require that 80 percent of landscaping area be dedicated to low-water, drought-tolerant species for new residential and nonresidential buildings.
	WATER-04-b	Partner with the Regional Water Authority and other water districts in the county to improve existing rebate programs (e.g., Sacramento County Water Agency's Cash for Grass Program) to incentivize the incorporation of low-water, drought-tolerant species in lieu of water-intensive lawns and high-water vegetation in existing residential areas.
	WATER-04-c	Partner with the Sacramento Area Sewer District to expand the existing recycled-water-system service areas.

Measure	Action ID	Climate Adaptation Action Description
WATER-05: Expand Upon Existing Water Conservation Education Outreach Programs for Residents and Businesses	WATER-05-a	Expand communication of water conservation–related education and tips through multiple media platforms (e.g., radio, television, social media) to increase awareness of indoor and outdoor conservation methods. Showcase a drought-tolerant demonstration garden at a County building.
WATER-06: Collaborate with Federal, State, and Local Agencies and Organizations to Identify Future Water Supplies, Explore Alternative Supply Sources, and Improve Capacity	WATER-06-a	Pursue grant funding opportunities from the State Water Resources Control Board, DWR, the U.S. Bureau of Reclamation, the U.S. Army Corps of Engineers, and other agencies related to water recycling projects, and/or other water resource planning projects.
	WATER-06-b	Engage with the Regional Water Authority, other water districts in the county, the State Water Resources Control Board, DWR, the U.S. Bureau of Reclamation, the U.S. Army Corps of Engineers, and other agencies to identify water supply options for the future and collaborate on water conservation strategies to improve supply capacity throughout the Sacramento and American River watersheds.
	WATER-06-c	Collaborate with the Sierra Climate Adaptation and Mitigation Partnership, the Sierra Nature Conservancy, the Sacramento Water Forum, the Capital Region Climate Readiness Collaborative, and other organizations to explore regional sustainability and conservation strategies for Sacramento County’s water resources (i.e., the Sacramento, American, Mokelumne, and Cosumnes rivers and groundwater).
	WATER-06-d	Invest in programs within Sacramento County and/or locations within or near the Sacramento Valley Groundwater Basin to artificially recharge groundwater supplies through recharge ponds and injection wells to improve Sacramento County’s water storage capacity.
FLOOD-01: Evaluate and Improve Capacity of Stormwater Infrastructure for High-Intensity Rainfall Events	FLOOD-01-a	Invest in green infrastructure such as rain gardens, bioswales, stormwater tree trenches, green roofs, detention basins, and rain barrels to reduce peak runoff, filter stormwater, and increase groundwater recharge.
	FLOOD-01-b	Increase maintenance and cleaning of gutters, drainage ditches, and culverts to maximize drainage capacity.
FLOOD-02: Improve Sewage and Solid-Waste Management Infrastructure	FLOOD-02-a	Track the efforts of sanitation districts and waste management agencies in the region with the improvement of sewage and solid-waste management infrastructure. Participate in interagency coordination meetings where applicable to identify opportunities for the County to support such efforts.

Measure	Action ID	Climate Adaptation Action Description
FLOOD-03: Identify New Locations for Flood Control, Prioritizing Green Infrastructure Solutions	FLOOD-03-a	Identify new locations suitable for multi-benefit flood control (e.g., underused agricultural areas, small streams) that encourage groundwater recharge, aquaculture, and habitat restoration (e.g., wetlands).
FLOOD-04: Coordinate with Federal, State, and Local Agencies to Improve Emergency Evacuation and Supply Transportation Routes	FLOOD-04-a	Coordinate with the City of Sacramento, Cal OES, SAFCA, DWR, and FEMA in improving emergency evacuation and supply transportation routes during flood events.
	FLOOD-04-b	Identify locations of limited evacuation and supply transport capacity (e.g., bridges) and explore innovative alternative routes (e.g., American River bike trails, light rail).
FLOOD-05: Invest in Use of Pervious Pavements and Landscaping in Developed Areas and Restrict the Use of Paved Surfaces	FLOOD-05-a	Increase the use of pervious pavements and landscaped areas to allow for better infiltration and reduce stormwater overflow in developed areas.
	FLOOD-05-b	Minimize paved surfaces for parking in favor of pervious surfaces to mitigate high volumes of stormwater runoff. The County will consider reducing minimum parking requirements in appropriate land use designations and/or increasing minimum tree or landscaping planter sizes.
FLOOD-06: Map Critical Facilities and Infrastructure Locations Vulnerable to Flooding and Upgrade and/or Relocate Infrastructure Where Applicable	FLOOD-06-a	Map locations of communication, energy, public service, and transportation facilities and infrastructure that are vulnerable to flooding.
	FLOOD-06-b	In cases where existing communication, energy, public service, and transportation infrastructure and facilities are found to be vulnerable to flooding, assess and upgrade associated infrastructure to be more resilient to inundation and/or relocate critical infrastructure and related elements to higher ground (e.g., generators relocated to upper floors of hospitals).
FLOOD-07: Establish an Underground Utilities Program Resistant to Flooding	FLOOD-07-a	Partner with SMUD and PG&E to establish a flood-resistant underground utilities program that would underground overhead utility lines in appropriate areas to increase the resiliency of the electric grid.
FLOOD-08: Partner with SAFCA and Local Agencies, Utilities, and Other Organizations to Support Future and Ongoing Flood-Related Climate Change Initiatives	FLOOD-08-a	Partner with SAFCA, SMUD, PG&E, the Capital Region Climate Readiness Collaborative, the Sierra Climate Adaptation and Mitigation Partnership, and others to support future and ongoing flood-related climate change initiatives such as SMUD's Sacramento Resilient Grid Initiative, Flood Data Analysis and Preparedness Planning, and other initiatives designed to increase Sacramento County's resilience to flooding.
	FLOOD-08-b	Partner with SAFCA, SMUD, PG&E, the Capital Region Climate Readiness Collaborative, the Sierra Climate Adaptation and Mitigation Partnership, and others in advancing upstream and downstream regional water management solutions that reduce flood risks by increasing storage capacity in upstream reservoirs (similar to improvements recently made to Folsom Dam), storing and slowing snowmelt until later in the season, and increasing the capacity of the Yolo Bypass.

Measure	Action ID	Climate Adaptation Action Description
	FLOOD-08-c	Advance projects to stabilize and reinforce shorelines and levees along the American River to accommodate necessary high flows during high-release flood protection events.
FLOOD-09: Research the Tolerance of Current Crop Mixes to Withstand Increased Flooding and Support Aquaculture and Fish Habitat	FLOOD-09-a	Work with the agricultural sector to understand the tolerance of current crop mixes to withstand increased flooding and explore options to shift crop types to suit changing conditions.
	FLOOD-09-b	Support the efforts of California Trout's Nigiri Project and other similar projects to incentivize farmers to manage fields for fish habitat and aquatic food production (e.g., rice).
	FLOOD-09-c	Coordinate with the U.S. Department of Agriculture, the California Department of Food and Agriculture, DWR, the Sacramento County Department of Water Resources, California Trout, the California Department of Fish and Wildlife, and others to identify and implement actions local farmers can take to anticipate increased flooding.
FLOOD-10: Expand Educational Programs to Address Vector and Waterborne Diseases	FLOOD-10-a	Coordinate with the Sacramento-Yolo Mosquito and Vector Control District in the design and installation of underground cisterns and other drainage facilities to reduce and treat vectors.
	FLOOD-10-b	Expand public outreach and education through multiple forms of media (e.g., radio, television, social media) to reduce standing water in areas that attract mosquitoes. Include information regarding methods of protection (e.g., covering up, use of sprays).
FLOOD-11: Identify Concrete Channel Restoration Areas	FLOOD-11-a	Identify and naturalize concrete channels along creeks and river corridors where appropriate by stabilizing stream banks and planting appropriate vegetation to buffer buildings, roads, and crops from flooding similar to the Cordova Creek Naturalization Project.
FLOOD-12: Replant Bare or Disturbed Areas	FLOOD-12-a	Replant bare or disturbed areas to reduce runoff, improve water uptake, and reduce erosion and sedimentation in streams.
FLOOD-13: Update and Implement the County's Local Hazard Mitigation Plan to Address Climate Change-Related Flooding Impacts	FLOOD-13-a	Ensure that all future updates to the County's LHMP incorporate comprehensive strategies to address the increasing likelihood of flooding as a result of the hazards of climate change.
	FLOOD-13-b	Pursue the implementation of plans related to flood protection and continue to secure grant funding to prepare future updates, where applicable.
FLOOD-14: Safeguard Freshwater Supply Against Contamination, Degradation, or Loss	FLOOD-14-a	Invest in new and/or upgraded existing infrastructure to ensure that freshwater supplies are not contaminated, degraded, or lost during flood events.

Measure	Action ID	Climate Adaptation Action Description
SLR-01: Coordinate with Other Agencies on Floodplain Mapping Updates and Identification of Improvements to Protect Vulnerable Populations, Functions, and Structures	SLR-01-a	Coordinate with the applicable reclamation districts, FEMA, and DWR to regularly update floodplain mapping for potentially affected areas to reflect changes in base flood elevations that account for sea level rise.
	SLR-01-b	Partner with the applicable reclamation districts to establish measures to protect populations, functions, and structures within the affected areas, including continued maintenance of reclamation district levee systems and relocation of vulnerable communities, infrastructure, and facilities where applicable. Partner with community-based organizations serving vulnerable communities in all aspects of the planning process.
SLR-02: Support and Monitor Ongoing Analysis of Sea Level Rise Data	SLR-02-a	Support and monitor ongoing collection and analysis of sea level rise, storm surge, and tidal data by existing institutions, including but not limited to FEMA, the National Oceanic and Atmospheric Administration, and the California Coastal Commission.
	SLR-02-b	Support research and analysis of saltwater intrusion and degraded water quality in the Sacramento River, as well as surrounding freshwater inlets and wells, as a result of sea level rise.
SLR-03: Update the County's Local Hazard Mitigation Plan to Incorporate Sea Level Rise	SLR-03-a	Require that future updates to the Sacramento County LHMP incorporate a comprehensive evaluation of sea level rise in the county and associated risk management processes as the degree of sea level rise manifests and more data become available.
SLR-04: Incorporate Sea Level Rise Effects into Capital Improvement Plans	SLR-04-a	Following the implementation of the actions contained in Measures SLR-01 and SLR-03, update capital improvement plans for critical infrastructure to address the effects of future sea level rise and associated hazards in potentially affected areas.
SLR-05: Guide Future Development Out of Areas Vulnerable to Sea Level Rise	SLR-05-a	Following implementation of the actions contained in Measures SLR-01 and SLR-03, guide future development out of areas that are vulnerable to sea level rise and associated hazards via zoning changes, transfer of development rights, or other mechanisms.
ALL-01: Create a Comprehensive Outreach Strategy	ALL-01-a	Develop robust multilingual education and outreach materials accessible across multiple media forms (e.g., radio, television, social media) to publicize potential real-time information about climate hazards (e.g., flood risk, extreme-heat risk). The materials could include how to sign up for the Sacramento Emergency Alerts Notification System; and information regarding emergency supplies, pet protection, electrical safety, locations of cooling centers, and evacuation route maps.
	ALL-01-b	Invest resources and personnel to regularly update the Sacramento Ready webpage to include current information.

Measure	Action ID	Climate Adaptation Action Description
ALL-02: Set Up Annual Progress Report/Check-In for All Applicable Measures	ALL-02-a	Set up annual progress report/check-in meetings with agencies, organizations, businesses, and others who are assigned to implement each adaptation measure. The assessment will include whether certain measures are completed, need to be revised, or are no longer applicable. The meetings can potentially be combined with annual LHMP check-in meetings, and/or held after a significant hazard event or a disaster declaration.
	ALL-02-b	Closely track the implementation of mitigation actions, which will further inform the implementation of adaptation strategies, or vice versa. Changes, completion, and deletion of certain mitigation actions could also lead to the alteration of adaptation measures.

NOTES: CAL FIRE = California Department of Forestry and Fire Protection; Cal OES = California Governor’s Office of Emergency Services; County = Sacramento County; DWR = California Department of Water Resources; EJ = environmental justice; EV = electric vehicle; FEMA = Federal Emergency Management Agency; GHG = greenhouse gas; ID = identification number; LHMP = Local Hazard Mitigation Plan; Metro Fire = Sacramento Metropolitan Fire District; PG&E = Pacific Gas and Electric Company; PV = photovoltaic; SACOG = Sacramento Area Council of Governments; SAFCA = Sacramento Area Flood Control Agency; SMAQMD = Sacramento Metropolitan Air Quality Management District; SMUD = Sacramento Municipal Utility District; UC Davis = University of California, Davis

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3 ALTERNATIVES

3.1 INTRODUCTION

CEQA requires a lead agency to analyze a reasonable range of alternatives to a proposed project that could feasibly attain most of the basic objectives of the project while substantially reducing or eliminating significant environmental impacts. CEQA also requires an EIR to evaluate a “no project” alternative to allow decision-makers to compare impacts of approving a project with the impacts of not approving it. See CEQA Guidelines Section 15126.6. This chapter describes the key considerations used to identify and screen potential alternatives, explains why some potential alternatives were eliminated from further consideration, and describes the alternatives that were carried forward for more detailed analysis.

This chapter also compares the environmental impacts of the project and alternatives evaluated in detail. This comparison is based on the analysis of environmental impacts of the project, provided in the resource-specific chapters that follow.

3.2 SCREENING CRITERIA FOR SELECTION OF ALTERNATIVES

Consistent with CEQA Guidelines Section 15126.6, the County screened potential alternatives and thereafter determined to carry some forward for more detailed consideration based on the following factors:

1. Whether the alternative would meet most of the basic project objectives. Chapter 2 identifies the project objectives listed below. Any alternative determined not to meet at least half of the enumerated objectives was not carried forward for more detailed review.
 - a. Objective 1: Implement GPU EIR Mitigation Measure CC-2 to prepare and adopt a CAP that will reduce greenhouse gas (GHG) impacts from implementation of the General Plan.
 - b. Objective 2: Respond to requests to prepare GHG forecasts that include reasonably foreseeable projects and population growth.
 - c. Objective 3: Identify GHG emission reduction targets tailored to the unincorporated county and the County’s government operations that align with State and County climate goals.
 - d. Objective 4: Establish GHG emissions reduction measures and actions to achieve the County’s GHG emissions reduction targets for communities in the unincorporated county and County operations.
 - e. Objective 5: Set a framework of sufficiently adaptable long-term strategies that will consider and incorporate, as appropriate, additional GHG

reduction strategies that embrace continued innovation, technological advances, and the creation of high-quality jobs in the county.

- f. Objective 6: Provide a mechanism for streamlining of project-level GHG emissions analysis consistent with Section 15183.5 of the CEQA Guidelines.
 - g. Objective 7: Develop climate adaptation strategies to guide the County to a more resilient future.
2. Whether the alternative would be potentially feasible, where *feasible* means capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors (Public Resources Code Section 21061.1; CEQA Guidelines Sections 15126.6 and 15364).¹ Any alternative determined to be infeasible was not carried forward for more detailed review.
 3. Whether implementation of the alternative is remote or speculative. For purposes of this analysis, *remote* means unlikely or having only a slight chance of occurring, and *speculative* means unsupported, theoretical, or based on conjecture or guesswork. Any potential alternative determined to be remote or speculative was not carried forward for more detailed review.

The County also screens potential CEQA alternatives consistent with CEQA Guidelines Section 15126.6 to determine whether the potential alternatives could avoid or substantially lessen any of the potentially significant impacts of a proposed project (i.e., the CAP). Generally, any alternative determined not to avoid or substantially lessen the significant impacts of a proposed project is not carried forward for more detailed review. However, as analyzed in Chapters 4 through 8, this project would cause no new significant impact and no substantial increase in the severity of a significant impact than was disclosed in the GPU EIR. Because the project would not cause a new significant impact or a substantial increase in the severity of a previously analyzed significant impact, no potential project alternative could meet this test. Accordingly, this aspect of the County's CEQA alternatives screening process does not distinguish amongst potential alternatives and so is not considered further in this chapter.

In addition to these screening criteria, the County considered other input received during the scoping period for the EIR as part of the alternatives development process, including multiple requests that the County consider a potential "smart growth" alternative at the intersection of land use and transportation that focuses on a combination of infill and mixed uses, reduced vehicle miles traveled (VMT), and increased reliance on public transit as a pathway to reduce overall GHG emissions.

¹ A sufficient demonstration of financial infeasibility requires more than a showing that the alternative would be more expensive or less profitable; it requires evidence that the additional costs or lost profitability are sufficiently severe as to render it impractical to proceed with the project. *Citizens of Goleta Valley* (1998) 197 Cal. App. 3d. 1167, 1181.

Informed by and in response to the scoping input received, this EIR initially considered seven potential alternatives: (1) smart growth alternatives, (2) alternative locations, (3) a prohibition (moratorium) on growth in unincorporated county areas, (4) a prohibition on changes to the General Plan Land Use Map, (5) communitywide carbon neutrality, (6) a carbon neutral development alternative, and (7) the CEQA-required no project alternative. For the reasons discussed below, the County carried forward for more detailed consideration the Carbon Neutral Development Alternative and the No Project Alternative.

3.3 ALTERNATIVES ELIMINATED FROM DETAILED CONSIDERATION

3.3.1 SMART GROWTH ALTERNATIVES

In response to community input received during the scoping process, the County investigated two separate smart growth alternative concepts to see whether either or both could pass the screening criteria established in CEQA Guidelines Section 15126.6 and enumerated above.² Both of the smart growth alternatives are intended to reduce GHG emissions associated with vehicle travel through reductions in VMT and were developed consistent with the appellate court's direction in recent decisions.

The two smart growth alternatives discussed below propose actions that, if adopted in addition to the CAP measures and actions, would further reduce GHG emissions primarily by substantially reducing VMT through changes in development patterns. Each of them would be implemented through incentives and disincentives for future development, which would result in VMT reductions from forecast growth. Substantial reductions in countywide VMT would require changes to the travel patterns of the existing population, which generate a larger share of forecast VMT, and Board of Supervisors-directed land use and zoning changes. For example, siting mixed-use development and neighborhood-serving retail near residential development can bring employment and shopping opportunities closer to existing residents, thus reducing regional VMT. Moving all household growth to specific areas along with changes to employment and commercial land uses in those areas could both minimize VMT from future growth and potentially reduce VMT associated with existing residents. Land use strategies that promote density and mixed-use development also make transit more effective.

In addition to reducing VMT and GHG emissions, adopting and implementing a smart growth alternative in the unincorporated area could result in development outcomes aligned with previously directed policy objectives, such as increasing housing diversity and affordability levels near jobs and transit and reducing sprawling land use patterns. The General Plan focuses on directing future development and investment toward

² "Smart Growth" is defined in the *Golden Door Properties, LLC v. County of San Diego* (2020) 50 Cal.App.5th 467 decision as "compact, efficient, and environmentally sensitive pattern of development that focuses future growth away from rural areas and closer to existing and planned job centers and public facilities, while preserving open space and making more efficient use of existing urban infrastructure."

previously urbanized communities. The General Plan provides three primary methods for urban growth: (1) buildout of infill sites (including targeted commercial corridors), (2) buildout of planned communities within the Urban Policy Area (UPA), and (3) new growth areas³. General Plan Policy LU-3 summarizes this methodology. General Plan Policy LU-68 grants explicit public funding priority to projects that reduce VMT. Prioritization of high-quality infill development supports Sacramento County's GHG reduction goals and implementation of the 2040 Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS). In addition, the County has worked on several other programs designed to encourage infill development. These programs have been completed or are in-progress, and include:

- Re-Envision West Arden Arcade Plan (Sacramento County 2022)
- Fair Oaks Boulevard Corridor Plan (Sacramento County 2011a)
- North Watt Avenue Corridor Plan (Sacramento County 2012)
- Fulton Avenue Special Planning Area (Sacramento County 2011b)
- Folsom Boulevard Complete Street Master Plan (Sacramento County DOT 2016)
- Watt Avenue Complete Streets Project (Sacramento County DOT 2021)
- Fair Oaks Boulevard Complete Street Master Plan (Sacramento County 2017)
- Arden Way Corridor (Sacramento County DOT 2024)

Other ongoing programs include the Stockton Boulevard Special Planning Area (SPA) Ordinance Update, Senate Bill (SB) 2 Permanent Local Housing Assistance and SB 2 Zoning Code Amendments,

- Sacramento County Regional Housing Needs Allocation (RHNA) Rezone Project, and the
- Sacramento County Infill Program.

In 2021, the California Department of Housing and Community Development awarded the County a Local Action Planning (LEAP) Grant for the preparation and adoption of planning documents and process improvements that accelerate housing production. One component of the LEAP Grant was to restart the County's Infill Program. Work includes developing priority infill areas and an inventory of sites, auditing regulations, identifying potential amendments to the Zoning Code or Design Guidelines and identifying incentives and strategies to encourage infill. The draft Infill Program was presented to the Sacramento County Planning Commission on June 24, 2024, and is targeted to be adopted by the Board of Supervisors in late August 2024. Sacramento

³ See the discussion of Strategy II, Growth Accommodation, on pages 24-37 of the General Plan Land Use Element. County of Sacramento, 2020a. General Plan Land Use Element. Amended October 2020. <https://planning.saccounty.gov/PlansandProjectsIn-Progress/Documents/Land%20Use%20Element%20Amended%2010-06-20.pdf>. Accessed July 3, 2024.

County is currently recruiting for an Infill Coordinator position in the Planning and Environmental Review Division.

The County is also implementing the Countywide Regional Housing Needs Allocation (RHNA) Rezone Project. The Draft SEIR for the Sacramento County Regional Housing Needs Allocation Rezone Project (State Clearinghouse No. 2023060304) was released in April of 2024 (Sacramento County 2024a). The Rezone Project was presented to the County Planning Commission on May 20, 2024, and is targeted to be adopted by the Board of Supervisors in late August 2024.

Adoption of a smart growth alternative would further focus development in areas close to employment centers, commercial services and amenities, and public facilities such as schools, fire stations, libraries, and parks/recreational opportunities. This approach assists in maximizing the use of existing infrastructure, preserves open space and natural resources, and reduces the distance individuals need to travel to meet their needs. Smart growth tends to create a greater range in housing and transportation options by incentivizing redevelopment of underutilized properties, thereby offering more choices and, potentially, a greater range of prices. Smart growth may also contribute to the economic development potential of existing communities by providing new investment opportunities, providing a framework for capital improvements, and supporting more efficient development patterns that allow for a wider mix of uses. A key component of smart growth as an approach to development and conservation is encouraging all stakeholders to participate in the decision-making process. Involving a broad set of stakeholders in planning for smart growth can help foster distinctive communities with a strong sense of place, resulting in increased access for a wider range of residents while creating new placemaking opportunities through the planning process. Due to each place's unique characteristics and stakeholder desires, development outcomes associated with applying new, focused, smart growth strategies in unincorporated communities would largely depend on the communities themselves and the viability of the strategies, programs, and incentives that would be implemented.

SMART GROWTH ALTERNATIVE 1: GPU EIR ALTERNATIVE 3, MIXED USE

DISCUSSION

This SEIR incorporates by reference the analysis in the GPU EIR (State Clearinghouse No. 2007082086) of GPU EIR Alternative 3: Mixed Use, which is land use alternative aimed at achieving smart growth.⁴ Incorporation by reference is particularly useful where, as here, an EIR relies on a program EIR prepared for a countywide land use planning decision such as a general plan update. The relationship between this SEIR and the GPU EIR is clear in that approval of the project would satisfy the requirement in

⁴ The alternatives analysis included in the GPU EIR is a matter of public record and is generally available for public review during normal business hours at the County of Sacramento Planning and Environmental Review Division, which is located at 827 7th Street, Sacramento, CA 95814, Second Floor. The GPU EIR, including the alternatives analysis, also is available for public inspection for all-hours access on its website: <https://planning.saccounty.gov/PlansandProjectsIn-Progress/Pages/GeneralPlan.aspx>.

GPU EIR Mitigation Measure CC-2 to prepare and adopt a CAP that will reduce GHG impacts from implementation of the General Plan. Relevant portions of the analysis are summarized below.

The Sacramento Area Council of Governments' (SACOG's) Blueprint project and the smart growth principles contained within it are the drivers for three alternatives evaluated in the GPU EIR. As described on page 3-4 of the GPU EIR:

The current best management practices applicable to planning are described most commonly as "smart growth". The land use and environmental benefits of smart growth principles are recognized by environmental protection groups and governmental regulatory agencies alike, and as such these principles are treated as an applicable land use policy in this EIR. Various regulatory agencies, including the Environmental Protection Agency, have published documents on smart growth along with a set of principles. Depending on the publication source, the details of the text of the principles and their order varies, but the core principles remain the same.

The GPU EIR also acknowledges (page 3-5) that "It has also been demonstrated that the greenhouse gas emission reductions incorporated within California's Executive Order S-3-05 are unlikely to be achieved just through vehicle efficiency and development of low-carbon fuels – significant vehicle trip reductions will also be required (Yang et al.) and can be fostered through smart growth land use policies." Alternative 3: Mixed Use is noted in the GPU EIR as the most progressive smart growth alternative and is summarized below.

Under a Mixed Use Alternative, the residential holding capacity projected by SACOG would be accommodated in existing planned growth areas (e.g., Elverta Specific Plan), through mixed use projects in the existing urbanized sphere, and through development of underutilized land. As described in the GPU EIR (pages 2-11 and 2-12), the Mixed Use Alternative would protect existing undeveloped open space, reduce VMT, and consolidate development and the corresponding revenue to support existing services. This alternative would reduce the potential buildout target to 100,000 dwelling units. The Grant Line East and the Jackson Highway Corridor New Growth Areas are located outside existing urbanized areas on what is predominantly undeveloped open space, so these areas are not included in the alternative. By comparison, the West of Watt area is within the urbanized area along a substantially developed and highly traveled thoroughfare, and so is included in the alternative; the Easton Planning Area also is included because it is located on contaminated land that has been subjected to past industrial use.

The Mixed Use Alternative assumes that if the General Plan does not identify large new growth areas, then the inevitable need for new housing would result in increased focus on revitalization of existing urbanized areas and infill development. This growth in the

urbanized core would be facilitated by several factors, including upzoning⁵ of residential district, 20 dwelling units per acre (RD-20) properties to RD-30 in response to affordable housing needs, the inclusion of less restrictive accessory dwelling standards in response to the needs of an aging population, and market-rate upzones throughout the county (but particularly in areas such as the undeveloped eastern side of the North Vineyard Station Specific Plan). These three strategies have the potential to generate an estimated 15,700 additional dwelling units and are supported by General Plan land use and transportation policies analyzed in the GPU EIR's Land Use chapter (Chapter 3) and Traffic and Circulation chapter (Chapter 9).

Potential strategies to implement a Mixed Use Alternative are summarized below.

- **Approve a Smart Growth Overlay Zone:** A land use overlay is a designation added to the underlying zoning of parcels. Areas subject to the overlay would be subject to a special set of policies and/or rules for development. Parcels within the Smart Growth Overlay would have a designator assigned that would govern the rules, policies, and procedures (e.g., incentives) for development. Parcels outside of the Smart Growth Overlay would have a different set of rules, policies, and procedures (e.g., disincentives) for development. Under this strategy, existing zoning rules would be supplemented, not changed.
- **Adopt Zoning Changes:** The County could amend the underlying zoning of land within the unincorporated county. This may include upzoning parcels, establishing minimum densities,⁶ implementing duplex and lot splits,⁷ and identifying mixed use and residential designations in underutilized commercial areas.⁸ Under this strategy, existing zoning rules would change and could be supplemented with an overlay zone as described above.
- **Authorize a Transfer of Development Rights Program.** A transfer of development rights program would allow a developer to purchase the rights from a property that the community wants to preserve and transfer those rights to another property. For example, if existing zoning allows one home to be built each on parcel 1 and parcel 2, a developer could “purchase” the right to build no houses on parcel 1 and two houses on parcel 2, resulting in a preclusion of development on parcel 1 (which would be protected as open space) and

⁵ *Upzoning* would allow property owners to legally build higher-density dwellings on a given parcel of land. For example, property originally intended for single-family detached homes could be upzoned to allow by right (without a permit) up to four individual units.

⁶ *Minimum density* specifications designate a minimum size (floor area ratio, or FAR) for new development to require at least that level of development on a parcel compared to its size.

⁷ A *lot-split* provision allows homeowners to divide a single-family lot into two separate lots, which would extend the number of possible dwelling units that can be built and sold and provide additional affordable housing opportunities than the original single-family homes.

⁸ In this analysis, *underutilized commercial areas* include privately-owned commercial properties in urban areas where irregular or intermittent economic activity occurs for productive purposes less than 4 months in any calendar year and the structures, infrastructure, and other facilities on the property are antiquated, obsolete, or in such poor repair that they cannot be used for the purposes for which they were originally constructed.

densification of development in the area of parcel 2. However, the success of such a program would be highly dependent on market dynamics and the identification and availability of suitable “receiver” sites.

SCREENING

Smart Growth Alternative 1 (GPU EIR Alternative 3: Mixed Use) has not been carried forward for more detailed review because it fails to meet screening criteria 1 and 3 as set forth in Section 3.2 and Table 3-1.

Table 3-1: Screening Smart Growth Alternative 1, GPU EIR Alternative 3: Mixed Use

Screening Criteria	Pass	Fail
1. Would the alternative meet most of the basic project objectives?		√
2. Would the alternative be potentially feasible?	√	
3. Would implementation of the alternative be remote or speculative?		√

Smart Growth Alternative 1 fails to meet screening criterion 1. This alternative would not meet most of the basic project objectives. This alternative would not result in the preparation and adoption of a CAP as required by GPU EIR Mitigation Measure CC-2 (objective #1). Further, this alternative requires a general plan amendment, would support growth not anticipated by the general plan, and would not result in the preparation of GHG forecasts that include reasonably foreseeable projects and population growth (objective #2). Because it would be speculative to predict the types of growth occurring under this alternative and the associated GHG emissions, this alternative would not establish GHG emission reduction targets tailored to the unincorporated county that align with State and County climate goals (objective #3). Because the forecast of emissions would be speculative, the target emission reductions needed would be unknown, this alternative would not provide a mechanism for streamlining project-level GHG emissions analysis consistent with CEQA Guidelines section 15183.5 (objective #6). This alternative would include development not anticipated by the general plan, which would be outside the bounds of streamlining GHG impacts. Finally, forecasts and targets (as discussed above) under this alternative would not meet the criteria of 15183.5(b)(1)(A) and 15183.5(b)(1)(B), respectively.

Smart Growth Alternative 1 preliminarily has been determined to meet screening criterion 2: This alternative preliminarily could be feasible because it has the potential to be capable of being accomplished successfully within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors. The subsequent planning efforts that would be required to implement this alternative by amending the adopted General Plan land use map and zoning code could be accommodated economically by prioritizing the efforts within the County’s budgeting process, environmentally as analyzed in the GPU EIR, socially (because this alternative has been recommended by members of the public for the County’s consideration), and

technologically (because land use amendment processes are squarely within the County's authority and practice).

The legal feasibility of implementing Smart Growth Alternative 1, however, is suspect because State law requires cities and counties to have no "net loss" of lower and moderate-income dwelling units and, as a result, the County could not take action that would reduce identified affordable housing sites for these income categories. State laws facilitating housing streamlining and development (including Senate Bill 330, known as the Housing Crisis Act) prevent the County from reducing residential capacity on a site zoned for housing without identifying replacement capacity. Nonetheless, because it is theoretically possible to implement Smart Growth Alternative 1 legally, the County preliminarily has determined this alternative to be potentially feasible.

Smart Growth Alternative 1 fails to meet screening criterion 3: Implementation of this alternative would be remote because it is unlikely or has only a slight chance of occurring. In adopting the 2030 General Plan in November 2011, the Sacramento County Board of Supervisors chose to adopt a modified version of the Mixed Use Alternative described in the GPU FEIR, including new growth management criteria. The new growth management criteria were developed to replace then-existing demand criteria for UPA expansion. The decision to choose a modified version of the Mixed Use Alternative arose from a determination by the Board of Supervisors that the demand-based model of defining UPA boundaries was problematic due to the extraordinarily turbulent market conditions that made it nearly impossible to accurately predict future housing demand (Sacramento County 2011c).

Legal possibility does not equate to high likelihood. Just because it could be legally possible to adopt the land uses changes that would be necessary to implement this alternative, does not mean that the County will prioritize its resources to accomplish it. For example, the Sacramento County Board of Supervisors voted unanimously on June 5, 2024 to approve a budget for Fiscal Year (FY) 2024-25 that reflects the County's prioritization of health services (including correctional health services); child, family, and adult services; human assistance; and law enforcement response capabilities above community development dollars (Sacramento County 2024b). County decision-makers engaged in a thorough, thoughtful process to reach its fiscal year budgeting decisions and could have, but did not, elect to allocate a level of finding for community development purposes that could be used to identify a community, or communities within which to focus smart growth programs and incentives,⁹ and dedication of staff time to prepare legislation such as a Smart Growth Zoning Overlay Ordinance and to develop a system of incentives and disincentives for residential, commercial, and mixed-use growth within the smart growth boundary. Additional environmental analysis would likely be required once sufficient details are known about the nature and intensity

⁹ The selection of areas within the unincorporated communities that could be considered "smart" places for new development could be based on factors including, but not limited to, opportunities for compact, efficient, and environmentally friendly design that is achievable; proximity to job centers, services, amenities and infrastructure (e.g., roads, water, sewer); and/or presence of existing or plans for future transit infrastructure (e.g., sidewalks, bike lanes, bus service, new transit service).

of the intensified development pattern to inform consideration of impacts on utilities and public service infrastructure (including emergency services, schools, and public transit), water supply, parks and other recreation opportunities, and other environmental factors.

SMART GROWTH ALTERNATIVE 2: VMT EFFICIENT ALTERNATIVE

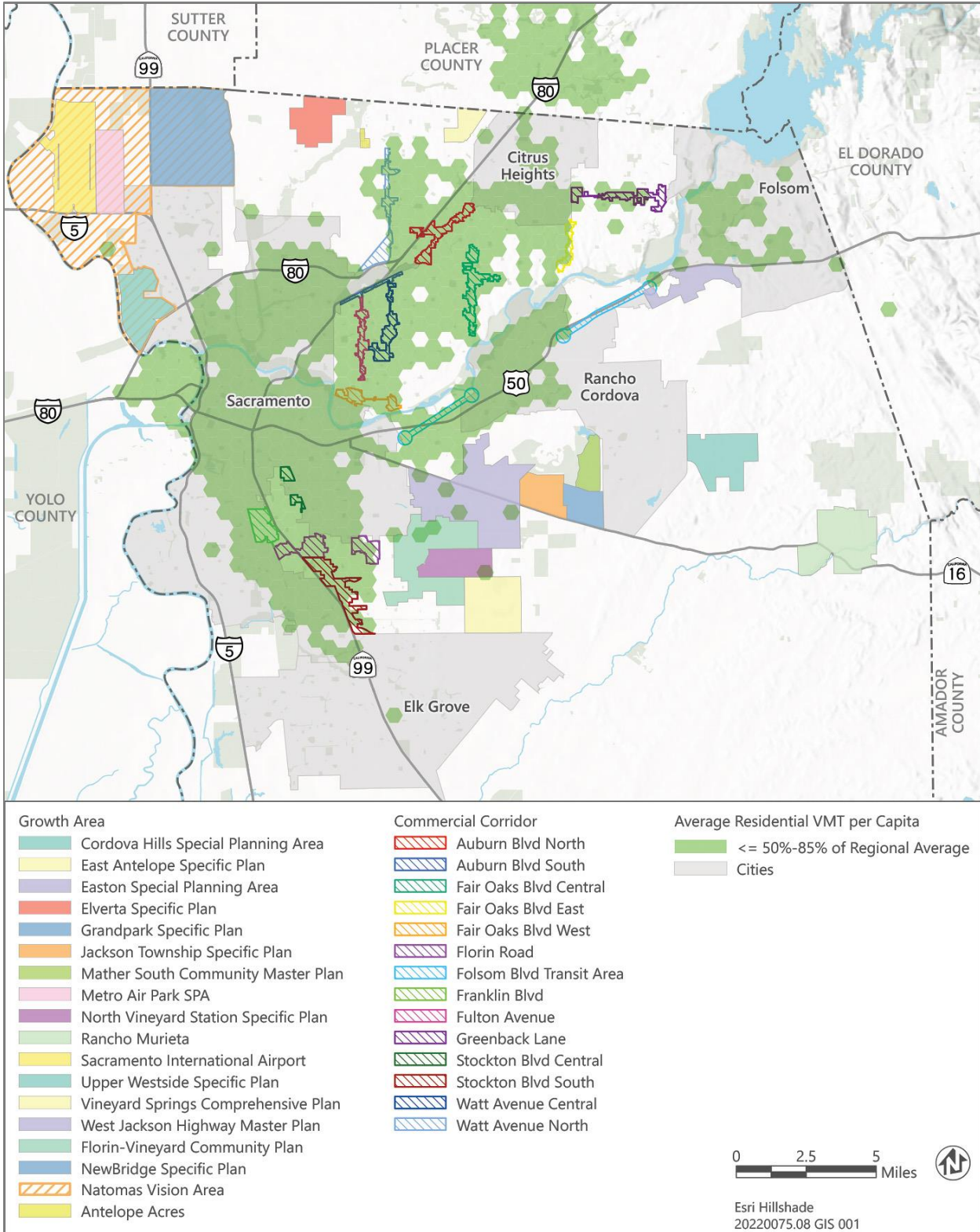
DISCUSSION

The project includes measures to address climate change by reducing countywide VMT including measure GHG-08 (Develop a VMT Impact Fee Program), GHG-09 (Reduce VMT from New Developments), GHG-10 (Revise Parking Standards), GHG-11 (Increase Transit Ridership), GHG-12 (Implement the Active Transportation Plan), and GHG-13 (Advance Infill Development). Through these measures, the CAP would reduce total VMT in the unincorporated county by 1 percent compared to adjusted business as usual scenario (ABAU) in 2030 and 5 percent in 2045.

The VMT Efficient Alternative would implement the CAP as proposed and go beyond it to further reduce the VMT generated by new development in existing urbanized areas that are identified by SACOG as VMT efficient. To support SB 743 implementation, SACOG staff developed screening maps for residential and office projects using outputs from the 2016 base year travel demand model run for the 2020 Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS). The SACOG travel demand model is activity/tour based and is designed to estimate an individual's daily travel, accounting for land use, transportation and demographics that influence people's travel behaviors. SACOG identifies VMT-efficient residential areas as those that achieve 15 percent below the regional average annual per-capita light-duty VMT (SACOG 2024).

This The VMT Efficient Alternative would go farther than the CAP and achieve a 25 percent reduction in VMT compared to ABAU. To achieve this, the alternative would advance aggressive policies to maximize building densities at locations served by public transit and to locate residences near jobs, shopping, and other services to reduce automobile dependency; and by enhancing bicycle, equestrian, and pedestrian programs as well as carpooling and rideshare programs. This would require amending the General Plan's Land Use and Housing Elements to incorporate additional, more aggressive policies, and could require rezoning some parcels to allow the siting of new combinations of land uses.

SACOG-identified VMT-efficient areas of the county are generally within the incorporated cities, south of the City of Sacramento along the State Route 99 corridor and northeast of the City of Sacramento between Interstate 80 and U.S. Highway 50. Figure 3-1 identifies the VMT efficient areas in the county that would meet the criteria of Smart Growth Alternative 2. This alternative would focus future growth away from rural areas and closer to existing and planned job centers and public facilities. Because of the limited geography within this area and because the County would not prohibit development of properties outside of the VMT-efficient areas, it is assumed for the purpose of this analysis some but not all of the growth that would have occurred outside VMT-efficient areas would instead be developed in these areas. Further, as noted above, it is assumed that all measures and actions in the CAP would be implemented.



Source: Data received from SACOG and Sacramento County in 2024; adapted by Ascent in 2024

Figure 3-1: Smart Growth Alternative 2: VMT Efficient Alternative

SCREENING

Smart Growth Alternative 2 (VMT Efficient Alternative) has not been carried forward for more detailed review because it fails to meet screening criteria 2 and 3 as set forth in Section 3.2 and Table 3-2.

Table 3-2: Screening Smart Growth Alternative 2, VMT Efficient Alternative

Screening Criteria	Pass	Fail
1. Would the alternative meet most of the basic project objectives?	√	
2. Would the alternative be potentially feasible?		√
3. Would implementation of the alternative be remote or speculative?		√

Smart Growth Alternative 2 meets screening criterion 1: Smart Growth Alternative 2: VMT Efficient Alternative would meet most of the project objectives because it would include the CAP as proposed.

Smart Growth Alternative 2 fails to meet screening criterion 2: This alternative would not be potentially feasible because it would not be capable of being accomplished successfully within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors. Total VMT in California and in the County is the product of myriad individual decisions made daily by households and businesses. More specifically, as stated by the University of California Institute of Transportation Studies (2021):

Household decisions about where, when, how often, and by what mode to travel determine their VMT; these decisions are conditioned by longer-term decisions about residential location and car ownership. Business decisions about shipments of material inputs and delivery of products or services determine VMT of goods movement. Business decisions about location influence household travel, for employees and customers, as do policies on remote work and online shopping. In other words, VMT is the product of the complex system of modern living.

Achieving a substantial reduction in VMT would require a major shift in decision-making by households and businesses alike, beyond the ability of the County to implement. Significantly improved transit and alternative transportation infrastructure, widespread and inexpensive access to single-occupancy vehicle alternatives, and substantial financial incentives to use these transportation alternatives or (alternatively) providing considerable disincentives to drive could all be part of the solution. However, there is no basis to assume that this alternative could be accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors. The time and expense required to implement this alternative, such as substantially upgrading transportation infrastructure, would compete with the County's pursuit of other community priorities, such as health, bridging the digital divide, child welfare, affordable housing, and homeless services and housing as demonstrated in the Fiscal Year 2024-25 annual budget (Sacramento County 2024c).

This alternative would be potentially feasible considering environmental factors because, to the extent that the VMT Efficient Alternative successfully directs development away from undeveloped areas and toward VMT-efficient areas, this alternative would be expected to reduce impacts of future development on biological resources, scenic resources, and agriculture in the county. Similarly, this alternative could direct development away from undeveloped areas that are in or near State Responsibility Areas and towards urban infill areas with existing capacity for planned growth, which could reduce the potential to exacerbate wildlife hazards. VMT may also be reduced under this alternative.

Due to previous land use decisions over multiple decades and associated investments in transportation infrastructure in past decades, the unincorporated county covers a substantial geographic area that includes urban development. The Urban Services Boundary (USB) defines the ultimate urban area, based on natural and environmental limits to growth, in the unincorporated county. This boundary is intended to be permanent, allowing modification only under extraordinary circumstances. The USB is intended to be used to develop long-range master plans to be implemented as the urban area expands. It is not feasible to change those past land use decisions because substantial infrastructure investments have occurred, are continuing to be funded, and the physical facilities already exist.

Smart Growth Alternative 2 fails to meet screening criterion 3: The successful implementation of this alternative is speculative because this alternative does not prohibit development outside of infill areas and the degree to which any incentives and disincentives would affect land use decisions is unknown. Further, the differences in land-based impacts are comparative to the General Plan itself, for which the CAP is a mitigation measure. Separately, mobile source GHG emissions modeling in the CAP is based on forecast total VMT (i.e., from existing land uses and new growth). Existing land uses comprise a larger portion of the total VMT than future growth and reductions to existing trips associated with implementation of the VMT Efficient Alternative, if any, would be modest. Therefore, while this alternative would result in greater GHG emissions reductions than the CAP alone due to the reduced VMT anticipated from new growth, the magnitude of the overall emissions reductions is unknown.

3.3.2 ALTERNATIVE LOCATIONS

DISCUSSION

The CAP and the measures established therein would apply to lands and land uses in unincorporated Sacramento County and County operations (i.e., County-owned facilities, vehicles, and equipment). CEQA Guidelines section 15126.6(f)(2) states that the “key question and first step” in selecting alternatives for more detailed consideration is “whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location. Only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR.” Accordingly, the County considered potential alternative locations.

SCREENING

The Alternative Locations Alternative has not been carried forward for more detailed review because it fails to meet screening criteria 1, 2, and 3 as set forth in Section 3.2 and Table 3-3.

Table 3-3: Screening Alternative Locations

Screening Criteria	Pass	Fail
1. Would the alternative meet most of the basic project objectives?		√
2. Would the alternative be potentially feasible?		√
3. Would implementation of the alternative be remote or speculative?		√

The Alternative Locations Alternative fails to meet screening criterion 1: This alternative would not meet most of the basic project objectives because it would not implement GPU EIR Mitigation Measure CC-2 to prepare and adopt a CAP that will reduce GHG impacts from implementation of the General Plan (because the General Plan would not be implemented outside the unincorporated areas), would not identify GHG emission reduction targets tailored to the unincorporated county, would not achieve the County's GHG emissions reduction targets for communities in the unincorporated county, and would not set a framework of sufficiently adaptable long-term GHG reduction strategies that embrace the creation of high-quality jobs in the county.

The Alternative Locations Alternative fails to meet screening criterion 2: This alternative would not be potentially feasible for legal reasons: the County would not have implementation or oversight authority outside the area where the CAP is proposed.

The Alternative Locations Alternative fails to meet screening criterion 3: This alternative would be remote and speculative because, with implementation or oversight authority, the County's selection of an Alternative Locations Alternative would be remote and speculative.

3.3.3 PROHIBITION ON GROWTH IN UNINCORPORATED COUNTY ALTERNATIVE

DISCUSSION

Forecast GHG emissions include both the continued operation of existing structures and associated resident behavior and emissions associated with anticipated population growth and development. This alternative would prohibit all new development in the unincorporated county except for previously approved or entitled development. All existing residential, commercial, office, industrial, public facilities, agriculture and open space, along with utilities and roadways would generally remain in their current condition. A prohibition on new development (a moratorium) would reduce GHG emissions by eliminating some of the leading causes of the atmospheric release of GHGs. No new sources of demand for electricity or heat production (which accounted for 34 percent of 2019 global GHG emissions), industry (which accounted

for 24 percent of 2019 global GHG emissions), or buildings (which account for 6 percent of 2019 global GHG emissions) would be developed in the unincorporated county (US EPA 2024). GHG emissions from agriculture, forestry, and other land uses (22 percent of 2019 global GHG emissions) and the transportation sector (15 percent of 2019 global GHG emissions) could still be generated under this alternative.

SCREENING

A Prohibition on Growth in Unincorporated County Alternative has not been carried forward for more detailed review because it fails to meet screening criteria 1, 2, and 3 as set forth in Section 3.2 and Table 3-4.

Table 3-4: Screening Prohibition on Growth in Unincorporated County Alternative

Screening Criteria	Pass	Fail
1. Would the alternative meet most of the basic project objectives?		√
2. Would the alternative be potentially feasible?		√
3. Would implementation of the alternative be remote or speculative?		√

A Prohibition on Growth in Unincorporated County Alternative fails to meet screening criterion 1: This alternative would not meet most of the basic project objectives because it would not satisfy the requirement of GPU EIR Mitigation Measure CC-2 to prepare and adopt a CAP that will reduce GHG impacts from implementation of the General Plan, would not reflect reasonably foreseeable projects and population growth, would not set a framework of sufficiently adaptable long-term strategies that consider and incorporate (as appropriate) additional GHG reduction strategies, would not provide a mechanism for streamlining of project-level GHG emissions analysis consistent with CEQA Guidelines section 15183.5, and would not develop climate adaptation strategies to guide the County to a more resilient future.

A Prohibition on Growth in Unincorporated County Alternative fails to meet screening criterion 2: This alternative would not be potentially feasible taking into account legal factors because it would be inconsistent with the County General Plan and would not accommodate the County's Regional Housing Needs Allocation, which is the amount of new housing that the State has assigned as the fair share of new housing units to build over the next eight years. Government Code section 65863 (the No Net Loss Law) requires that cities and counties ensure that their general plans provide for regional housing needs. Due to inconsistency with local and State requirements, this alternative would be infeasible. Separately, this alternative would not be potentially feasible taking into account economic and social factors because halting all development in the unincorporated county would impair the County's ability to grow, adapt, and remain economically viable.

The Prohibition on Growth in Unincorporated County Alternative fails to meet screening criterion 3: This alternative would be remote and speculative because it is unlikely that the County would pursue an option that would put it in conflict with State law.

3.3.4 CAP PLUS PROHIBITION ON GENERAL PLAN LAND USE MAP AMENDMENTS

DISCUSSION

This alternative would supplement implementation of the CAP as proposed to prohibit general plan amendments that affect the density and intensity of land uses. This alternative would preserve the accuracy of the GHG forecasts in the CAP. Some changes in density (e.g., higher density in rural areas and lower density near urban centers) can be associated with higher VMT, which is a factor in calculations of the GHG emissions of the unincorporated county.

SCREENING

A CAP Plus Prohibition on General Plan Land Use Map Amendments Alternative has not been carried forward for more detailed review because it fails to meet screening criteria 2 and 3 as set forth in Section 3.2 and Table 3-5.

Table 3-5: Screening CAP Plus Prohibition on General Plan Land Use Map Amendments Alternative

Screening Criteria	Pass	Fail
1. Would the alternative meet most of the basic project objectives?	√	
2. Would the alternative be potentially feasible?		√
3. Would implementation of the alternative be remote or speculative?		√

A CAP Plus Prohibition on General Plan Land Use Map Amendments Alternative meets screening criterion 1: This alternative would meet all of the basic project objectives of the project because it would implement the CAP as proposed.

A CAP Plus Prohibition on General Plan Land Use Map Amendments Alternative fails to meet screening criterion 2: This alternative would not be potentially feasible because it would not be capable of being accomplished successfully within a reasonable period of time, taking into account legal, social, and policy reasons. Under State law, the Board of Supervisors cannot prohibit future Boards of Supervisors from revising, modifying, or amending the County's General Plan and corresponding GHG reduction plans in the future. Separately, the recently adopted General Plan Update expresses the County's vision and establishes goals and policies that reflect community values. This alternative would essentially reverse the landscape level planning decisions made in that document in the context of implementing a mitigation measure and, as such, would not be appropriate.

A CAP Plus Prohibition on General Plan Land Use Map Amendments Alternative fails to meet screening criterion 3: This alternative would be remote and speculative because it is unlikely that the County would implement this alternative based on the policy and other reasons identified in the context of screening criterion 2.

3.3.5 COMMUNITYWIDE CARBON NEUTRALITY ALTERNATIVE

DISCUSSION

Successful implementation of the CAP's GHG emissions reduction measures would not be enough for the County to achieve carbon neutrality by 2030 or 2045. In the year 2045, residual emissions of more than 1.2 million metric tons of carbon dioxide equivalent (MTCO_{2e}) would still be originating from the following sources:

- Commercial, industrial, and residential buildings and energy industries that could reduce but not eliminate natural gas.
- Light-duty vehicles and heavy-duty trucks.
- High global warming potential GHGs.
- Solid waste disposal.
- Water supply and wastewater treatment.
- Off-road equipment.
- Agricultural activities.

Please refer to Chapter 2 and Appendix F of the Draft 2045 CAP for more information.

The Sacramento County Board of Supervisors adopted resolution declaring a Climate Emergency (Sacramento County 2020b). Adoption of the Resolution commits the County to take several steps to transition toward countywide carbon neutrality by 2030. A 2030 carbon neutrality goal and task force are mentioned in the following portions of the Resolution.

- Develop and implement a climate and sustainability plan that identifies and integrates current and future actions necessary to achieve an equitable, sustainable, and resilient economy and transition to a countywide carbon neutrality footprint by 2030.
- Communitywide Climate Action Plan shall explain the County's approach to reduce GHG emissions to achieve carbon neutrality by 2030, building on recommendations and analysis from community partners, and suggested mitigation measures from climate experts, urban and regional planners, community members, and economists. Development and implementation of the plan shall be guided by science, data, best practices, and equity concerns.
- Build on existing climate action commitments and taking significant steps to sustain and accelerate short term communitywide carbon elimination, and all efforts and actions necessary to eliminate emissions by 2030, recognizing that such a goal will only be achieved through regional collaboration between multiple partners.

- Evaluate the resources necessary to achieve carbon neutrality by 2030, and the emergency actions required to eliminate emissions by 2030. Where existing funding or resources do not support the level of action required, County staff shall identify gaps and provide recommendations to the County Executive and Board of Supervisors.
- The County of Sacramento will establish, within 60 days, a permanent Climate Emergency Mobilization Task Force composed of climate experts including but not limited to representatives of the scientific community and academia to oversee the development and implementation of a climate emergency response plan utilized by all departments within the County of Sacramento, and each department shall assign a point person to provide regular updates to the Task Force and the Board of Supervisors concerning departmental progress in reducing emissions.

A Communitywide Carbon Neutral Alternative would align with the climate emergency resolution and include implementation of carbon dioxide removal (CDR) technologies and sweeping policy changes, including a prohibition on issuance of business licenses to companies that provide fuels, equipment, and services that result in the combustion of fossil fuels; point-of-sale conversion to all electric building energy use; adding tolls to major County-operated thoroughfares; and issuing a new building moratorium based on per capita VMT. To obtain carbon neutrality by 2030, it is expected that the following actions would need to occur:

- Electrifying 90–100 percent of buildings and facilities in the County, including residential, commercial, industrial, and energy industries.
- Achieving zero (or near-zero) waste landfilling.
- Having more than 90 percent of the Countywide vehicle fleet, including light-duty passenger vehicles and heavy-duty trucks, be zero-emission vehicles.
- Transitioning all refrigerants, fire suppressants, and consumer products used within the County to substitutes with extremely low (or zero) global warming potential.
- Replacing nearly all off-road equipment and off-road vehicles (including locomotives) with electric, green hydrogen, or other zero-emission engine technologies.
- Capturing nearly all fugitive wastewater treatment process emissions and converting to fuel.
- Eliminating nitrous oxide emissions from fertilizer application.
- Implementing statewide, regional, and local carbon removal and carbon capture and sequestration strategies to offset all remaining residual emissions.

SCREENING

A Communitywide Carbon Neutral Alternative has not been carried forward for more detailed review because it fails to meet screening criteria 2 and 3 as set forth in Section 3.2 and Table 3-6.

Table 3-6: Screening Communitywide Carbon Neutral Alternative

Screening Criteria	Pass	Fail
1. Would the alternative meet most of the basic project objectives?	√	
2. Would the alternative be potentially feasible?		√
3. Would implementation of the alternative be remote or speculative?		√

A Communitywide Carbon Neutral Alternative meets screening criterion 1: This alternative would meet most of the basic project objectives of the project because it would result in preparation and adoption of a CAP that would reduce GHG impacts, including from implementation of the General Plan; would include reasonably foreseeable projects and population growth; and would align with the County’s climate emergency resolution.

A Communitywide Carbon Neutral Alternative fails to meet screening criterion 2: This alternative would not be potentially feasible taking into account economic factors because a commitment to “identify gaps and provide recommendations” is not anticipated to lead to successful implementation within a reasonable period of time where existing funding or resources do not support the level of action required.

Separately, this alternative would not be potentially feasible taking into account technological factors. The County’s aspirational carbon neutrality goal set through the County’s Climate Emergency Resolution adopted by the Board of Supervisors in 2020 is not aligned with the statewide goal of achieving net zero emissions by 2045 established under AB 1279. The State and County have undertaken substantial planning efforts since the 2020 adoption of the Emergency Resolution to evaluate the feasibility of aggressive emissions reductions. In 2022, AB 1279 was signed into law, which requires the State to develop and implement a strategy for achieving a statewide GHG emissions reduction target of 85 percent below 1990 levels, as well as net zero emissions, by 2045 or sooner and net negative emissions thereafter. The 2022 Scoping Plan lays out a path to achieve statewide targets for both carbon neutrality and reducing anthropogenic GHG emissions by 85 percent below 1990 levels by 2045. It addresses the AB 1279 emissions limits by identifying a technologically feasible, cost-effective scenario—referred to as the Scoping Plan Scenario—to achieve these goals. The Scoping Plan Scenario identifies a path to keep California on track to meet its SB 32 GHG reduction target of at least 40 percent below 1990 emissions by 2030 but concludes that additional reductions are needed by 2030 (i.e., 48 percent below 1990 levels) for the State to stay on track to achieve net zero GHG emissions by 2045, pursuant to AB 1279 (CARB 2022). In addition, the 2022 Scoping Plan shows that natural and working lands are projected to be a net source of GHG emissions in 2030 and that with residual

anthropogenic emissions, additional CDR technologies are required to reach net zero emissions by 2045.

To go beyond an 85 percent reduction in anthropogenic emissions and achieve statewide net zero emissions by 2045, the 2022 Scoping Plan relies on large-scale deployment of carbon capture, utilization, and storage (CCUS) technologies and mechanical CDR strategies like direct air capture machines. These projects are subject to pending regulatory actions by the California Air Resources Board (CARB) pursuant to SB 905 (codified in 2022), which requires CARB to create the Carbon Capture, Removal, Utilization, and Storage Program to evaluate, demonstrate, and regulate CCUS and CDR projects and technology. The bill requires CARB, on or before January 1, 2025, to adopt regulations creating a unified statewide permitting application for approval of CCUS and CDR projects. The bill also requires the Secretary of the Natural Resources Agency to publish a framework for governing agreements for two or more tracts of land overlying the same geologic storage reservoir for the purposes of a CCUS project. The County does not have the jurisdiction or other ability to permit, construct, and operate CCUS and mechanical CDR strategies at the pace and scale needed to achieve net zero emissions by 2045. The 2022 Scoping Plan also assumes that additional reductions in statewide anthropogenic emissions beyond 85 percent below 1990 levels by 2045 would not be cost-effective or technologically feasible.

CARB evaluated two alternatives to the Scoping Plan scenario to achieve statewide carbon neutrality by 2035 in the Draft 2022 Scoping Plan: Alternative 1 would require carbon neutrality by 2035, nearly complete phaseout of all combustion, limited reliance on carbon capture and sequestration and engineered carbon removal, restricted applications for biomass derived fuels, and Alternative 2 would require carbon neutrality by 2035 and aggressive deployment of a full suite of technology and energy options, including engineered carbon removal (CARB 2022: 41). CARB found that these alternatives were not feasible and would require substantially less economic growth than projected for the state through 2035 and be nearly an order of magnitude more costly than the Scoping Plan scenario. Specifically, CARB found that Alternatives 1 and 2 would, compared to the Scoping Plan Scenario by 2035, slow job growth by a factor of 3-5, have direct cost 6-7 times greater, slow economic growth by a factor of 8, and slow economic growth 5-6 times. CARB also found that although Alternatives 1 and 2 would deliver more health savings by 2045 compared to the Scoping Plan Scenario, they come with the highest cost and impacts to the economy and jobs, and least feasibility due to the pace of growth needed for clean energy.

For these reasons, this alternative has not been carried forward for detailed analysis.

A Communitywide Carbon Neutral Alternative fails to meet screening criterion 3: This alternative would be remote or speculative because successful implementation would rely on the availability and allocation of sufficient funding and regional collaboration between multiple partners.

3.4 ALTERNATIVES EVALUATED IN DETAIL

3.4.1 NO PROJECT ALTERNATIVE

DISCUSSION

CEQA Guidelines section 15126.6(e) requires an EIR to evaluate the impacts of a no project alternative to enable a comparison of the potential environmental consequences that would result with and without the proposed project. The No Project Alternative assumes that the CAP would not be adopted or implemented by the County. As a result, the County would not adopt measures and actions to reduce GHG emissions in accordance with State-mandated reduction targets. None of the benefits and co-benefits identified for the CAP would be realized. This alternative would not satisfy the requirement of GPU EIR Mitigation Measure CC-2 to prepare and adopt a CAP that will reduce GHG impacts from implementation of the General Plan and would not provide a clear pathway for the County to meet and exceed the statewide 2030 GHG emissions reduction goal identified in SB 32 or to meet the 2045 carbon neutrality goal established by AB 1279. Climate adaptation strategies would not be developed to guide the County to a more resilient future, potentially leaving county residents and visitors at greater risk from increasingly extreme weather events and wildfire conditions. Proponents of development within the unincorporated County would not have a mechanism available to streamline project-level GHG emissions analyses consistent with CEQA Guidelines section 15183.5. Instead, new developments would continue to be reviewed under CEQA on an individual basis.

The No Project Alternative would not meet any of the project objectives. For example, the No Project Alternative would not implement GPU EIR Mitigation Measure CC-2, which requires the preparation and adoption of a CAP that will reduce GHG impacts from the General Plan, it would not establish measures that meet the County's GHG reduction targets for 2023, it would not establish a mechanism for streamlined analysis of GHG emissions, and it would not establish feasible and effective GHG reduction measures with clear implementation details.

SCREENING

A No Project Alternative has been carried forward for more detailed consideration consistent with CEQA Guidelines section 15126.6(e)(1) even though it fails to meet screening criterion 1 as set forth in Section 3.2 and Table 3-7.

Table 3-7: Screening No Project Alternative

Screening Criteria	Pass	Fail
1. Would the alternative meet most of the basic project objectives?		√
2. Would the alternative be potentially feasible?	√	
3. Would implementation of the alternative be remote or speculative?	√	

A No Project Alternative fails to meet screening criterion 1: This alternative would not meet any of the objectives of the Project. GPU EIR Mitigation Measure CC-2 would not be implemented; no response would be made to requests to prepare GHG forecasts that include reasonably foreseeable projects and population growth; no GHG emission reduction targets would be identified for the unincorporated county or the County's government operations that align with State and County climate goals; the County's GHG emissions reduction targets would not be achieved for communities in the unincorporated county; no framework would be set of sufficiently adaptable long-term strategies for the consideration or additional GHG reduction strategies; no CEQA streamlining mechanism consistent with CEQA Guidelines section 15183.5 would be available in the county; and the County will not have adopted climate adaptation strategies that guide the County to a more resilient future.

A No Project Alternative passes screening criterion 2: This alternative would be potentially feasible because County decisionmakers could decline to adopt the CAP within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors. While GHG impacts would be assessed on a project-by-project basis without the CAP in place, it would likely be more difficult for the County to achieve an equivalent level of emission reductions and would likely result in inconsistencies with legislative requirements. Therefore, this alternative would likely result in greater GHG impacts. Transportation impacts related to VMT would also be greater under the No Project Alternative. As described in Chapter 8, "Transportation," and above, the CAP includes programs designed to reduce GHG emissions from the transportation sector through VMT reduction. Compared to business as usual, the No Project Alternative would generate more VMT than would occur with implementation of the CAP. Therefore, although the feasibility of the No Project Alternative is suspect from an environmental perspective, the County nonetheless initially concludes that the No Project Alternative is potentially feasible.

A No Project Alternative passes screening criterion 3: It is neither remote nor speculative that County decisionmakers could elect to exercise their discretionary decision-making authority in a way that does not include adoption of the CAP.

COMPARATIVE ANALYSIS

As analyzed in Chapters 4 through 8, the project would cause no new significant impact and no substantial increase in the severity of a significant impact than was disclosed in the GPU EIR. This also is true of the No Project Alternative. Further, the No Project Alternative would result in less environmental impacts than the project because none of the impacts of constructing and operative infrastructure to support the measures and actions in the CAP would result. Although, as noted above, impacts related to GHG emissions and transportation may be greater than with implementation of the CAP. The additional CAP VMT reductions of 1 percent in 2030 and 5 percent in 2045 would not occur. Additional resource sectors may also have slightly greater long-term impacts under the ABAU scenario than with the CAP. For example, GHG reduction measures commonly improve air quality and result in greater energy efficiency.

3.4.2 CARBON NEUTRAL NEW DEVELOPMENT ALTERNATIVE

DISCUSSION

Under a Carbon Neutral New Development Alternative, the proposed CAP would be supplemented to add a new GHG reduction measure requiring future development projects needing an amendment to the urban policy area (UPA) and/or urban services boundary (USB) to demonstrate zero net GHG emissions from project construction and operation. To demonstrate this, a GHG analysis would be required for inclusion in project applications that calculates project GHG emissions during construction and full buildout and that demonstrates reduction of such emissions to 0 metric tons of carbon dioxide equivalent through advanced project designs that incorporate energy efficiency, renewable energy generation, zero-emission modes of transportation, carbon sequestration and removal, and/or investments in initiatives with third-party-validated GHG reduction benefits. The GHG analysis would also be required to calculate the loss of carbon sequestration capacity of the proposed development project area. All future development projects needing an amendment to the UPA and/or USB would also be required to comply with all CAP consistency requirements by completing the Checklist or explain why certain consistency requirements are not applicable to the project.

Under existing General Plan policies, proposed master plans outside of the UPA and USB are already required to submit justification statements (LU-119) and demonstrate compliance with design and performance standards (LU-120) prior to the County considering approval of the project. This alternative would require comparable justification and compliance at the project level by adding a carbon neutral development standard to these existing requirements. Specifically, LU-120 states “the County shall only consider approval of a proposed UPA expansion and/or Master Plan outside of the existing UPA if the Board of Supervisors finds that the proposed project is planned and will be built in a manner that: meets all of the requirements per PC-1 through PC-10 and meets ONE of two alternative performance metrics: Alternative #1- Criteria-Based or Alternative #2 VMT/GHG Emissions Reduction Metric.” PC-8 specifies that the project must demonstrate “consistency with all applicable County adopted plans not sought to be amended by the proposed project.” Under this alternative, the CAP would also require new development outside of the UPA to demonstrate carbon neutrality. Such a requirement would supplement the existing Alternative #2 VMT/GHG metric, which addresses GHG emissions exclusively from the transportation sector of project construction and operations. To ensure that applicant-submitted carbon neutrality plans are proposing GHG reduction strategies with legitimate long-term benefits, the implementation and responsibility details would specify the involvement of a third-party agency or registry body to assist County staff with reviewing that portion of the application.

Under this alternative, new development outside of the UPA would be permitted to purchase and retire GHG offset credits. GHG offset projects could increase or protect carbon sequestration, invest in solar or wind projects, improve water or energy efficiency, capture methane at animal farms or landfills, replace high-global-warming-potential gas use with a gas that has a lower global warming potential, or implement other measures subject to quantification of the costs per MT CO_{2e}. To achieve the

greatest environmental co-benefits to the County, priority would be given, from highest to lowest, to offsets purchased from local projects in Sacramento County's Environmental Justice communities, elsewhere within Sacramento County, regional projects (in the SACOG region), and projects within California's Central Valley.

SCREENING

The Carbon Neutral New Development Alternative has been carried forward for more detailed consideration because it passes all of the screening criteria set forth in Section 3.2 and Table 3-8. The Carbon Neutral New Development Alternative would pass screening criterion 1 because it would meet all of the basic objectives of the project; it would implement the CAP as supplemented to require future development projects needing an amendment to the UPA and/or USB to demonstrate zero net GHG emissions from project construction and operation. Additionally, this alternative would advance GHG reductions throughout the county by implementing additional measures to ensure that development in new growth areas is carbon neutral, which is a higher standard than would occur under the CAP.

The Carbon Neutral New Development Alternative would pass screening criteria 2 and 3 because its implementation would be potentially feasible and neither remote nor speculative, it would be likely to result if approved. This is in part because voluntary GHG offset credits could be used to achieve net zero GHG emissions for future development projects needing an amendment to the UPA and/or USB, although costs to developers could be greater if measures with larger greenhouse gas emissions reduction values were offset rather than implemented. The method of achieving carbon neutrality would not be prescribed in the CAP under this alternative and would be determined during review of the application to amend the UPA or USB.

Carbon neutral new growth has been demonstrated to be feasible by the County-approved Jackson Township Specific Plan project. The Jackson Township project includes an amendment to the UPA, and a project-specific Greenhouse Gas Reduction Plan was prepared and found to be technically adequate by the Sacramento Metropolitan Air Quality Management District. The Greenhouse Gas Reduction Plan includes several project-specific measures that achieve net negative GHGs at project buildout.

Table 3-8: Screening Carbon Neutral New Development Alternative

Screening Criteria	Pass	Fail
1. Would the alternative meet most of the basic project objectives?	√	
2. Would the alternative be potentially feasible?	√	
3. Would implementation of the alternative be remote or speculative?	√	

COMPARATIVE ANALYSIS

As analyzed in Chapters 4 through 8, the project would cause no new significant impact and no substantial increase in the severity of a significant impact than was disclosed in the GPU EIR. This also is true of the Carbon Neutral New Development Alternative. The

Carbon Neutral New Development Alternative would result in the same impacts as the project except for any impacts resulting from activities implemented to make new development proposed outside the UPA and USB carbon neutral. In the near term, imposition of this standard could impede growth in undeveloped areas of the county. However, with advancement in technology and the availability of the necessary materials, no long-term effects on development would be anticipated.

AESTHETICS

Like the project, the Carbon Neutral New Development Alternative would cause no new significant impacts and no substantial increase in the severity of a significant impact on aesthetics than was disclosed in the GPU EIR. The Carbon Neutral New Development Alternative would include all the same GHG reduction and resiliency policies as the proposed CAP. Implementation of these policies would result in circumstances requiring construction activities or equipment, such as use of a tall crane that would temporarily introduce substantial height, bulk, or mass within a scenic vista. Because these circumstances would be rare and the duration would be limited to relatively short periods of the overall construction phase, the temporary effect on scenic vistas would not be substantial. In addition, given the nature of the GHG reduction measures, construction activities associated with their implementation would generally occur in already disturbed, urbanized developed areas such as roadways and parking lots and would not occur within non-urbanized areas. As discussed for the proposed CAP, infrastructure upgrades that would result from implementation would generally be consistent with the existing urban environment. Fees collected by the County from developers/builders would be used for the purposes of facilitating infill development in urban locations that are already targeted for development but would not directly result in construction of infill.

Implementation of the Carbon Neutral New Development Alternative also would result in the use of temporary lighting sources during construction of roadway improvement projects and installation of PV solar systems. Implementation of the other GHG reduction measures in the proposed CAP would not involve short- or long-term physical changes that could result in new substantial sources of light and glare. Enforcement of the Zoning Code would regulate new sources of light and glare to avoid affecting day or nighttime views. For example, Title III requires that lighting be directed away from residential areas and public streets so that glare is not produced that could impact the general safety of vehicular traffic and the privacy and well-being of residents.

To the extent that the Carbon Neutral New Development Alternative successfully directs potential development away from undeveloped areas (e.g., because the carbon neutral standard's attendant development requirements would not apply within the UPA and USB), this alternative could reduce impacts of future development on scenic resources in the county. However, the Carbon Neutral New Development Alternative would not prohibit development outside of the UPA and the degree to which the additional costs to developers in these areas (as a result of materials costs) would affect land use decisions is unknown. Overall, the aesthetic impacts of the Carbon Neutral New Development Alternative would be **similar** to the impacts identified in the GPU EIR.

AGRICULTURAL AND FOREST RESOURCES

Like the project, the Carbon Neutral New Development Alternative would cause no new significant impacts and no substantial increase in the severity of a significant impact on agricultural and forest resources than was disclosed in the GPU EIR. As described in the proposed CAP, implementation of the GHG reduction measures pertaining to agriculture would establish programs to support and enhance existing agricultural land uses to implement carbon farming practices. The Carbon Neutral New Development Alternative does not propose development that would cause incompatible land uses, conversion of Important Farmland to nonagricultural use, or reduce Williamson Act contracted acreage. Minor land conversions may be required for infrastructure necessary to implement CAP policies. Upgraded infrastructure is generally considered compatible with agricultural uses, and all subsequent projects would be subject to the requirements of the applicable zoning code. Requiring carbon neutral development for UPA and/or USB expansions would not affect potential for impacts to agricultural and forest resources. Overall, the impacts of the Carbon Neutral New Development Alternative on agriculture and forest resources would be **similar** to the impacts identified in the GPU EIR.

AIR QUALITY

Like the project, the Carbon Neutral New Development Alternative would cause no new significant impacts and no substantial increase in the severity of a significant impact on air quality than was disclosed in the GPU EIR. Like the proposed CAP, the Carbon Neutral New Development Alternative is not a growth-inducing plan and does not contemplate a change in land uses from those discussed in the GPU EIR. Implementation of the CAP would not increase development potential beyond what was assumed and analyzed in the GPU EIR or result in changes to existing land use and zoning designations. Further, as discussed for the CAP, implementation of the Carbon Neutral New Development Alternative would not increase air quality emissions such that they would exceed SMAQMD standards beyond what was considered in the GPU EIR. Further, by requiring carbon neutral development for UPA and/or USB expansions, this alternative could improve regional air quality through indirect air quality co-benefits from greater GHG emission reduction requirements. Overall, the air quality impacts of the Carbon Neutral New Development Alternative would be **slightly less** than the impacts identified in the GPU EIR.

BIOLOGICAL RESOURCES

Like the project, the Carbon Neutral New Development Alternative would cause no new significant impacts and no substantial increase in the severity of a significant impact on biological resources than was disclosed in the GPU EIR. The Carbon Neutral New Development Alternative would include the same GHG reduction measures as the CAP. Implementation could result in physical effects on the environment and would be required to comply with existing federal, State, and local regulations and policies, as well as the SSCHP for projects located in the SSHCP plan area. These activities would also be consistent with General Plan Policies CO-58, CO-59, CO-61, CO-75, CO-76, and CO-78. Requiring carbon neutral development for UPA and/or USB expansions would not affect potential for impacts to biological resources because the same potential

land areas would be developed. Overall, the impacts of the Carbon Neutral New Development Alternative on biological resources would be **similar** to the impacts identified in the GPU EIR.

CULTURAL RESOURCES

Like the project, the Carbon Neutral New Development Alternative would cause no new significant impacts and no substantial increase in the severity of a significant impact on cultural resources than was disclosed in the GPU EIR. Implementation of the Carbon Neutral New Development Alternative would have the potential to alter existing historic and archaeological resources because this alternative would include the same GHG reduction and adaptation measures with potential to result in physical disturbance or modification of cultural resources. Requiring carbon neutral development for UPA and/or USB expansions would not affect potential for impacts to cultural resources because the same land areas could be potentially developed. Overall, the impacts of the Carbon Neutral New Development Alternative on cultural resources would be **similar** to the impacts identified in the GPU EIR.

ENERGY

Like the project, the Carbon Neutral New Development Alternative would cause no new significant impacts and no substantial increase in the severity of a significant impact on energy resources than was disclosed in the GPU EIR. As described for the CAP, the GHG reduction measures common to the CAP and the Carbon Neutral New Development Alternative would introduce a series of additional energy-saving measures that promote enhanced energy conservation from projects that are constructed and operated within the county. Requiring new development outside of the UPA and/or USB to be carbon neutral would result in these projects adopting a variety of measures to reduce GHG emissions, which could result in reduced energy use. Overall, the impacts of the Carbon Neutral New Development Alternative on energy would be **slightly less** than the impacts identified in the GPU EIR because of the greater energy efficiency assumed for new development outside the UPA and USB.

GEOLOGY AND SOILS

Like the project, the Carbon Neutral New Development Alternative would cause no new significant impacts and no substantial increase in the severity of a significant impact on geology and soils than was disclosed in the GPU EIR. As described above for the proposed CAP, the GHG reduction measures common to the CAP and the Carbon Neutral New Development Alternative would support future EV infrastructure, transit access improvements, updates to community and corridor plans, infill development, and solar for County buildings. These activities would be consistent with the General Plan and would be required to comply with provisions for geological stability established by the Uniform Building Code and California Building Code. In addition, the CAP would not amend, revise, or be inconsistent with any existing regulations related to geology and soils. Requiring carbon neutral development for UPA and/or USB expansions would not affect potential for impacts to geology and soils. Overall, the impacts of the Carbon Neutral New Development Alternative on geology and soils would be **similar** to the impacts identified in the GPU EIR.

GREENHOUSE GASES AND CLIMATE CHANGE

Like the project, the Carbon Neutral New Development Alternative would cause no new significant impacts and no substantial increase in the severity of a significant impact on GHG emissions than was disclosed in the GPU EIR. The Carbon Neutral New Development Alternative would include measures that support infill, transit-oriented development, and mixed-use projects to reduce emissions from reduced VMT and increase building energy efficiency. These CAP measures prioritize or incentivize infill, transit-oriented development, and mixed-use projects, all types of measures intended to reduce overall VMT and GHG emissions from mobile sources. Like the CAP, the Carbon Neutral New Development Alternative would reduce GHG emissions generated within the unincorporated county by supporting low and zero emissions vehicles and equipment, encouraging green building practices, encouraging carbon sequestration practices, reducing VMT, increasing alternative modes of transportation, and increasing the use of renewable clean energy. In addition, GHG reduction measures that support energy efficiency and renewable energy generation would reduce GHG emissions at power plants generating electricity that serve the unincorporated county.

To achieve carbon neutrality, new development outside of the UPA and/or USB would include additional measures, including energy efficiency, renewable energy generation, clean transportation, carbon sequestration and/or investments in initiatives with validated GHG reduction benefits, including voluntary GHG offset credits, to reduce GHG emissions. Overall, the impacts of the Carbon Neutral New Development Alternative on GHG emissions would be **similar** to the impacts identified in the GPU EIR although the Carbon Neutral New Development Alternative would have greater potential long-term benefits.

HAZARDS AND HAZARDOUS MATERIALS

Like the project, the Carbon Neutral New Development Alternative would cause no new significant impacts and no substantial increase in the severity of a significant impact on hazards and hazardous materials than was disclosed in the GPU EIR. The Carbon Neutral New Development Alternative would include the GHG reduction measures and resiliency measures evaluated for the proposed CAP. These activities would be consistent with General Plan Polices HM-4, HM-7, HM-11, and HM-14 and would be required to comply with federal, State, and local regulations. As described in the GPU EIR, compliance with these regulations is anticipated to substantially avoid the release of hazardous materials associated with routine use and disturbance of hazardous materials. The Carbon Neutral New Development Alternative would not amend, revise, or be inconsistent with any existing regulations related hazards and hazardous materials. Requiring carbon neutral development for UPA and/or USB expansions would not affect potential for impacts to hazards and hazardous materials because the same type of development would occur. Overall, the impacts of the Carbon Neutral New Development Alternative on hazards and hazardous materials would be **similar** to the impacts identified in the GPU EIR.

HYDROLOGY AND WATER QUALITY

Like the project, the Carbon Neutral New Development Alternative would cause no new significant impacts and no substantial increase in the severity of a significant impact on hydrology and water quality than was disclosed in the GPU EIR. Implementation of the Carbon Neutral New Development Alternative would not violate water quality standards or waste discharge requirements because the CAP would not result in ground-disturbing activities that would substantially contribute to soil erosion or water quality issues. As discussed for the proposed CAP, activities would be consistent with General Plan Policies CO-24, CO-27, CO-28, CO-29, CO-30, CO-31, and CO-32 and would be required to comply with the Sacramento County Stormwater Ordinance (Sacramento County Code 15.12), Land Grading and Erosion Control Ordinance (Sacramento County Code 16.44), as well as implementation of an Erosion and Sediment Control Plan, best management practices, and National Pollutant Discharge Elimination System requirements. Implementation of the CAP would not decrease water supply or increase the rate or amount of runoff because it does not include projects that would substantially increase impervious surfaces or require the use of groundwater. Overall, the impacts of the Carbon Neutral New Development Alternative on hydrology and water quality would be **similar** to the impacts identified in the GPU EIR.

LAND USE AND PLANNING

Like the project, the Carbon Neutral New Development Alternative would cause no new significant impacts and no substantial increase in the severity of a significant impact on land use and planning than was disclosed in the GPU EIR. The Carbon Neutral New Development Alternative would not physically divide an established community or conflict with an adopted land use plan. To achieve carbon neutrality, new development outside of the UPA and/or USB would include additional measures, including energy efficiency, renewable energy generation, clean transportation, carbon sequestration and/or investments in initiatives with validated GHG reduction benefits, to further reduce GHG emissions. Requiring carbon neutral development for UPA and/or USB expansions would not affect potential impacts to land use and planning as the same areas would be potentially developed. However, by establishing an additional requirement for development outside of the UPA and/or USB, it could discourage growth that would be inconsistent with established planning documents. Further, this alternative would encourage development to occur within the established UPA. Overall, the impacts of the Carbon Neutral New Development Alternative on land use and planning would be **similar** to the impacts identified in the GPU EIR and **slightly less** than the impacts of the proposed CAP.

MINERAL RESOURCES

Like the project, the Carbon Neutral New Development Alternative would cause no new significant impacts and no substantial increase in the severity of a significant impact on mineral resources than was disclosed in the GPU EIR. As described for the proposed CAP, implementation of the Carbon Neutral New Development Alternative could result in the construction of EV infrastructure, transit access improvements, pedestrian network facilities, bicycle network facilities, improvements to travel connectivity, infill development, and improvements to sewage and solid-waste management infrastructure within the County. These activities would be consistent with General Plan Policies CO-

38 and CO-44. The CAP would not amend, revise, or be inconsistent with any existing regulations related to mineral resources. Requiring carbon neutral development for UPA and/or USB expansions would not affect potential for impacts to mineral resources because the same areas would be potentially developed. Overall, the impacts of the Carbon Neutral New Development Alternative on mineral resources would be **similar** to the impacts identified in the GPU EIR.

NOISE

Like the project, the Carbon Neutral New Development Alternative would cause no new significant impacts and no substantial increase in the severity of a significant impact on noise than was disclosed in the GPU EIR. As described for implementation of the proposed CAP, the Carbon Neutral New Development Alternative could result in short-term noise impacts due to the use of heavy-duty construction equipment, worker vehicle trips, and truck hauling trips. However, the construction of infrastructure and development associated with implementation of the CAP would be consistent with the type and scale of construction considered in the GPU EIR and would be exempt from maximum noise level requirements provided associated construction activities do not take place during the specified hours set forth in County Code Section 6.68.090(e), limiting the level of noise exposure to surrounding sensitive receptors.

The Carbon Neutral New Development Alternative would not result in the development of substantial stationary or transportation noise sources. Further, the GPU EIR contemplates long-term operational noise sources associated with increased vehicle noise and the Carbon Neutral New Development Alternative would not result in a more severe impact compared to what was evaluated in the GPU EIR. Additionally, implementation of the Carbon Neutral New Development Alternative would not result in increased exposure of people residing or working in the project area to excessive noise levels because any development would be required to demonstrate consistency with the airport land use compatibility plan that include policies and regulations to address airport noise. Requiring carbon neutral development for UPA expansions would not affect potential for noise impacts because the same types of development and construction activities would occur. Overall, the impacts of the Carbon Neutral New Development Alternative on noise would be **similar** to the impacts identified in the GPU EIR.

POPULATION AND HOUSING

Like the project, the Carbon Neutral New Development Alternative would cause no new significant impacts and no substantial increase in the severity of a significant impact on population and housing than was disclosed in the GPU EIR. Implementation of the Carbon Neutral New Development Alternative would not induce population growth, because the GHG reduction measures do not propose new housing, nor do they propose changes to policies or regulations related to land use or residential zoning. Requiring carbon neutral development for UPA and/or USB expansions would not substantially change the potential for impacts related to unplanned population growth or displacement of housing. Overall, the impacts of the Carbon Neutral New Development Alternative on population and housing would be **similar** to the impacts identified in the GPU EIR.

PUBLIC SERVICES

Like the project, the Carbon Neutral New Development Alternative would cause no new significant impacts and no substantial increase in the severity of a significant impact on public services than was disclosed in the GPU EIR. Implementation of the Carbon Neutral New Development Alternative would not directly affect the provision of public services, nor contribute to population growth that could result in an increase in demand for fire protection and emergency services. Implementation of the Carbon Neutral New Development Alternative would not result in facilities that would be substantially different or in areas that are different from those identified in the General Plan. Overall, the impacts of the Carbon Neutral New Development Alternative on public services would be **similar** to the impacts identified in the GPU EIR.

RECREATION

Like the project, the Carbon Neutral New Development Alternative would cause no new significant impacts and no substantial increase in the severity of a significant impact on recreation than was disclosed in the GPU EIR. Implementation of the Carbon Neutral New Development Alternative would not directly affect the provision of park and recreation facilities, nor contribute to population growth that could increase the use of existing park and recreation facilities resulting in the physical deterioration of such facilities. Overall, the impacts of the Carbon Neutral New Development Alternative on recreation would be **similar** to the impacts identified in the GPU EIR.

TRANSPORTATION

Like the project, the Carbon Neutral New Development Alternative would cause no new significant impacts and no substantial increase in the severity of a significant impact on transportation than was disclosed in the GPU EIR. The Carbon Neutral New Development Alternative would include the same GHG reduction measures as the proposed CAP, including those intended to reduce VMT. As described for the CAP, subsequent development projects would be subject to all applicable County guidelines, standards, and specifications related to transit, bicycle, or pedestrian facilities. To achieve carbon neutrality, new development outside of the UPA and/or USB would include additional measures, which could include additional investments in transportation infrastructure to further reduce VMT. Due to this requirement, it is anticipated that, overall, the impacts of the Carbon Neutral New Development Alternative on transportation would be **similar** to the impacts identified in the GPU EIR and could result in **slightly less** impacts than the CAP.

UTILITIES AND SERVICE SYSTEMS

Like the project, the Carbon Neutral New Development Alternative would cause no new significant impact and no substantial increase in the severity of a significant impact on utilities and service systems than was disclosed in the GPU EIR. Implementation of the Carbon Neutral New Development Alternative would not result in the relocation or construction of new or expanded utility services systems because implementation of GHG reduction measures would not involve development of residential communities or other similar types of development or induce population growth in an area that would increase demand for expanded utility services. As discussed for the proposed CAP,

proposed measures would also improve water efficiency by formally adopting a water reduction target for new and existing buildings and replacing water-wasting equipment. In addition, implementation of the GHG reduction measures would promote clean energy and sustainable resource management by supporting future EV infrastructure, transit access improvements, and solar for county buildings. To achieve carbon neutrality, new development outside of the UPA and/or USB would include additional measures to further reduce GHG emissions. This could result in reduced demand for utilities and service systems for new development. Overall, the impacts of the Carbon Neutral New Development Alternative on utilities and service systems would be **similar** to the impacts identified in the GPU EIR and could be **slightly less** than the impacts of the CAP.

WILDFIRE

Like the project, the Carbon Neutral New Development Alternative would cause no new significant impact and no substantial increase in the severity of a significant impact on wildfire than was disclosed in the GPU EIR. The Carbon Neutral New Development Alternative includes the same GHG reduction and resilience measures as the CAP, plus an additional measure that would require proposed new development outside of the UPA and/or USB to demonstrate carbon neutrality. Requiring carbon neutral development for UPA and/or USB expansions would not affect potential for wildfire impacts. Overall, the impacts of the Carbon Neutral New Development Alternative on wildfire would be **similar** to the impacts identified in the GPU EIR.

3.5 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

The CEQA Guidelines define the *environmentally superior alternative* as that alternative with the least adverse impacts on the project area and its surrounding environment. For this project, the No Project Alternative is considered the environmentally superior alternative for CEQA purposes because it would avoid all impacts of implementing CAP measures and actions. However, the No Project Alternative would result in greater contributions to climate change from GHG emissions and would fail to meet the basic objectives of the project. Additionally, selection of the No Project Alternative would not realize any of the co-benefits identified in the CAP to sectors such as transportation and air quality. Because the environmentally superior alternative is the No Project Alternative, consistent with CEQA Guidelines section 15126.6(e)(2), the EIR also must identify an environmentally superior alternative from among the other alternatives.

For purposes of this Draft SEIR, the Carbon Neutral New Development Alternative is considered the environmentally superior alternative for CEQA purposes because overall, the impacts of the Carbon Neutral New Development Alternative would be **similar** to the impacts identified in the GPU EIR and could be **slightly less** than the impacts of the CAP for five resource areas: air quality, energy, land use and planning, transportation, and utilities and service systems. Although General Plan amendment(s) would be required for any development outside the USB and UPA and neither the General Plan nor the CAP permit growth in these areas without subsequent evaluation

and approvals, the GPU EIR provides preliminary analysis of new growth areas and the CAP projects all reasonable growth. Therefore, an alternative that increases the GHG emissions reductions requirements for select areas of new growth may result in greater emissions reductions than forecast for the CAP, as proposed, and would further advance the objectives of the CAP.

It should be noted that the Carbon Neutral New Development Alternative does have some drawbacks compared to the project. For example, achieving zero net GHG emissions at the project level is challenging and can be more expensive compared to an equivalent project which is not required to achieve zero GHG emissions. Although technology is rapidly advancing, zero-emission technologies such as ZEVs and all-electric homes are often more expensive to purchase, construct, and operate in certain markets and climates. Project developers would likely have to pay a premium compared to projects that do not need an USB/UPA for zero-carbon technologies and additional reductions, including for offsite GHG reduction projects and/or the purchase of voluntary GHG offset credits, if proposed at the project-level. These higher development costs may make such developments less competitive in the real estate market compared to projects within the USB/UPA that don't have to achieve zero net GHG emissions. Such cost premiums may also be passed down to future tenants and residents, potentially making cost of living and doing business higher.

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4 AIR QUALITY

4.1 INTRODUCTION

This chapter discusses existing air quality conditions, summarizes applicable regulations, and analyzes potential short-term and long-term air quality impacts that could result from implementation of the project. Because this analysis is a subsequent EIR (SEIR) to Sacramento County's certified GPU EIR, the evaluation of impacts focuses on the potential for implementation of the CAP to result in new or substantially more severe impacts than presented in the GPU EIR, given the effects of implementing the CAP and changes in environmental and regulatory conditions that have occurred since certification of the GPU EIR. This chapter incorporates by reference the air quality setting and impact analysis from the GPU EIR as it applies to the CAP and supplements that analysis with relevant setting conditions that have changed since certification of the GPU EIR.

Scoping comments pertaining to air quality were received during the notice of preparation (NOP) public review period. These comments requested discussion regarding potential secondary impacts on air quality from foreseeable emissions of priority pollutants by traffic that would be induced by the CAP. Transportation-related emissions are addressed below. See Chapter 8, "Transportation," of this SEIR for a discussion of the CAP's potential to increase vehicle travel. See Appendix A for all NOP comments received.

4.2 ENVIRONMENTAL SETTING

The environmental setting described in GPU EIR Chapter 11, "Air Quality" (pages 11-1 to 11-16), remains applicable to this analysis and is incorporated by reference. The following discussion summarizes the information in the GPU EIR and includes supplemental information about existing conditions to capture updates since the adoption of the GPU EIR or to add information that was not included in the GPU EIR.

4.2.1 CRITERIA AIR POLLUTANTS

Concentrations of emissions from criteria air pollutants are used to indicate the quality of the ambient air. A brief description of key criteria air pollutants in the Sacramento Valley Air Basin (SVAB) and their health effects is provided below.

Criteria air pollutants include ozone, carbon monoxide (CO), nitrogen dioxide (NO₂), sulfur dioxide (SO₂), particulate matter 10 micrometers or less in diameter (PM₁₀), particulate matter 2.5 micrometers or less in diameter (PM_{2.5}), and lead, as well as other pollutants, such as hydrogen sulfide and sulfates. However, for the purposes of this analysis, the criteria air pollutants of primary concern, because of their nonattainment status, are ozone (and ozone precursors) and particulate matter. Sacramento County's

attainment status under the California ambient air quality standards (CAAQS) and national ambient air quality standards (NAAQS) is shown in Table 4-2 below under “Regulatory Setting.”

OZONE

Ozone is a photochemical oxidant (a substance whose oxygen combines chemically with another substance in the presence of sunlight) and the primary component of smog. Ozone is not directly emitted into the air but is formed through complex chemical reactions between precursor emissions of reactive organic compounds (ROG) and oxides of nitrogen (NO_x) in the presence of sunlight.

ROG are volatile organic compounds (VOCs) that are photochemically reactive. For the purposes of CEQA analyses, the terms “ROG” and “VOCs” are used interchangeably and represent the same group of emissions. ROG emissions result primarily from incomplete combustion and the evaporation of chemical solvents and fuels. NO_x are a group of gaseous compounds of nitrogen and oxygen that result from the combustion of fuels. Emissions of the ozone precursors ROG and NO_x have decreased over the past several years because of more stringent motor vehicle standards and cleaner burning fuels. Emissions of ROG and NO_x decreased from 2000 to 2010 and are projected to continue decreasing from 2010 to 2035 (CARB 2013).

Acute health effects of ozone exposure include increased respiratory and pulmonary resistance, cough, pain, shortness of breath, and lung inflammation. Chronic health effects include permeability of respiratory epithelia and possibility of permanent lung impairment (EPA 2023).

NITROGEN DIOXIDE

NO₂ is a brownish, highly reactive gas that is present in all urban environments. The major human-made sources of NO₂ are combustion devices, such as boilers, gas turbines, and mobile and stationary reciprocating internal combustion engines. Combustion devices emit primarily nitric oxide (NO), which reacts through oxidation in the atmosphere to form NO₂. The combined emissions of NO and NO₂ are referred to as NO_x and are reported as equivalent NO₂. Because NO₂ is formed and depleted by reactions associated with photochemical smog (ozone), the NO₂ concentration in a geographical area may not be representative of the local sources of NO_x emissions (EPA 2023).

Acute health effects of exposure to NO_x include coughing, difficulty breathing, vomiting, headache, eye irritation, chemical pneumonitis, or pulmonary edema, breathing abnormalities, cough, cyanosis, chest pain, rapid heartbeat, and death. Chronic health effects include chronic bronchitis and decreased lung function (EPA 2023).

CARBON MONOXIDE

CO is a colorless, odorless gas that can be harmful when inhaled in large amounts. CO is released when something is burned. The greatest sources of CO to outdoor air are cars, trucks, and other vehicles or machinery that burn fossil fuels. A variety of items in

a home, such as unvented kerosene and gas space heaters, leaking chimneys and furnaces, and gas stoves, also release CO and can affect air quality indoors. Acute health effects include headache, dizziness, fatigue, nausea, and vomiting, while chronic health effects include permanent heart and brain damage.

PARTICULATE MATTER

PM₁₀ consists of particulate matter emitted directly into the air, such as fugitive dust, soot, smoke from mobile and stationary sources, construction operations, fires and natural windblown dust, and particulate matter formed in the atmosphere by reaction of gaseous precursors (CARB 2013). PM₁₀ emissions in the SVAB are dominated by emissions from area sources, primarily fugitive dust from vehicle travel on unpaved and paved roads, farming operations, construction and demolition, and particles from residential fuel combustion. PM₁₀ emissions are projected to decrease from 2000 to 2035 because of reduced areawide source emissions (CARB 2013).

PM₁₀ pollution can result in damage to vegetation and is often responsible for much of the haze regarded as smog. In addition, controlled human exposure studies have shown that exposure to elevated levels of PM₁₀ causes adverse health effects, especially related to the inhibition of lung functions and an increase in respiratory and cardiovascular afflictions, as well as cancer risks. PM₁₀ causes a greater health risk than larger particles because fine particles are too small for the natural filtering process of the human body and can more easily penetrate the defenses of the human respiratory system. Individuals with preexisting respiratory or cardiovascular disease are especially susceptible to the adverse effects of PM₁₀ exposure, as are asthmatic children and the elderly. Children exposed to high concentrations of PM₁₀ for prolonged periods exhibit decreased immune function as well. Additionally, associations between long-term exposure to PM₁₀ and adverse cognitive effects, such as faster cognitive decline, including memory and attention span loss, are being further examined by health researchers.

Direct emissions of PM_{2.5} in the SVAB declined steadily between 2000 and 2010 but are projected to increase very slightly through 2035. Emissions of PM_{2.5} in the SVAB are dominated by the same sources as emissions of PM₁₀ (CARB 2013). Because PM_{2.5} is smaller than PM₁₀, it can more deeply penetrate the human body through inhalation, allowing many chemicals harmful to human health to be carried to internal organs. Long-term exposure to these particulates can increase the chance of chronic respiratory disease and cause lung damage and irregular heartbeat. Short-term exposure can aggravate respiratory illnesses such as bronchitis and asthma and cause heart attacks and arrhythmias in people with heart disease. Additionally, an estimated 9,000 people die prematurely each year in California because of PM_{2.5} exposure (CARB 2013). A safe threshold for PM_{2.5} has not been established and research indicates that health effects occur at low concentrations.

4.2.2 EXISTING AIR QUALITY CONDITIONS

CRITERIA AIR POLLUTANTS

The Sacramento Metropolitan Area is a federal ozone non-attainment area and one of the top 10 worst air quality areas nationally. In Sacramento County, the pollutants of greatest concern are ozone precursors (hydrocarbons and NO₂), CO, PM₁₀, and PM_{2.5}. Table 4-2 shows Sacramento County's attainment and nonattainment status relative to the NAAQS and CAAQS for criteria air pollutants.

The Sacramento Federal Nonattainment Area (SFNA) for ozone is composed of five air districts in the southern portion of the SVAB. The SFNA air districts include all of Sacramento and Yolo counties and portions of El Dorado, Placer, Sutter, and Solano counties. Except for the ozone and particulate matter standards, this area is in attainment for all CAAQS and NAAQS. The SFNA is designated a "severe" nonattainment area for the eight-hour NAAQS for ozone. As a part of the SFNA, Sacramento County is in nonattainment for the eight-hour NAAQS and the one-hour CAAQS for ozone. With respect to particulate matter, Sacramento County is designated as nonattainment for the federal PM_{2.5} 24-hour standard, the State PM₁₀ 24-hour standard and annual mean standard, and the State PM_{2.5} annual standard.

NAAQS and CAAQS establish the concentration above which a pollutant is known to cause adverse health effects to sensitive groups within the population, such as children and the elderly. Because these standards have been established for specific pollutants using health-based criteria, the pollutants for which standards have been set are known as "criteria" pollutants. For some of the criteria air pollutants, the State standards are more stringent than the federal standards. The standards differ because of variations in health studies and interpretations involved in the standard-setting process.

A given pollutant's concentration in the atmosphere is a result of the amount of pollution released and the atmosphere's ability to transport and dilute the pollutants. Factors affecting transport and dilution include terrain, wind, atmospheric stability, and, for photochemical pollutants, sunlight. Sacramento's poor air quality can be attributed to emissions, geography, and meteorology.

TOXIC AIR CONTAMINANTS

According to the California Air Resources Board's (CARB's) *California Almanac of Emissions and Air Quality—2013 Edition*, most of the estimated health risks from toxic air contaminants (TACs) can be attributed to relatively few compounds, the most important being diesel particulate matter (diesel PM) (CARB 2013). Diesel PM differs from other TACs in that it is not a single substance, but a complex mixture of hundreds of substances. Although diesel PM is emitted by diesel-fueled internal combustion engines, the composition of the emissions varies depending on engine type, operating conditions, fuel composition, lubricating oil, and whether an emissions control system is being used. Unlike the other TACs, no ambient monitoring data are available for diesel PM because no routine measurement method currently exists. However, CARB has made preliminary concentration estimates based on a PM exposure method. This method uses the CARB emissions inventory's PM₁₀ database, ambient PM₁₀ monitoring

data, and the results from several studies to estimate concentrations of diesel PM. In addition to diesel PM, TACs for which data are available that pose the greatest existing ambient risk in California are benzene, 1,3-butadiene, acetaldehyde, carbon tetrachloride, hexavalent chromium, para-dichlorobenzene, formaldehyde, methylene chloride, and perchloroethylene. Gasoline combustion in automobiles is a common source of emissions of several of these TACs.

Of these TACs, diesel PM poses the greatest health risk. Based on receptor modeling techniques, CARB estimated its health risk to be 360 excess cancer cases per million people in the SVAB in the year 2000. Since 1990, the health risk associated with diesel PM has been reduced by 52 percent. Overall, levels of most TACs, except para-dichlorobenzene and formaldehyde, have decreased since 1990 (CARB 2013).

ODORS

Odors are regarded as an annoyance rather than a health hazard. However, manifestations of a person's reaction to foul odors can range from psychological (e.g., irritation, anger, or anxiety) to physiological (e.g., circulatory and respiratory effects, nausea, vomiting, and headache). The ability to detect odors varies considerably among the population and overall is quite subjective. Some individuals can smell minute quantities of specific substances; others may not have the same sensitivity but may have sensitivities to odors of other substances. In addition, people may have different reactions to the same odor; an odor that is offensive to one person may be perfectly acceptable to another (e.g., fast food restaurant).

It is important to also note that an unfamiliar odor is more easily detected and is more likely to cause complaints than a familiar one. This is because of the phenomenon known as odor fatigue, in which a person can become desensitized to almost any odor and recognition only occurs with an alteration in the intensity. According to the Sacramento Metropolitan Air Quality Management District (SMAQMD), land uses typically associated with the generation of nuisance odors include wastewater conveyance and wastewater treatment plants, municipal solid waste landfills and trash transfer stations, composting facilities, animal agriculture and processing, rendering facilities and roadkill collection, chemical and petroleum industries, and cannabis cultivation (SMAQMD 2019). These sources of odors are found throughout Sacramento County.

SENSITIVE LAND USES

Sensitive receptors are considered to include those land uses where exposure to pollutants could result in health-related risks to sensitive individuals, such as children or the elderly. Residential dwellings, schools, hospitals, playgrounds, and similar facilities are of primary concern because of the presence of individuals particularly sensitive to pollutants and/or the potential for increased and prolonged exposure to pollutants. Existing sensitive receptors are scattered throughout unincorporated Sacramento County.

4.3 REGULATORY SETTING

Air quality in Sacramento County is regulated by several agencies, including the U.S. Environmental Protection Agency (EPA), CARB, and SMAQMD. Each of these agencies develops rules and/or regulations to attain the goals or directives imposed upon them through legislation. Although EPA regulations may not be superseded, both State and local regulations may be more stringent. In general, air quality is evaluated based upon standards developed by federal and State agencies.

The regulatory setting described on pages 11-16 through 11-30 of the GPU EIR is incorporated by reference. Applicable federal, State, and local regulations that have seen changes or updates since the adoption of the GPU EIR or those that were not included in the GPU EIR are described below.

4.3.1 FEDERAL

AMBIENT AIR QUALITY STANDARDS

The NAAQS and CAAQS are summarized in Table 4-1. Notably, on October 1, 2015, EPA lowered the national eight-hour standard from 0.075 part per million (ppm) to 0.070 ppm. Additionally, on February 7, 2024, EPA announced a final rule to strengthen the NAAQS for PM_{2.5}. EPA lowered the primary (health-based) annual PM_{2.5} standard to 9.0 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$) to reflect more robust scientific understanding related to exposure by particle pollution and the associated adverse health effects from PM_{2.5} inhalation (EPA 2024a).

Table 4-1: National and California Ambient Air Quality Standards

Pollutant	Averaging Time	National (NAAQS) ^c		California (CAAQS) ^{a,e}
		Primary ^{a,c}	Secondary ^{a,d}	
Ozone	1-hour	— ^e	Same as primary standard	0.09 ppm (180 $\mu\text{g}/\text{m}^3$)
	8-hour	0.070 ppm (147 $\mu\text{g}/\text{m}^3$)		0.070 ppm (137 $\mu\text{g}/\text{m}^3$)
Carbon monoxide (CO)	1-hour	35 ppm (40 mg/m^3)	Same as primary standard	20 ppm (23 mg/m^3)
	8-hour	9 ppm (10 mg/m^3)		9 ppm ^f (10 mg/m^3)
Nitrogen dioxide (NO ₂)	Annual arithmetic mean	53 ppb (100 $\mu\text{g}/\text{m}^3$)	Same as primary standard	0.030 ppm (57 $\mu\text{g}/\text{m}^3$)
	1-hour	100 ppb (188 $\mu\text{g}/\text{m}^3$)	—	0.18 ppm (339 $\mu\text{g}/\text{m}^3$)
Sulfur dioxide (SO ₂)	24-hour	—	—	0.04 ppm (105 $\mu\text{g}/\text{m}^3$)
	3-hour	—	0.5 ppm (1300 $\mu\text{g}/\text{m}^3$)	—
	1-hour	75 ppb (196 $\mu\text{g}/\text{m}^3$)	—	0.25 ppm (655 $\mu\text{g}/\text{m}^3$)
Respirable particulate matter (PM ₁₀)	Annual arithmetic mean	—	Same as primary standard	20 $\mu\text{g}/\text{m}^3$
	24-hour	150 $\mu\text{g}/\text{m}^3$		50 $\mu\text{g}/\text{m}^3$
Fine particulate matter (PM _{2.5})	Annual arithmetic mean	9.0 $\mu\text{g}/\text{m}^3$	15.0 $\mu\text{g}/\text{m}^3$	12 $\mu\text{g}/\text{m}^3$
	24-hour	35 $\mu\text{g}/\text{m}^3$	Same as primary standard	—

Pollutant	Averaging Time	National (NAAQS) ^c		California (CAAQS) ^{a,e}
		Primary ^{a,c}	Secondary ^{a,d}	
Lead ^f	Calendar quarter	1.5 µg/m ³	Same as primary standard	—
	30-Day average	—	—	1.5 µg/m ³
	Rolling 3-Month Average	0.15 µg/m ³	Same as primary standard	—
Hydrogen sulfide ^f	1-hour	No national standards		0.03 ppm (42 µg/m ³)
Sulfates ^f	24-hour			25 µg/m ³
Vinyl chloride ^{f,g}	24-hour			0.01 ppm (26 µg/m ³)
Visibility-reducing particulate matter ^f	8-hour			Extinction of 0.23 per km

Notes: µg/m³ = micrograms per cubic meter; km = kilometers; mg/m³ = milligrams per cubic meter; ppb = parts per billion; ppm = parts per million.

- a Concentration expressed first in units in which it was promulgated. Equivalent units given in parentheses are based on a reference temperature of 25 degrees Celsius (°C) and a reference pressure of 760 torr. Most measurements of air quality are to be corrected to a reference temperature of 25°C and a reference pressure of 760 torr; ppm in this table refers to ppm by volume, or micromoles of pollutant per mole of gas.
- b National standards (other than ozone, particulate matter, and those based on annual averages or annual arithmetic means) are not to be exceeded more than once a year. The ozone standard is attained when the fourth highest 8-hour concentration in a year, averaged over 3 years, is equal to or less than the standard. The PM₁₀ 24-hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above 150 µg/m³ is equal to or less than one. The PM_{2.5} 24-hour standard is attained when 98 percent of the daily concentrations, averaged over 3 years, are equal to or less than the standard. Contact the U.S. Environmental Protection Agency for further clarification and current federal policies.
- c National primary standards: The levels of air quality necessary, with an adequate margin of safety to protect public health.
- d National secondary standards: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.
- e California standards for ozone, carbon monoxide, SO₂ (1- and 24-hour), NO₂, particulate matter, and visibility-reducing particles are values that are not to be exceeded. All others are not to be equaled or exceeded. California ambient air quality standards are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations.
- f Although California identifies hydrogen sulfide, sulfates, vinyl chloride, and visibility-reducing particles as criteria pollutants, these pollutants are not of concern for this project.
- g The California Air Resources Board has identified lead and vinyl chloride as toxic air contaminants with no threshold of exposure for adverse health effects determined. These actions allow for the implementation of control measures at levels below the ambient concentrations specified for these pollutants.

Sources: CARB 2016, 2024; EPA 2024a.

ATTAINMENT STATUS AND STATE IMPLEMENTATION PLAN

Sacramento County does not attain the following federal and state ambient air quality standards as of the writing of this document: 24-hour federal standards for PM_{2.5}, eight-hour federal and State ozone standards, one-hour State ozone standard, and 24-hour and annual State standards for PM₁₀ (Table 4-2).

Table 4-2: Sacramento County Attainment Status

Pollutant	National Ambient Air Quality Standard	California Ambient Air Quality Standard
Ozone	Attainment (1-hour) ¹	Nonattainment (1-hour) Classification–Serious ²
	Nonattainment (8-hour) ³ Classification–Severe-15	Nonattainment (8-hour)

Pollutant	National Ambient Air Quality Standard	California Ambient Air Quality Standard
	Nonattainment (8-hour) ⁴ Classification– Serious	Nonattainment (8-hour)
Respirable particulate matter (PM ₁₀)	Attainment (24-hour)	Nonattainment (24-hour)
	Attainment (24-hour)	Nonattainment (Annual)
Fine particulate matter (PM _{2.5})	Nonattainment (24-hour)	(No State Standard for 24-Hour)
	Attainment (Annual)	Attainment (Annual)
Carbon monoxide (CO)	Attainment (1-hour)	Attainment (1-hour)
	Attainment (8-hour)	Attainment (8-hour)
Nitrogen dioxide (NO ₂)	Unclassified/Attainment (1-hour)	Attainment (1-hour)
	Unclassified/Attainment (Annual)	Attainment (Annual)
Sulfur dioxide (SO ₂) ⁵	(Attainment Pending) (1-Hour)	Attainment (1-hour)
	(Attainment Pending) (1-Hour)	Attainment (24-hour)
Lead (Particulate)	Attainment (3-month rolling average)	Attainment (30-day average)
Hydrogen Sulfide	No Federal Standard	Unclassified (1-hour)
Sulfates		Attainment (24-hour)
Visibly Reducing Particles		Unclassified (8-hour)
Vinyl Chloride		Unclassified (24-hour)

¹ Air quality meets federal 1-hour ozone standard (77 *Federal Register* 64036, October 18, 2012). The U.S. Environmental Protection Agency (EPA) revoked this standard, but some associated requirements still apply. The Sacramento Metropolitan Air Quality Management District (SMAQMD) attained the standard in 2009. SMAQMD has requested that EPA recognize attainment to fulfill the requirements.

² Per Health and Safety Code Section 40921.5(c), the classification is based on 1989–1991 data, and therefore does not change.

³ 2008 Standard.

⁴ 2015 Standard.

⁵ 2010 Standard.

Sources: EPA 2024b; CARB 2022a.

Sacramento County was classified as “serious” for nonattainment of the 2015 eight-hour ozone standard. Additionally, in October 2010, SMAQMD prepared the *PM₁₀ Implementation/Maintenance Plan and Redesignation Request for Sacramento County*. EPA approved the PM₁₀ plan, which allowed EPA to proceed with the redesignation of Sacramento County as attainment for the PM₁₀ NAAQS (SMAQMD 2024a).

As described above, criteria air pollutants are compounds that, at certain concentrations, can cause harm to human and animal health and the environment. Extensive scientific and economic research has been conducted to evaluate the specific concentrations at which these pollutants may cause harm to health and the environment. These concentrations are reflected in EPA’s NAAQS, which are shown in Table 4-1. The primary standards protect public health, and the secondary standards protect public welfare. The Clean Air Act (CAA) required each state to prepare a state

implementation plan (SIP) for attaining and maintaining the NAAQS. The federal Clean Air Act Amendments of 1990 added requirements for states with nonattainment areas to revise their SIPs to incorporate additional control measures to reduce air pollution. EPA is responsible for reviewing all SIPs to determine whether they conform to the mandates of the CAA and its amendments and whether implementation will achieve air quality goals. If EPA determines a SIP to be inadequate, it may prepare a federal implementation plan that imposes additional control measures. If an approvable SIP is not submitted or implemented within the mandated time frame, sanctions may be applied to transportation funding and stationary air pollution sources in the air basin.

California's SIP is updated periodically to reflect the latest emissions inventories, planning documents, and rules and regulations of the air basins as reported by their jurisdictional agencies. The 2022 SIP, adopted on September 22, 2022, is the most current SIP and is a compilation of plans and regulations that govern how the region and State will comply with the CAA requirements to attain and maintain the NAAQS for ozone and PM_{2.5}.

4.3.2 STATE

SENATE BILL 1383

In September 2016, Senate Bill (SB) 1383 (Lara, Chapter 395, Statutes of 2016) was signed into law, establishing methane emissions reduction targets in a statewide effort to reduce emissions of short-lived climate pollutants in various sectors of California's economy.

As it pertains to solid waste, SB 1383 establishes targets to achieve a 75 percent reduction in the volume of statewide disposal of organic waste by 2025. The law grants the California Department of Resources Recycling and Recovery the regulatory authority required to achieve the organic waste disposal reduction targets. It established an additional target: not less than 20 percent of currently disposed edible food is to be recovered for human consumption by 2025.

CALIFORNIA GREEN BUILDING STANDARDS CODE (TITLE 24, PART 11)

The California Green Building Standards Code, also known as the CALGreen Code, is a reach code (i.e., set of optional standards that exceed the requirements of mandatory codes) developed by the California Energy Commission that provides green building standards for statewide residential and nonresidential construction. The current version is the 2022 CALGreen Code, which took effect on January 1, 2023. The CALGreen Code sets design requirements equivalent to or more stringent than those of the California Energy Code for energy efficiency, water efficiency, waste diversion, and indoor air quality. These codes are adopted by local agencies that enforce building codes and used as guidelines by State agencies for meeting the requirements of Executive Order B-18-12.

ODOR IMPACT MINIMIZATION PLAN (TITLE 14, SECTION 17863.4)

California Code of Regulations (CCR) Title 14, Section 17863.4 outlines requirements for compostable material handling operations and facilities to prepare, implement, and maintain site-specific odor impact minimization plans. Each odor impact minimization plan includes the following elements:

- A monitoring and data collection protocol for on-site odor sources.
- A description of meteorological conditions that may carry odors to off-site receptors.
- A complaint response and recordkeeping protocol, a description of facilities design considerations and optimal facility operation ranges to minimize odors.
- A description of operating procedures to minimize odors (e.g., aeration, moisture management, and storage practices).

The odor impact minimization plan is utilized by an enforcing agency to determine whether the compostable material handling operations and facilities are properly following the odor-reduction procedure outlined in the plan. If the enforcing agency finds that the odor minimization plan protocols are not being followed, it will require the operator to take corrective actions (14 CCR Section 17863.4).

4.3.3 LOCAL

SACRAMENTO METROPOLITAN AIR QUALITY MANAGEMENT DISTRICT

Chapter 11, "Air Quality," in the GPU EIR discusses 21 SMAQMD rules that address construction-related and operational emissions of criteria air pollutants and TACs. The discussion is general, providing a summary of potential rules that could apply to individual projects. Therefore, although rules may have been updated, they are not repeated here as they do not pertain to this program-level analysis.

SMAQMD adopted the *Guide to Air Quality Assessment in Sacramento County* (CEQA Guide) in December 2009 and has since made multiple revisions. The most recent revisions related to air pollution occurred in October 2020 and pertained to best management practices (BMPs) related to operational emissions of particulate matter. The SMAQMD CEQA Guide provides methods to analyze air quality impacts from plans and projects, including screening criteria, thresholds of significance, calculation methods, and mitigation measures to assist lead agencies in complying with CEQA.

During updates to the SMAQMD CEQA Guide, SMAQMD updated certain CEQA thresholds for air pollutant emissions. The SMAQMD Board of Directors rescinded the 2002 concentration-based thresholds for PM₁₀ and PM_{2.5} and adopted the new mass-emissions PM₁₀ and PM_{2.5} thresholds on May 28, 2015. The TAC thresholds for stationary sources were developed as part of SMAQMD's Assembly Bill (AB) 2588 program. However, the SMAQMD Board of Directors has not yet established a threshold for mobile sources or non-permitted sources of TAC. Nevertheless, it is common practice to use SMAQMD's stationary-source TAC thresholds for land use

emissions mobile sources and non-permitted sources of TACs. SMAQMD mass-emissions thresholds for the construction and operation phases are discussed below.

Because the SVAB is in nonattainment status with respect to ozone, PM₁₀, and PM_{2.5}, the SMAQMD CEQA Guide requires that projects implement a set of Basic Construction Emission Control Practices as BMPs regardless of the significance determination. The CEQA Guide includes guidance on quantifying construction-related emissions and measures to reduce NO_x and visible emissions from off-road diesel-powered equipment, preparation and submission of an off-road construction inventory, and payment of off-site mitigation offset fees if construction emissions exceed SMAQMD construction-threshold levels.

SMAQMD also released final guidance in October 2020 in response to the California Supreme Court decision in *Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502 (referred to as the Friant Ranch Decision). The guidance addresses how to discuss the foreseeable adverse effects of project-generated emissions that exceed the NAAQS and CAAQS for criteria air pollutants and explain the connection between project emissions and deleterious health effects.

MOBILE SOURCES AIR TOXICS PROTOCOL

The Mobile Sources Air Toxics Protocol (MSAT Protocol) provides guidance to local land use jurisdictions on assessing and disclosing potential cancer risk and PM_{2.5} concentrations from major roadways and railways. The SMAQMD Board of Directors approved the MSAT Protocol on January 25, 2018. The MSAT Protocol replaces the Recommended Protocol for the Evaluation of Sensitive Receptors Adjacent to Major Roadways.

APPLICABLE AIR QUALITY PLANS

2020 SACRAMENTO AREA COUNCIL OF GOVERNMENTS METROPOLITAN TRANSPORTATION PLAN/SUSTAINABLE COMMUNITIES STRATEGY

The Sacramento Area Council of Governments (SACOG) is designated by the federal government as the metropolitan planning organization for the Sacramento region. As such, SACOG is required to maintain a regional transportation plan that must be updated every four years in coordination with each local government. The Metropolitan Transportation Plan and Sustainable Communities Strategy (MTP/SCS) is a 20-year multimodal transportation plan that is financially feasible, achieves health standards for clean air, and addresses statewide climate goals. The MTP/SCS land use forecast identifies the general locations of different types of land uses, residential densities, employment intensities, and natural resource areas.

SACOG's 2020 MTP/SCS was adopted on November 18, 2019. In their technical analysis of the 2020 MTP/SCS prepared in 2020, CARB staff accepted SACOG's determination that its 2020 MTP/SCS would meet the target of a 19 percent reduction by 2035, compared to 2005 levels, when fully implemented based on a review of all available evidence and in consideration of CARB's 2019 Evaluation Guidelines (CARB

2020). The goals of the 2020 MTP/SCS are based on the forecasted growth of the area and characterized by an increase in per capita vehicle miles traveled (VMT).

2023 SACRAMENTO REGIONAL 2008 8-HOUR OZONE ATTAINMENT AND FURTHER REASONABLE PROGRESS PLAN

At a public meeting held on October 26, 2023, CARB voted to approve the Sacramento Regional 70 Parts per Billion (ppb) 8-Hour Ozone Attainment and Reasonable Further Progress Plan. The Sacramento Regional 70 ppb 8-Hour Ozone Attainment and Reasonable Further Progress Plan was prepared by the five local air districts of the SFNA with the support of CARB. SFNA requested a reclassification to “severe” with an attainment deadline of August 3, 2033. The 2023 Sacramento Regional Plan for the 2015 70 ppb 8-Hour Ozone Standard addresses the CAA requirements associated with the “severe” classification and discusses how the SFNA can attain the standard by the attainment date. The Sacramento Regional 70 ppb 8-Hour Ozone Attainment and Reasonable Further Progress Plan is an air quality attainment plan that is applicable to development in the county.

SACRAMENTO COUNTY GENERAL PLAN UPDATE

The General Plan contains the following policies from the Air Quality Element that are applicable to the CAP:

- AQ-2.** Support Regional Transit’s efforts to secure adequate funding so that transit is a viable transportation alternative. Development shall pay its fair share of the cost of transit facilities required to serve the project.
- AQ-3.** Buffers and/or other appropriate exposure reduction measures shall be established on a project-by-project basis and incorporated during review to provide for protection of sensitive receptors from sources of air pollution or odor. CARB’s “Strategies to Reduce Air Pollution Exposure Near High Volume Roadways” Technical Advisory and the AQMD’s [SMAQMD’s] “Mobile Sources Air Toxics Protocol” or applicable AQMD guidance shall be utilized when establishing these exposure reduction measures.
- AQ-4.** Developments which meet or exceed thresholds of significance for ozone precursor pollutants, and/or GHGs [greenhouse gases] as adopted by SMAQMD, shall be deemed to have a significant environmental impact. An Air Quality Mitigation Plan and/or a Greenhouse Gas Reduction Plan shall be submitted to the County of Sacramento prior to project approval, subject to review and recommendation as to technical adequacy by the Sacramento Metropolitan Air Quality Management District.
- AQ-5.** Reduce emissions associated with VMT and evaporation by reducing the surface area dedicated to parking facilities; reduce vehicle emissions associated with “hunting” for on-street parking by implementing innovative parking solutions including shared parking, elimination of minimum parking requirements, creation of maximum parking requirements, and utilize

performance pricing for publicly owned parking spaces both on- and off-street, as well as creating parking benefit districts.

- AQ-6.** Provide incentives for the use of transportation alternatives, including a program for the provision of financial incentives for builders that construct ownership housing within a quarter mile of existing and proposed light rail stations.
- AQ-9.** When park-and-ride facilities are requested by transit providers, the spaces provided for the park-and-ride facility may be counted as part of the total amount of parking required by the zoning code.
- AQ-11.** Encourage contractors operating in the county to procure and to operate low-emission vehicles, and to seek low emission fleet status for their off-road equipment.
- AQ-12.** Minimize air pollutant emissions from Sacramento County facilities and operations.
- AQ-13.** Use California State Air Resources Board (ARB) and SMAQMD guidelines for Sacramento County facilities and operations to comply with mandated measures to reduce emissions from fuel consumption, energy consumption, surface coating operations, and solvent usage.
- AQ-14.** Support SMAQMD's development of improved ambient air quality monitoring capabilities and the establishment of standards, thresholds and rules to more adequately address the air quality impacts of plans and proposals proposed by the County.
- AQ-16.** Prohibit the idling of on-and off-road engines when the vehicle is not moving or when the off-road equipment is not performing work for a period of time greater than five minutes in any one-hour period.
- AQ-17.** Promote optimal air quality benefits through energy conservation measures in new development.
- AQ-19.** Require all feasible reductions in emissions for the operation of construction vehicles and equipment on major land development and roadway construction projects.
- AQ-20.** Promote Cool Community strategies to cool the urban heat island, reduce energy use and ozone formation, and maximize air quality benefits by encouraging four main strategies including, but not limited to: plant trees, selective use of vegetation for landscaping, install cool roofing, and install cool pavements.
- AQ-21.** Support SMAQMD's particulate matter control measures for residential wood burning and fugitive dust.

4.4 SIGNIFICANCE CRITERIA AND METHODOLOGY

4.4.1 SIGNIFICANCE CRITERIA

The project would result in an impact related to air quality if it would:

- conflict with or obstruct implementation of the applicable air quality plan;
- result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or State ambient air quality standard;
- expose sensitive receptors to substantial pollutant concentrations; or
- result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

4.4.2 METHODOLOGY

The CAP is a policy document and does not propose any specific future projects. As described in Chapter 1, “Introduction,” this SEIR considers the broad environmental implications of implementing the CAP on a conceptual basis and does not provide a project-level assessment. As a result, no emissions calculations were performed for the types of projects that could be required to facilitate the CAP. This analysis assumes that the California Emissions Estimator Model (CalEEMod), or a successor model that is approved for use for CEQA air quality analyses by SMAQMD, would be used to calculate construction-related and operational emissions before any such project would be allowed to proceed.

Impacts on air quality were analyzed qualitatively based on a review of the CAP measures and actions and their potential to result in direct and indirect physical changes to the environment if the CAP is approved and implemented. Each issue area was analyzed in the context of existing laws and regulations, as well as policies adopted in the General Plan, and the extent to which these existing regulations and policies adequately address and minimize the potential for impacts associated with implementation of the CAP. The impact analysis focuses on whether approval and implementation of the CAP would result in new or more severe air quality impacts than what would occur with implementation of the General Plan. Because future projects that would be implemented under the CAP have yet to be specifically defined, this SEIR considers the types of impacts that could occur with implementation of proposed CAP GHG reduction measures and actions. Future projects would be evaluated by the County to determine whether they are within the scope of this SEIR or whether they would result in project-specific impacts beyond what is concluded in this analysis. If future projects would result in additional impacts, subsequent CEQA documentation would be required to evaluate the impacts, determine mitigation, and conclude whether impacts would be reduced to a less-than-significant level.

At the programmatic level, it is not possible to estimate the exact emissions from construction and operation of individual projects under the CAP. Additionally, details

such as individual project location, scale, construction phasing, and exact equipment types and numbers are not known at this level of analysis. Therefore, this analysis uses a qualitative approach to determine whether implementation of the CAP could result in air quality impacts based on the criteria set forth in Appendix G of the CEQA Guidelines and the SMAQMD thresholds of significance outlined in the SMAQMD CEQA Guide.

SMAQMD's air quality thresholds of significance are tied to achieving or maintaining attainment designations with the NAAQS and CAAQS, which are scientifically substantiated, numerical concentrations of criteria air pollutants considered to be protective of human health. Implementing the CAP would have a significant impact related to air quality such that human health would be adversely affected if it would do any of the following (SMAQMD 2020):

- Cause construction-generated emissions of criteria air pollutants or precursors that would exceed the SMAQMD-recommended thresholds of 85 pounds per day (lb/day) for NO_x, 80 lb/day or 13.2 tons per year (tpy) for PM₁₀, and 82 lb/day or 15 tpy for PM_{2.5} after SMAQMD's Basic Construction Emission Control Practices have been implemented.
- Result in a net increase in long-term operational emissions of criteria air pollutants or precursors that would exceed the SMAQMD-recommended thresholds of 65 lb/day for ROG and NO_x, 80 lb/day or 13.2 tpy for PM₁₀, and 82 lb/day or 15 tpy for PM_{2.5} after SMAQMD's best available control technology and operational BMPs have been applied.
- Result in short-term construction and long-term operational local emissions of CO by mobile sources that would violate or contribute substantially to concentrations exceeding the one-hour CAAQS of 20 ppm or the eight-hour CAAQS of 9 ppm.
- Expose any off-site sensitive receptor to a substantial incremental increase in TAC emissions exceeding 10 in 1 million for carcinogenic risk (the risk of contracting cancer) and/or a noncarcinogenic hazard index of 1.0 or greater.
- Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

Because this SEIR tiers from the GPU EIR, all relevant adopted General Plan policies and GPU EIR mitigation measures have been applied to the project as needed to avoid or minimize project impacts and are considered part of the proposed CAP.

4.5 IMPACTS AND ANALYSIS

4.5.1 IMPACT AQ-1: RESULT IN INCONSISTENCY WITH AN APPLICABLE AIR QUALITY PLAN

GENERAL PLAN UPDATE EIR DETERMINATION

Impacts related to air quality plans are discussed in Chapter 11, “Air Quality,” on pages 11-77 and 11-78 of the GPU EIR. The GPU EIR determined that the proposed General Plan would be inconsistent with the land use assumptions of the SIP because the excess capacity proposed in the General Plan was not considered in the SIP’s growth assumptions and would therefore result in more air quality impacts than planned for in the SIP. Additionally, implementation of the General Plan will result in air pollutant emissions exceeding SMAQMD’s thresholds, which conflicts with the goals of the SIP. This impact was determined to be ***significant and unavoidable***.

PROPOSED CLIMATE ACTION PLAN IMPACT ANALYSIS

Sacramento County is currently in nonattainment for ozone and PM_{2.5} relative to the NAAQS and for ozone and PM₁₀ relative to the CAAQS. The most current air quality attainment plans adopted by SMAQMD are the *2023 Sacramento Regional Plan for the 2015 70 ppb 8-Hour Ozone Standard*, adopted in October 2023, and the 2020 MTP/SCS. The 2020 MTP/SCS was adopted on November 18, 2019. In November 2022, the SACOG Board of Directors authorized SACOG staff to pursue State legislation to extend the SACOG’s MTP/SCS update schedule, which moved the plan adoption date from spring 2024 to fall 2025. Assemblymember Cecilia Aguiar-Curry subsequently introduced a bill (AB 350) providing SACOG with the legislative authorization needed to keep the current MTP/SCS in compliance with State law for an additional two years. This legislation went into effect on January 1, 2024.

The emissions inventories used to develop these plans are based primarily on projected population and employment growth and associated VMT for the SVAB. Estimates of this regional growth are based in part on the planned growth identified in regional and local land use plans such as general plans or distinct area plans. Therefore, projects that would result in population and/or employment growth beyond that projected in regional or local plans could result in increases in VMT exceeding that forecasted in the attainment plans, in turn resulting in mobile-source emissions that could conflict with or obstruct implementation of the air quality plans. Increases in VMT beyond that projected in the County’s General Plan, SACOG’s regional VMT modeling, and SMAQMD regional air quality plans generally would be considered to have a significant adverse incremental effect on the SVAB’s ability to attain the NAAQS and CAAQS for all criteria air pollutants.

The CAP is not a growth-inducing plan and does not propose a change in land uses from those discussed in the GPU EIR. Implementation of the CAP would not increase development potential beyond what was assumed and analyzed in the GPU EIR or result in changes to existing land use and zoning designations. As discussed in Impact AQ-3 below, implementation of the CAP would not increase project-level operational air quality emissions such that they would exceed SMAQMD thresholds of significance, as

adopted by the County, beyond what was considered in the GPU EIR. According to the SMAQMD CEQA Guide, individual projects that do not exceed SMAQMD's mass emission thresholds for operational emissions of ROG, NO_x, PM₁₀, or PM_{2.5} would not conflict with or obstruct implementation of SMAQMD's air quality planning efforts (SMAQMD 2020).

As discussed in further detail below, the CAP contains GHG emissions reduction measures and actions that have the co-benefit of reducing criteria pollutant emissions. For example, Measure GHG-06 would replace fossil fuel-powered landscaping equipment with electric equipment. This would reduce the combustion of fossil fuels used for landscaping activities and thus would reduce criteria pollutant emissions. Further, CAP measures that pertain to the planning and design of communities would support infill, transit-oriented development, and mixed-use projects (Measures GHG-10 and GHG-13). These types of developments, which are consistent with development envisioned in the General Plan, are intended to reduce vehicle VMT, and therefore, reduce criteria pollutant emissions from dust and the combustion of fossil fuels. Lastly, Measure GHG-11 (increase transit ridership above 2021 levels by 16 percent by 2030 and 43 percent by 2045, through implementation of the Circulation Element's "Transit" policy plan) would reduce VMT per capita and increase electric vehicle (EV) usage compared to the 2021 baseline and future adjusted business as usual, both of which would reduce the consumption of diesel fuel and associated TAC emissions. Therefore, implementation of the CAP would not result in activities that would conflict with or obstruct implementation of the applicable air quality plans beyond those disclosed in the GPU EIR.

Notably, implementation of the CAP would reduce countywide VMT compared to General Plan buildout (as described in Chapter 8, "Transportation" of this SEIR). For example, Measure GHG-08 would develop a VMT impact fee program requiring developers to contribute to regional VMT reductions when project-specific VMT cannot be mitigated to below the significance thresholds after all feasible on-site mitigation has been implemented. This program would be developed by implementing actions such as Action GHG-08-b. Action GHG-08-b would involve adopting an ordinance establishing the VMT Impact Fee Program, which would allow project proponents to pay for off-site VMT mitigation after all feasible on-site mitigation has been implemented and project VMT is still above the significance threshold. Action GHG-08-c would establish a VMT impact fee fund to invest in VMT mitigation projects and a fee collection mechanism for payments by developers.

Measure GHG-09 would update the requirements for transportation system management (TSM) plans to include a target to reduce annual VMT from all new development by 15 percent through 2045. This update would be achieved by implementing actions such as Action GHG-09-a. Action GHG-09-a would involve adopting an ordinance to update Section 5.9.6 of the Zoning Code to update the TSM plan requirements. The Zoning Code update would require new development to establish a target of a 15 percent reduction in annual VMT below the regional average; it also would include a requirement for annual reporting of employee's commute trips and alignment with the VMT reduction target, and a requirement to join the 50 Corridor

Transportation Management Association and Sacramento Transportation Management Association. In addition, Action GHG-09-c would direct the County to partner with SACOG to provide up-to-date information about available transportation demand management programs in Sacramento County through email and at the time of annual reporting for all projects subject to Section 5.9.6 of the Zoning Code.

Measure GHG-11 would involve partnering with regional transportation agencies to increase transit ridership above 2021 levels by 16 percent by 2030 and 43 percent by 2045, through implementation of the "Transit" policy plan in the Circulation Element. This intent would be realized by implementing actions such as Action GHG-11-a. Action GHG-11-a would involve updating the Traffic Impact Analysis Guidelines to include assessments of public transit for criteria such as accessibility of transit, including Americans with Disabilities Act accessibility, to pedestrians in the project vicinity; the need for route extensions/connectors and bus stops; and the adequacy of pedestrian and bicycle connections to transit, including bike paths and parking.

As stated above, the emission inventories used to develop regional air quality plans are based primarily on projected population and employment growth and associated VMT for the SVAB. By reducing VMT in the county through the implementation of measures and actions meant to reduce VMT such as those listed above, the CAP would be beneficial to the VMT reduction goals of the 2023 Sacramento Regional Plan for the 2015 70 ppb 8-Hour Ozone Standard and the 2020 MTP/SCS. Decreasing per capita emissions, especially those related to VMT, also aligns with the goals of the 2022 SIP (CARB 2022b: 73).

Therefore, the CAP would not conflict with or obstruct applicable air quality plans. The CAP would not result in substantially more severe impacts related to a conflict with an applicable air quality plan than were disclosed in the GPU EIR. The CAP's contribution to impacts would not be substantial. Implementing the CAP would result in a reduction of the impacts identified in the GPU EIR because it would reduce emissions compared to those disclosed in the GPU EIR (see Impact AQ-3). However, overall impacts would remain *significant and unavoidable* as identified in the GPU EIR.

MITIGATION MEASURES

No further mitigation is required.

4.5.2 IMPACT AQ-2: RESULT IN A CUMULATIVELY CONSIDERABLE NET INCREASE OF SHORT-TERM CONSTRUCTION EMISSIONS OF CRITERIA POLLUTANTS AND PRECURSORS (NO_x, ROG, PM₁₀, AND PM_{2.5})

GENERAL PLAN UPDATE EIR DETERMINATION

Construction emissions are discussed in Chapter 11, "Air Quality," on pages 11-73 to 11-74 of the GPU EIR. The GPU EIR determined that impacts related to construction-related emissions of criteria air pollutants would be significant and unavoidable.

Compliance with measures required for NO_x and visible emissions from equipment would reduce PM₁₀ emissions; however, these emissions can only be controlled by mitigation for active grading of up to 15 acres, and beyond that amount, the control becomes less effective. Therefore, the GPU EIR assumed that PM₁₀ emissions would likely exceed local thresholds. Additionally, the GPU EIR concluded that grading activities would exceed 15 acres in some cases, resulting in **significant and unavoidable** impacts despite the application of feasible mitigation to reduce PM₁₀ emissions from grading.

PROPOSED CLIMATE ACTION PLAN IMPACT ANALYSIS

The CAP is a policy-level document that does not include any site-specific designs or proposals or grant any entitlements for development; however, implementation of the CAP measures may result in construction activities that could increase short-term emissions of criteria air pollutants and precursors.

Multiple CAP goals and actions may result in construction activities that would generate criteria pollutant emissions: specifically, those that could result in the construction of new EV charging stations (Measure GHG-07), minor bicycle and pedestrian infrastructure (e.g., bike lanes, bike parking, pedestrian paths) (Measures GHG-11 and GHG-12), new infrastructure to improve access to transit and increase transit ridership (Measure GHG-09), new renewable energy systems identified by SMUD through their comprehensive planning process (Measures GHG-03 and GHG-05), residential and commercial retrofits (Measure GHG-04), infill development (Measure GHG-13), new infrastructure to capture additional landfill gas (Measure GHG-14), and tree and vegetation planting (Measure GHG-02).

This type of construction activity is generally smaller-scale and done using small machinery, limited heavy-duty construction equipment, and would involve minimal numbers of construction workers and associated worker vehicle trips. Bike and pedestrian improvements, as well as infill development, may require the use of equipment including graders, pavers, and trenchers. However, these projects are already contemplated under existing County programs and would not be expected to exceed established emissions thresholds. Larger renewable energy systems require some construction grading and vehicle trips that are typical of the typology of construction contemplated in the General Plan. Construction-related emissions of criteria air pollutants would generally be minimal or in line with construction activities previously contemplated in the GPU EIR. SMUD and the County are already engaged in plans to increase renewable energy facilities to meet increasing demand for renewables. It is too speculative at this time to conclude that this measure would require the substantial expansion of existing or construction of new unplanned renewable energy facilities based upon the plans and projects currently underway. In addition, Measure GHG-16 would encourage the adoption of zero-emission construction and agricultural equipment through incentives and outreach efforts. This measure would limit emissions of criteria pollutants related to the combustion of fossil fuels in construction equipment during implementation of the measures identified above.

CAP Measure GHG-14 would increase the diversion of organic waste deposited into landfills from both commercial and residential sources to achieve a 75 percent diversion rate by 2030 and a 90 percent rate by 2045 and increase gas collection at County-owned landfills to support the objectives of SB 1383. Implementation of the measure would require increased local capacity for composting and processing of organic waste; however, because regulations already mandate diversion, the new facilities would be constructed regardless of whether the CAP is adopted. The CAP directs the County to increase the processing capacity of composting facilities which could be achieved through a variety of options including enhancing existing facilities and improving technology in the processing of organic waste. The County is already engaged in plans to ensure its composting facilities meet the mandate outlined in SB 1383, which may also satisfy the objectives of CAP Measure GHG-14. It is too speculative at this time to conclude that this measure would require the substantial expansion of existing or construction of new unplanned composting facilities. Therefore, the goal of increasing composting capacity in the county would likely not result in a substantial increase in construction emissions than would otherwise occur under the GPU EIR. Therefore, associated construction emissions to develop facilities planned for by the County would not be a direct result of the CAP.

All future discretionary projects subject to CEQA would be evaluated against SMAQMD CEQA thresholds for construction-related air pollutant emissions and would be required to implement construction mitigation to reduce emissions exceeding SMAQMD thresholds. Furthermore, all projects would be required to follow all applicable SMAQMD rules to limit construction emissions, such as SMAQMD Rule 403 (Fugitive Dust), SMAQMD Rule 404 (Particulate Matter), and SMAQMD Rule 442 (Architectural Coatings). Projects resulting from CAP implementation would also be required to comply with all applicable General Plan policies, such as Policy AQ-11, which encourages contractors operating in the county to procure and operate low-emission vehicles and to seek low-emission fleet status for their off-road equipment; and Policy AQ-16, which prohibits the idling of on- and off-road engines when the vehicles are not moving or when the off-road equipment is not performing work for more than five minutes in any one-hour period.

As stated above under “Significance Criteria,” according to current SMAQMD guidance, projects that do not implement SMAQMD’s BMPs must meet a zero threshold for peak daily and annual emissions for PM₁₀ and PM_{2.5}. With implementation of SMAQMD’s BMPs, SMAQMD’s peak daily and annual thresholds increase to 80 lb/day or 14.6 tpy for PM₁₀ and 82 lb/day or 15 tpy for PM_{2.5}. Therefore, without implementation of SMAQMD’s Basic Construction Emission Control Practices, any PM emissions during construction would exceed SMAQMD thresholds and any construction required to implement the CAP would result in potentially significant air pollutant emissions.

CAP Action GHG-16-e would implement SMAQMD’s BMPs such that the emissions thresholds for PM₁₀ and PM_{2.5} that would apply to CAP projects would be 80 lb/day or 14.6 tpy of PM₁₀ and 82 lb/day or 15 tpy of PM_{2.5}. The dust control measures outlined in SMAQMD’s Basic Construction Emission Control Practices (Best Management Practices), which would be required of all projects under the CAP action would reduce impacts of fugitive dust emissions by reducing dust from moving vehicles. Specifically,

the practices call for watering exposed surfaces and limiting vehicle speeds on unpaved roads; reducing the potential for dust to escape haul trucks by placing covers over the truck beds when on major roadways; wet-vacuuming mud/dirt tracked onto public roadways; and completing high-movement areas (e.g., roadways, sidewalks, and parking lots) as soon as possible to reduce the amount of unpaved surfaces that could result in dust generation.

Action GHG-16-e would apply to all construction activities associated with implementation of the CAP and would be enforced by the County in coordination with SMAQMD. As stated in the preceding analysis, construction activities associated with implementation of the proposed CAP would be minor and, with the implementation of SMAQMD BMPs and thus the use of SMAQMD's non-zero PM thresholds, would not exceed applicable criteria pollutant thresholds.

Regarding the health effects of regional concentrations of criteria air pollutants, as discussed previously, many of the projects and associated construction activities would be relatively minor and are not expected to exceed SMAQMD thresholds of significance. Other, more intense construction activities may be required to implement exhaust and dust mitigation measures, depending on individual project size and anticipated construction activity.

All potential emissions sources and activity types that would be necessary to support the CAP are consistent with those previously evaluated in the GPU EIR. The proposed CAP would not result in substantially more severe impacts related to construction emissions than anticipated in the GPU EIR for General Plan buildout. With implementation of Action GHG-16-e, construction activities associated with the CAP would not likely result in criteria pollutant emissions exceeding SMAQMD thresholds. The CAP's contribution to impacts would not be substantial and overall impacts would remain **significant and unavoidable**, as identified in the GPU EIR.

MITIGATION MEASURES

No further mitigation is required.

4.5.3 IMPACT AQ-3: RESULT IN A CUMULATIVELY CONSIDERABLE NET INCREASE OF LONG-TERM OPERATIONAL EMISSIONS OF CRITERIA POLLUTANTS AND PRECURSORS (NO_x, ROG, PM₁₀, AND PM_{2.5})

GENERAL PLAN UPDATE EIR DETERMINATION

The GPU EIR discussed operational air quality impacts in two sections: "Generation of On-Road Mobile Source Criteria Pollutant Emissions in Excess of SMAQMD Thresholds" (pp. 11-77 to 11-78) and "Generation of Stationary, Area, and Off-Road Criteria Pollutant Emissions in Excess of SMAQMD Thresholds" (p. 11-81). These two sections collectively concluded that buildout of the General Plan could result in long-term operational emissions that could exceed local thresholds, despite the implementation of all feasible mitigation. Impacts were determined to be **significant and unavoidable**. For purposes of

this analysis, the two operational impacts analyzed in the GPU EIR are considered together under a single evaluation of impacts related to long-term operational emissions.

PROPOSED CLIMATE ACTION PLAN IMPACT ANALYSIS

Multiple CAP measures and actions would involve occasional maintenance activities (e.g., use of maintenance vehicles, equipment replacement, tree watering and trimming, vegetation management): specifically, those that would result in new facilities such as new EV charging stations (Measure GHG-07), minor bicycle and pedestrian infrastructure (Measures GHG-11 and GHG-12), new infrastructure to improve access to transit and increase transit ridership (Measure GHG-09), new renewable energy systems (Measures GHG-03 and GHG-05), minor residential and commercial retrofits (Measure GHG-04), infill development (Measure GHG-13), new infrastructure to capture additional landfill gas (Measure GHG-14), and tree and vegetation planting (Measure GHG-02). These maintenance activities for facilities would be minimal or accomplished with existing personnel and in conjunction with established maintenance activities; thus, associated maintenance-related operational air pollutant emissions would also be minimal or would not increase.

The CAP may indirectly result in future projects where measures and actions further existing programs. Existing or new facilities such as new renewable energy facilities (Measures GHG-03 and GHG-04) and enhanced, new, or expanded waste processing facilities (Measure GHG-14) may result in fugitive dust emissions from vehicle travel on paved and unpaved roads and windblown dust that has settled on solar panels. Such future projects, if located in areas prone to high wind and/or in areas with exposed surfaces (e.g., unpaved surfaces with limited vegetated ground cover), could be subjected to re-entrained fugitive dust and/or windblown dust. As described above, development of renewable energy facilities occurs in response to demand forecasts prepared by the utility that reflect anticipated population growth, the regulatory environment, and utility-specific commitments, such as the SMUD Zero Carbon Plan. The County cannot determine the need for new or expanded infrastructure in excess of the facilities currently planned by the County or SMUD that would be a result of the CAP with a reasonable level of certainty at this time. Applicants for future projects that support implementation of the CAP would be required to comply with SMAQMD Rules 403, 404, 405, and 427 to control dust emissions during any operational activities that generate fugitive dust, utilizing measures specified in these rules as applicable to each operational activity. All future discretionary projects would be subject to project-level CEQA analysis to determine whether operational air pollutant emissions would exceed SMAQMD thresholds of significance.

Measure GHG-14, discussed above, would increase the diversion of organic waste deposited into landfills from both commercial and residential sources. This measure would also require increased local capacity for composting and processing of organic waste. The County is already engaged in plans to ensure its composting facilities meet the mandate outlined in SB 1383, which may also satisfy the objectives of CAP Measure GHG-14. It is too speculative at this time to conclude that this measure would require the substantial expansion of existing or construction of new unplanned

composting facilities. It is unlikely that the project would result in a substantial increase in additional truck hauling trips to support increased local composting capacity. Further, most of the trips would already occur as a result of SB 1383 implementation and would likely occur regardless of whether the CAP is adopted. Furthermore, these trips would be diverted from landfills within the county, thus not likely inducing additional trips compared to baseline trip activity. Therefore, associated operational emissions from increased truck trips would not be a direct result of the CAP. Moreover, the decomposition of organic waste in landfills is a notable source of ROG and NO_x emissions, which would decrease with the diversion of such waste to the composting facility captured under Measure GHG-14.

Although the proposed CAP is intended to reduce GHG emissions, many of the measures and actions would also have the co-benefit of improving air quality. Construction under the CAP could result in temporary emissions of criteria pollutants; however, the CAP would be largely beneficial to operational air quality because it contains measures and actions that would reduce criteria pollutant emissions compared to existing and future General Plan buildout conditions. For example, Measure GHG-06 would require the turnover of fossil fuel-powered landscaping equipment for electric equipment, which would reduce the combustion of fossil fuels used for landscaping activities and thus, reduce criteria pollutant emissions. This aim would be achieved through actions such as Action GHG-06-a. Action GHG-06-a would involve coordinating with SMAQMD to implement a landscaping equipment trade-in program, which would provide vouchers for purchasing electric landscape equipment to residents and businesses that trade in their fossil fuel-powered landscaping equipment at the North Area Recovery Facility. Action GHG-06-c would involve developing a tracking system for equipment exchanged through the Landscaping Equipment Trade-In Program, including the number and type of equipment.

Additionally, implementation of transportation-related measures in the CAP would reduce countywide VMT and increase EV usage, both of which would reduce the consumption of fossil fuels and associated emissions of criteria pollutants. These measures include Measure GHG-07, which involves planning for and deploying increased zero-emission vehicle infrastructure such as EV chargers; Measure GHG-08, which would develop a VMT impact fee program to require developers to contribute to regional VMT reductions when project-specific VMT cannot be mitigated to below significance thresholds after all feasible on-site mitigation has been implemented; Measure GHG-09, which involves updating the requirements in TSM plans to include a target for new development of a 15 percent reduction in annual VMT below the regional average; and Measure GHG-11, which involves increasing transit ridership by 16 percent above 2021 levels by 2030 and 43 percent by 2045, through implementation of the Circulation Element's "Transit" policy plan.

Examples of actions that would support EV use include Action GHG-07-a, which would require developing and adopting an ordinance that amends the building code to require EV charging capability in new residential and nonresidential developments consistent with the CALGreen Code's Tier 2 requirements; and Action GHG-07-h, which would require increasing utilization of publicly accessible EV charging at Sacramento

International Airport and installation of additional EV chargers as supported by demand. Examples of actions that would reduce VMT include Action GHG-09-d, which would require imposing a fee structure for projects that do not meet the requirements for employee commute trip reduction and using the fees collected to fund micro transit or other trip reduction projects; and Action GHG-11-b, which would require updating the Traffic Impact Analysis Guidelines to require projects near transit to prioritize VMT improvements to and support of transit access.

Implementing the CAP would also be beneficial because it would reduce energy-related emissions. An example of this is Measure GHG-05, which would require all newly built projects to achieve specific performance standards to maximize energy efficiency and decarbonization. This aim would be achieved through actions such as Action GHG-05-a, which would require working with the California Energy Codes and Standards Program to develop cost-effective reach codes that must be met by all new construction. The reach codes would require that residential projects meet or exceed a modeled EDR1 (Energy Design Rating) metric of 11.5 points above the Title 24, Part 6 statewide performance minimum (the “standard design building”), and that nonresidential projects reduce non-electricity emissions by 19 percent by 2030 and by 85 percent by 2045. Additionally, Action GHG-05-b would provide fee reductions or offsets and expedited permitting for residential and nonresidential projects that are built all-electric and do not include new natural gas infrastructure piping.

Other measures such as Measure GHG-04 would require that existing buildings undergoing retrofits achieve specific performance standards to maximize energy efficiency and decarbonization through the development and implementation of new reach codes. Specifically, Measure GHG-04 requires that the modeled energy efficiency of all existing residential buildings achieve half of the maximum cost-effective score at time of retrofit by 2030 and the maximum cost-effective score by 2045; and all existing nonresidential buildings must reduce non-electricity emissions 19 percent by 2030 and 85 percent by 2045. By increasing the use of electricity and decreasing the use of natural gas combustion, the CAP would improve countywide air quality.

CAP measures pertaining to the planning and design of communities would support infill, transit-oriented development, and mixed-use projects (Measures GHG-10 and GHG-13). These types of developments, which are consistent with the County existing planning efforts, are intended to reduce vehicle VMT, and thus, criteria pollutant emissions from dust and the combustion of fossil fuels.

In *Friant Ranch*, the California Supreme Court concluded that CEQA requires consideration of the human health impacts of regional criteria pollutant emissions that exceed air district standards. Regional emissions may exceed SMAQMD’s regulatory thresholds during construction and operational activities for future projects necessary to implement the CAP across horizon years 2030 and 2045, though not more than what was considered in the GPU EIR; therefore, the potential exists for these emissions to exceed the CAAQS and NAAQS and result in a health impact. For example, breathing ground-level ozone (produced from emissions of NO_x and VOC) can have health impacts that include reduced lung function; inflammation of airways; throat irritation, pain, burning, or

discomfort in the chest when taking a deep breath; chest tightness; wheezing; or shortness of breath. Exposure to PM₁₀ has been associated primarily with worsening of respiratory diseases, including asthma and chronic obstructive pulmonary disease, leading to hospitalization and emergency department visits. Exposure to PM_{2.5} has been associated with premature mortality, increased hospital admissions for heart or lung causes, acute and chronic bronchitis, asthma attacks, emergency room visits, respiratory symptoms, and restricted-activity days, and long-term PM_{2.5} exposure has been linked to premature death. Health impacts of criteria pollutants are discussed further in the “Environmental Setting” section above.

Prior to the Supreme Court’s *Friant Ranch* decision, South Coast Air Quality Management District submitted an amicus brief to the Court explaining that it is not feasible to quantify project-level health impacts based on then-available modeling tools (SCAQMD 2015). SMAQMD and EPA still have not approved a quantitative method to reliably, meaningfully, and consistently translate the mass-emission estimates for criteria air pollutants resulting from individual future projects required to implement the CAP into specific health impacts. There are numerous scientific and technological complexities associated with correlating an individual project’s criteria air pollutant emissions with specific health impacts or potential additional nonattainment days.

Further, without knowing the exact specifications for projects that may be required to implement the CAP, there is no way to accurately calculate the potential for health impacts from the CAP that may occur across horizon years 2030 and 2045. Emissions and associated health impacts could decline in 2045 relative to 2021 and 2030 because of electrification and increased use of renewable energy. To the extent that such projects would generate emissions during construction and operations and could exceed air district construction significance thresholds, they would contribute to the health impacts of the criteria pollutants described in the “Environmental Setting” section above.

The GPU EIR analyzed the air quality impacts of the projected development over the General Plan planning horizon. The CAP measures and actions described above would facilitate infill development as envisioned in the General Plan, would not change the Land Use Diagram, and would reduce the consumption of fossil fuels in the energy and transportation sectors. Therefore, the proposed CAP would not result in new substantial adverse physical impacts related to operational criteria pollutant emissions over what was already disclosed in the GPU EIR. The CAP’s contribution to impacts would not be substantial and overall impacts would remain **significant and unavoidable**, as identified in the GPU EIR.

MITIGATION MEASURES

No further mitigation is required.

4.5.4 IMPACT AQ-4: EXPOSE SENSITIVE RECEPTORS TO SUBSTANTIAL POLLUTANT CONCENTRATIONS

GENERAL PLAN UPDATE EIR DETERMINATION

Exposure of sensitive receptors to substantial pollutant concentrations is discussed in Chapter 11, “Air Quality,” on pages 11-74 to 11-75 and 11-89 to 11-103 of the GPU EIR. The GPU EIR determined that because construction activities associated with development allowed under the General Plan would be short-term, occurring over a construction period of several months to several years, impacts related to the exposure of sensitive receptors to TACs would be ***less than significant***. The GPU EIR concluded that the implementation of SMAQMD-required measures meant to reduce construction-related emissions would further reduce construction emissions. The GPU EIR did not include an analysis of operational TAC emissions.

PROPOSED CLIMATE ACTION PLAN IMPACT ANALYSIS

The focus of the analysis of TAC emissions for the CAP is diesel PM. Other TACs exist (e.g., benzene, 1,3-butadiene, hexavalent, chromium, formaldehyde, and methylene chloride) and are associated primarily with industrial operations and mobile sources; however, CARB has determined that diesel PM is responsible for the majority (about 70 percent) of California's estimated known cancer risk attributable to TACs (SMAQMD 2024b). Moreover, the CAP does not include any industrial development; therefore, diesel PM exposure from the construction of CAP projects is the focus of this analysis.

The potential cancer risk from the inhalation of diesel PM outweighs the potential risk for all other health impacts (i.e., noncancer chronic risk and short-term acute risk) and health impacts from other TACs (CARB 2003). Regarding exposure of diesel PM, the dose to which receptors are exposed is the primary factor used to determine health risk. Dose is a function of the concentration of a substance or substances in the environment and the duration of exposure to the substance. Dose is positively correlated with time, meaning that a longer exposure period would result in a higher level of health risk for any exposed receptor. According to the California Office of Environmental Health Hazard Assessment's Air Toxics Hot Spots Program Risk Assessment Guidelines, exposure of sensitive receptors to TAC emissions should be based on a 30-year exposure period for estimating cancer risk at the maximally exposed individual (MEI), with nine- and 70-year exposure periods at the MEI as supplemental information. Furthermore, a 70-year exposure period is recommended for estimating cancer burden or providing an estimate of population-wide risk (OEHHA 2015).

CONSTRUCTION-GENERATED EMISSIONS

Sensitive receptors are located throughout the county where projects necessary to implement the proposed CAP would occur, and the CAP could result in construction-related TAC emissions that affect these sensitive receptors. CAP goals and actions could result in construction activities that include the use of off-road diesel-powered construction equipment and temporarily increase truck hauling trips, generating temporary TAC emissions. These include measures that could result in the construction

of new EV charging stations (Measure GHG-07), minor bicycle and pedestrian infrastructure (Measures GHG-11 and GHG-12), new infrastructure to improve access to transit and increase transit ridership (Measure GHG-09), new renewable energy systems (Measures GHG-03 and GHG-05), minor residential and commercial retrofits (Measure GHG-04), installation of solar PV and battery storage (Action GOV-04-a, Action GOV-04-b, Action TEMP-08-c, and Action TEMP 08-d); infill development (Measure GHG-13), new infrastructure to capture additional landfill gas (Measure GHG-14), and tree and vegetation planting (Measure GHG-02). Other CAP measures and actions that could result in minor construction-related emissions include those that would result in tree planting (Action GHG-02-a, Action GHG-02-c, Action GHG-02-d, Action GHG-02-e, Action GHG-02-f); removal of existing and installation of new landscaping (Action GOV-05-d and Action GOV-05-e, Action TEMP-08-f, Action WATER-04-a, and Action WATER-04-b); installation of water reuse systems (Action WATER-02-a, Action WATER 02-d, and Action WATER-02-e); and flood protection projects (Action FLOOD-01-a, Action FLOOD-05-a, Action FLOOD-05-b, Action FLOOD-06-b, Action FLOOD-07-a, Action FLOOD-08-b, Action FLOOD-08-c, Action FLOOD-10-a, Action FLOOD-11-a, Action FLOOD-12-a, and Action FLOOD-14-a). Specific locations for these actions have not been identified.

These types of infrastructure updates are consistent with the types of construction evaluated in the GPU EIR, and implementing the CAP would not substantially increase the magnitude of the construction occurring through the buildout of growth contemplated in the General Plan. None of the measures would result in the acceleration of development that is not already contemplated by the County or planned for by other agencies such as SMUD including existing or new renewable energy facilities (Measures GHG-03 and GHG-04) and enhanced, new, or expanded waste processing facilities (Measure GHG-14). All projects would also be required to comply with all applicable General Plan policies such as Policy AQ-11, which entails encouraging contractors operating in the county to procure and operate low-emission vehicles and to seek low-emission fleet status for their off-road equipment; and Policy AQ-16, which prohibits the idling of on- and off-road engines when the vehicles are not moving or when the off-road equipment is not performing work for more than five minutes in any one-hour period. Compliance with these policies would further limit TAC emissions from construction activities.

Similarly, compliance with CARB's airborne toxics control measures would offset any potential impacts associated with disturbance of naturally occurring asbestos during construction, although the project area is not known to contain naturally occurring asbestos (Van Gosen and Clinkenbeard 2011). Additionally, Measure GHG-16 would encourage the adoption of zero-emission construction and agricultural equipment through incentives and outreach efforts. This measure would limit emissions of TACs related to the combustion of fossil fuels in construction equipment during implementation of the measures identified above. Therefore, implementation of the CAP would not result in construction activities that generate more severe TAC emissions than what was already considered under the GPU EIR.

OPERATIONAL EMISSIONS

CAP measures would result in occasional maintenance activities (e.g., maintenance vehicle use, equipment replacement, tree watering and trimming, vegetation management) that could generate TAC emissions from the use of diesel trucks and/or equipment. These measures include those that would result in new facilities such as new EV charging stations (Measure GHG-07), minor bicycle and pedestrian infrastructure (Measures GHG-11 and GHG-12), new infrastructure to improve access to transit and increase transit ridership (Measure GHG-09), new renewable energy systems (Measures GHG-03 and GHG-05), minor residential and commercial retrofits (Measure GHG-04), infill development (Measure GHG-13), new infrastructure to capture additional landfill gas (Measure GHG-14), and tree and vegetation planting (Measure GHG-02).

These maintenance activities for facilities would be minimal or accomplished by existing personnel and in conjunction with established maintenance activities; thus, associated operational TAC emissions and exposure levels would also be minimal or would not increase. The dose to which receptors are exposed is the primary factor used to determine health risk (i.e., potential exposure to TAC emission levels that exceed applicable standards). Regarding TAC exposure, dose is positively correlated with time, meaning that a longer exposure period would result in a higher exposure level for any exposed receptor. Therefore, the risks estimated for an exposed individual are higher if a fixed exposure occurs over a longer period. Consequently, TAC emissions from stationary sources such as factories, power plants, or on-site generators are often of more concern than emissions from mobile sources like those that would be required for occasional maintenance under the CAP. Because maintenance activities would be relatively small-scale (requiring small crews and minimal heavy equipment), would occur for short periods of time, and would occur sporadically throughout the county, TAC emissions from operational activities would likely be minimal and would not be likely to expose receptors to substantial concentrations for an extended period.

Operation of these future facilities could result in fugitive dust emissions from maintenance activities occurring on unpaved surfaces, from maintenance or employee vehicles or trucks traveling on unpaved surfaces, from windblown dust settled on solar panels, or from other similar types of operational activities. SMAQMD recommends evaluating localized air quality impacts on sensitive receptors in the immediate vicinity of a project. However, the impacts are based on specific equipment and operations. Because the exact nature, location, timing, and operation of the future projects facilitated by the CAP measures and actions are unknown, quantification of localized operational impacts and health risks would not be feasible and would be speculative.

As stated above, the proposed CAP would have the co-benefit of improving air quality and reducing GHG emissions in the county. The proposed CAP contains measures and actions that, over time, would reduce overall TAC emissions in the county compared to existing conditions. As described above, transportation-related measures would work in unison to reduce VMT per capita and increase EV usage, both of which would reduce the consumption of diesel fuel and associated TAC emissions. These transportation measures include Measure GHG-07 (plan for and deploy increased zero-emission

vehicle infrastructure such as EVs), Measure GHG-09 (update the requirements for TSM plans to include a target for new development of a 15 percent reduction in annual VMT below the regional average), and Measure GHG-11 (increase transit ridership above 2021 levels by 16 percent by 2030 and 43 percent by 2045 through implementation of the Circulation Element's "Transit" policy plan).

The proposed CAP contains measures that would be beneficial in terms of reducing TAC emissions associated with the consumption of fossil fuels for energy production. These measures include Measures GHG-04 and GHG-05. Measure GHG-04 would require that existing buildings undergoing retrofits achieve specific performance standards to maximize energy efficiency and decarbonization; Measure GHG-05 would implement renewable energy requirements for new development to reduce natural gas use.

By increasing the integration of electric utilities and phasing out existing natural gas utilities, the CAP would reduce TAC emissions in the county by reducing the combustion of fossil fuels used to produce electricity for buildings. Examples of actions that would achieve these reductions include Action GHG-04-I and Action GHG-05-b. Action GHG-04-I would offset or reduce permitting fees for applicants for building retrofits that include all-electric conversion of mixed-fuel buildings and capping of natural gas lines, to encourage exceedance of existing building reach code requirements. Action GHG-05-b would incentivize the decarbonization of new construction through fee reductions and expedited permitting for nonresidential and residential projects that are built all-electric and do not include new natural gas infrastructure.

CAP measures that pertain to the planning and design of communities would support infill, transit-oriented development, and mixed-use projects (Measures GHG-10 and GHG-13). These types of developments, which are encouraged in the General Plan, are intended to reduce vehicle VMT and would therefore reduce TAC emissions related to the combustion of fossil fuels.

CAP Measure GHG-14, discussed above, would increase the diversion of organic waste deposited into landfills from both commercial and residential sources to achieve a 75 percent diversion rate by 2030 and a 90 percent rate by 2045 and increase gas collection at County-owned landfills to support the objectives of SB 1383. The increased tonnage diverted from landfills would result in increased haul truck trips to and from organics processing facilities in the county; however, it is anticipated that the haul truck trips to the organics processing facility would be diverted from the landfill. Therefore, a net increase in the number of haul truck trips within the county is not anticipated and the net increase in diesel emissions, if any, would not be substantial.

The exact nature, location, timing, and operation of projects facilitated by CAP measures and actions are unknown, and health risk impacts from TACs are cumulative over the life of the nearby receptors; therefore, quantification of potential health risks would be speculative. However, because these future projects may be constructed and operated close to sensitive receptors, the potential exists for the health risk level to

exceed air district thresholds of significance, which could cause the adverse health impacts discussed in the “Environmental Setting” section above. Therefore, projects facilitated by the CAP measures and actions could expose sensitive receptors to substantial TAC concentrations. This would be a significant impact.

The magnitude of long-term impacts would increase over time to the extent that more projects would be facilitated by CAP measures and actions to meet the CAP’s increasingly aggressive 2030 and 2045 GHG reduction targets. The impacts of projects facilitated by the CAP measures and actions would be analyzed on a project-specific basis; if it is determined that such a project would exceed air district thresholds of significance, mitigation measures would be implemented to avoid or reduce the impact if feasible.

SUMMARY

The CAP would not result in new substantial adverse impacts related to the exposure of sensitive receptors to a substantial concentration of construction-related TAC emissions over what was already disclosed in the GPU EIR. The CAP’s contribution to construction-related TAC impacts would not be substantial. As described above, the GPU EIR did not evaluate operational TAC emissions. Operation of the projects facilitated by the CAP measures and actions would primarily involve sporadic, short-term maintenance activities requiring relatively few diesel-powered vehicles or pieces of equipment and potentially some long-term emissions of fugitive dust that would be controlled and regulated through SMAQMD rules. Further, operation of such projects would reduce building- and mobile source–related emissions compared to those that were accounted for in the GPU EIR. Therefore, CAP-related operational TAC emissions would not be substantially greater than those expected with General Plan implementation alone. Thus, implementation of the CAP would not result in a new impact related to TAC emissions not disclosed in the GPU EIR. Impacts related to TAC emissions would be *less than significant*.

MITIGATION MEASURES

No mitigation is required.

4.5.5 IMPACT AQ-5: GENERATE SUBSTANTIAL MOBILE-SOURCE CARBON MONOXIDE CONCENTRATIONS

GENERAL PLAN UPDATE EIR DETERMINATION

Exposure of sensitive receptors to substantial CO concentrations is discussed in Chapter 11, “Air Quality,” on pages 11-81 to 11-89 of the GPU EIR. The GPU EIR determined that, based on modeling conducted to estimate project-generated CO emissions, future-year CO concentrations (relative to the time the GPU EIR was written) would be lower than existing concentrations because of continuing improvements in engine technology and the retirement of older, higher-emitting vehicles. The GPU EIR concluded that the impact of project traffic conditions on ambient CO levels in the county would therefore be *less than significant*.

PROPOSED CLIMATE ACTION PLAN IMPACT ANALYSIS

The CAP would not introduce or change land use designations that would increase traffic or have the potential to result in CO hotspots. The CAP would apply to development enabled under the General Plan but would not, itself, result in any residential development that would result in regional population increases. The goal of the CAP is to reduce GHG emissions in the county, and many of the measures would also have the co-benefit of reducing air pollutant emissions at the regional and local scales.

The CAP would not lead to an increase in vehicular traffic or associated emissions that could cause CO hotspots. As described above, the CAP would implement measures and actions to reduce VMT and encourage EV use, both of which would result in reduced CO emissions from the transportation sector. Moreover, as disclosed in the GPU EIR, CO emissions have historically decreased with the advent of catalytic converters and progressively more stringent fuel economy standards, and the Sacramento region has been in attainment for the CO NAAQS since 1996 (SMAQMD 2004). Additionally, EVs do not contribute to CO hotspots and the CAP includes measures that would increase EV use (e.g., Measures GHG-07 and GOV-01). Therefore, the CAP would not contribute to a CO hotspot.

The CAP would not result in new substantial adverse impacts related to CO relative to those disclosed in the GPU EIR. The CAP's contribution to impacts would not be substantial and overall impacts would remain ***less than significant***.

MITIGATION MEASURES

No mitigation is required.

4.5.6 IMPACT AQ-6: RESULT IN EXPOSURE TO OBJECTIONABLE ODORS

GENERAL PLAN UPDATE EIR DETERMINATION

The GPU EIR evaluated a number “other emissions” that could result from the CAP with potential to adversely affect a substantial number of people. These include the evaluation in “Impact: Elevated Health Risks from Exposure of Sensitive Receptors to Sacramento International Airport Emissions” (GPU EIR page 11-89), “Impact: Elevated Health Risks From Exposure Of Sensitive Receptors To Roseville Rail Yard Emissions” (GPU EIR page 11-92 to 11-103). The CAP would not affect the analysis or conclusions related to these impact topics. The GPU EIR did not analyze impacts related to odors, but this topic was known and could have been evaluated at that time.

PROPOSED CLIMATE ACTION PLAN IMPACT ANALYSIS

Implementation of the CAP could result in the construction of new EV charging stations (Measure GHG-07), minor bicycle and pedestrian infrastructure (e.g., bike lanes, bike parking, pedestrian paths) (Measures GHG-11 and GHG-12), new renewable energy systems (Measures GHG-03 and GHG-05), minor residential and commercial retrofits (Measure GHG-04), infill development (Measure GHG-13), and new infrastructure to capture additional landfill gas (Measure GHG-14), and could involve tree and vegetation

planting (Measure GHG-02). Construction activities to implement these measures would require the use of handheld tools and minor construction equipment that would not emit odors.

CAP measures that would result in the construction of minor bicycle and pedestrian infrastructure (Measures GHG-11 and GHG-12) may result in asphalt paving and diesel truck trips. These types of activities would generally occur in populated residential and commercial areas, but asphalt and diesel PM emissions that generate odors would be minimal, temporary, and highly localized. Additionally, Measure GHG-16 encourages the adoption of zero-emission construction and agricultural equipment through incentives and outreach efforts. This measure would limit odor emissions from the combustion of fossil fuels in construction equipment during implementation of the measures identified above. Because odors would be temporary and would disperse rapidly with distance from the source, construction-generated odors would not adversely affect a substantial number of people.

Measure GHG-14 would support the diversion of organic waste deposited into landfills from both commercial and residential sources and gas collection at County-owned landfills to support the objectives of SB 1383. Implementation of the measure would require local capacity for composting and processing of organic waste, which would generate odors through the anaerobic decomposition of composted waste that the County would divert from landfills and through haul truck trips to composting facilities. Compostable materials handling operations and facilities are regulated by the California Department of Resources Recycling and Recovery. State regulations (14 CCR Section 17863.4) require such operations and facilities to have plans in place to prevent odors from occurring and to identify the measures that should be taken if odors do occur.

The hauling of increased volumes of compostable waste to facilities via truck would result in some odors associated with diesel exhaust but would not adversely affect substantial numbers of people. General Plan Policy AQ-3 requires buffers or other appropriate exposure reduction measures between sensitive land uses and sources of odor, thus reducing impacts on sensitive land uses. The buffers must be established using the *Air Quality and Land Use Handbook: A Community Health Perspective* and SMAQMD's MSAT Protocol to ensure adequate distance between uses. All projects under the CAP would also be required to comply with SMAQMD Rule 402, "Nuisance."

Implementation of the CAP would result in construction-related and operational activities that could generate objectionable odors. As described above, projects that could generate operational odors would be evaluated on a project-by-project basis for appropriate measures to reduce odor exposure consistent with General Plan Policy AQ-3. Future discretionary projects would be required to evaluate project-specific impacts under CEQA at the time of application and project-specific mitigation would be required to minimize or avoid odor impacts to the extent feasible. Therefore, odor impacts related to implementation of the proposed CAP would be ***less than significant***.

MITIGATION MEASURES

No mitigation is required.

5 BIOLOGICAL RESOURCES

5.1 INTRODUCTION

This chapter summarizes the existing common and sensitive biological resources in unincorporated Sacramento County, including special-status wildlife and plant species and vegetation communities. Potential impacts of the project to special-status plant and wildlife species, riparian habitat and other sensitive natural communities, State and federally protected wetlands, wildlife movement corridors and nursery sites, local policies and ordinances, and habitat conservation plans (HCPs) are analyzed. Because this analysis is subsequent to Sacramento County's certified GPU EIR, the evaluation of impacts focuses on the potential for implementation of the proposed CAP to result in new or substantially more severe impacts than presented in the GPU EIR given the changes in environmental and regulatory conditions that have occurred since the certification of the GPU EIR. This chapter incorporates by reference the biological resources setting and impact analysis from the GPU EIR as it applies to the proposed CAP and supplements the prior settings and analysis with relevant conditions that have changed since certification of the GPU EIR. The GPU EIR mitigation measures that are applicable to the proposed CAP also are incorporated herein.

Comments received during the notice of preparation (NOP) scoping process included some relevant to biological resources. Specifically, these comments were related to concerns regarding special-status species, riparian habitat, oak woodlands, fish habitat, artificial nighttime lighting, and nesting birds. These concerns are addressed and summarized in this chapter, as appropriate. A copy of the NOP and comment letters received in response to the NOP are included in Appendix A of this SEIR.

5.2 ENVIRONMENTAL SETTING

The CAP applies to lands and land uses within the unincorporated Sacramento County. The incorporated areas within the county would not be subject to the CAP measures. The GPU EIR included a description of existing conditions within Sacramento County in Chapter 8, "Biological Resources," pages 8-1 through 8-2 and 8-22 through 8-27. The existing conditions in the GPU EIR remain applicable and are incorporated by reference. The following discussion summarizes the information in the GPU EIR and includes supplemental existing conditions information to capture updates since the adoption of the GPU EIR or add information that was not included in the GPU EIR.

5.2.1 HABITAT TYPES

Habitat types in Sacramento County, as described on pages 8-22 through 8-26 of the GPU EIR, include the following: wetlands (e.g., permanent and seasonal, freshwater marshes, vernal pools, wetted swales, human-made stock ponds), valley-foothill

riparian, annual grassland, agricultural cropland, oak woodland, oak savannah, urban forests, orchards, and vineyards.

5.2.2 SPECIAL-STATUS SPECIES

Special-status species are plants and animals that are legally protected or otherwise considered sensitive by federal, State, or local resource conservation agencies and organizations. In this document, special-status species are defined as plants and animals in the following categories:

- those that are listed as rare, threatened, or endangered, or are candidates or possible future listing as threatened or endangered, under the federal Endangered Species Act (FESA) or the California Endangered Species Act (CESA);
- species that meet the definitions of rare or endangered under CEQA Guidelines Section 15380;
- species designated as “fully protected” or “species of special concern” by the California Department of Fish and Wildlife (CDFW);
- plant species designated as List 1B or 2 species by the California Native Plant Society (CNPS); or
- some other species that are tracked by the California Natural Diversity Database (CNDDDB) but do not fall into any of the categories cited above.

Appendix C of the GPU EIR provides lists of special-status plants and special-status wildlife with potential to occur in Sacramento County at the time the GPU EIR was certified. Since adoption of the GPU EIR, several additional plant and wildlife species that meet the definition of special-status species now have the potential to occur and have been included in this analysis. A total of 38 special-status plant species and 69 special-status wildlife species currently have the potential to occur in unincorporated Sacramento County. Special-status plant and animal species are listed at the end of this chapter in Table 5-1 and Table 5-2, respectively. The additional plant and wildlife species that could occur since adoption of the GPU EIR are identified in the tables.

5.2.3 CRITICAL HABITAT

Critical habitat is designated for the survival and recovery of federally listed endangered or threatened species. Protected habitat includes areas for foraging, breeding, roosting, shelter, and movement or migration. The US Fish and Wildlife Service (USFWS) and the National Marine Fisheries Service (NMFS) have designated the following species with critical habitats located within Sacramento County under the FESA (United States Code [USC] Title 16, Section 1533[a][3] [16 USC 1533(a)(3)]) (USFWS 2024; NOAA 2024):

- California tiger salamander (*Ambystoma californiense*),
- Chinook salmon [Central Valley spring-run ESU] (*Oncorhynchus tshawytscha*),

- Chinook salmon [Sacramento River winter-run ESU] (*Oncorhynchus tshawytscha*),
- Delta smelt (*Hypomesus transpacificus*),
- Green sturgeon [Southern DPS] (*Acipenser medirostris*),
- Sacramento orcutt grass (*Orcuttia viscida*),
- Slender orcutt grass (*Orcuttia tenuis*),
- Steelhead [California Central Valley DPS] (*Oncorhynchus mykiss*),
- Valley elderberry longhorn beetle (*Desmocerus californicus dimorphus*),
- Vernal pool fairy shrimp (*Branchinecta lynchi*), and
- Vernal pool tadpole shrimp (*Lepidurus packardii*).

5.2.4 SENSITIVE NATURAL COMMUNITIES

Sensitive natural communities are designated by CDFW, or occasionally in local policies and regulations, and are generally considered to have important functions or values for wildlife and/or are recognized as declining in extent and/or distribution. These communities are considered threatened enough to warrant some level of protection either through the CEQA review process or by local regulations. CDFW tracks such communities through the California Natural Diversity Database (CNDDB), and plant alliances or associations with a State rank of S1 through S3 are considered to be sensitive natural communities by the State to be addressed in the CEQA process. CDFW uses NatureServe's Heritage Methodology for ranking natural communities by their rarity and threat, ranging from 1 (very rare and threatened) to 5 (demonstrably secure). The following sensitive natural communities are recorded within Sacramento County (CDFW 2024):

- coastal and valley freshwater marsh,
- coastal brackish marsh,
- elderberry savanna,
- great valley mixed riparian forest,
- great valley valley oak riparian forest,
- northern claypan vernal pool,
- northern hardpan vernal pool,

- valley needlegrass grassland, and
- valley oak woodland.

5.2.5 JURISDICTIONAL WATERS

Wetlands, as defined by Section 404 of the Clean Water Act, include, but are not limited to marsh, vernal pool, and other seasonal and perennial wetlands. Federally protected wetlands are typically referred to as jurisdictional wetlands, that is, wetlands that fall under the jurisdiction of the US Army Corps of Engineers (USACE). These features also are considered waters of the State subject to jurisdiction by the State Water Resources Control Board (SWRCB) and the regional water quality control boards (RWQCBs). Typically, a wetland is jurisdictional if hydrologic connectivity to a navigable waterway can be demonstrated. Wetlands that lack this connectivity are considered isolated and are not under the jurisdiction of the USACE. All rivers and flood control drainages within Sacramento County that flow to the ocean are within the jurisdiction of these agencies. Under County policy, isolated wetlands are an important biological resource.

5.2.6 WILDLIFE MOVEMENT CORRIDORS

Habitat linkages are contiguous areas of open space that connect two larger habitat areas. Linkages allow for both diffusion and dispersal of a variety of species within the landscape. In addition, linkages can serve as primary habitat for some smaller species. Corridors are linear linkages between two or more habitat patches. Corridors provide for movement and dispersal, but do not necessarily include habitat capable of supporting all life history requirements of a species. The New Growth Areas described in the GPU EIR have a considerable amount of contiguous undeveloped land that provides habitat for listed species to persist within an area. These vast tracts of land are more likely to provide adequate food, water, and shelter. Several Commercial Corridors were also identified in the GPU EIR that have properties that have open land that has not been paved and contain pasture-like open acreage. These Commercial Corridors include Watt Avenue North, Auburn Boulevard North, Folsom Boulevard, Franklin Boulevard, Florin Road, Stockton Boulevard Central, and Stockton Boulevard South. In addition, other important habitat linkages in Sacramento County include those along linear topographic features such as principal rivers of the county, including the Sacramento, American, and Cosumnes.

5.3 REGULATORY SETTING

The regulatory setting described on pages 8-3 to 8-22 of the GPU EIR is incorporated by reference. Applicable federal, State, and local regulations that have seen changes or updates since the adoption of the GPU EIR or those that were not included in the GPU EIR are described below.

5.3.1 FEDERAL

There are no new federal laws or regulations addressing biological resources that are relevant to the project.

5.3.2 STATE

There are no new State laws or regulations addressing biological resources that are relevant to the project.

5.3.3 REGIONAL

SOUTH SACRAMENTO HABITAT CONSERVATION PLAN

At the time of the GPU EIR certification, the South Sacramento Habitat Conservation Plan (SSHCP) was in development and had not yet been approved. The GPU EIR included details of the developing SSHCP that were current at the time. The SSHCP was approved by Sacramento County in 2018, after adoption of the GPU EIR. The information included here is from the approved SSHCP.

The SSHCP presents a regional approach to preserve federal and State endangered and threatened species and to streamline the existing development-permitting process in areas under development. The SSHCP covers 372,000-acres of south Sacramento County and Rancho Cordova, California. It preserves natural lands in Sacramento County and protects habitat for 28 special-status plant and animal species (i.e., covered species), including 10 State and federally listed species. The geographical boundaries of the SSHCP Plan Area are US Highway 50 to the north, the Sacramento River levee and County Road J11 to the west, the Sacramento County line with El Dorado and Amador counties to the east, and the San Joaquin County line to the south. The SSHCP allows Sacramento County and the cities of Sacramento, Rancho Cordova, and Galt to extend incidental take coverage to third parties.

The SSHCP Plan Area contains Urban Development Area (UDA) and Preserve Planning Units (PPUs). Covered Activities within the UDA include urban development (i.e., construction, use, and maintenance of residential, commercial, and industrial buildings, structures, and associated infrastructure), mining, rural transportation projects, and recycled water projects. Covered Activities outside of the UDA and in the PPUs include preserve management and monitoring; low-impact nature trails; removal or breaching of farm levees; species surveys, monitoring, research, and adaptive management activities; water supply for livestock; groundwater monitoring and extraction wells; pesticide use for land management; detention basins; and existing utility maintenance and repair.

5.3.4 LOCAL

SACRAMENTO COUNTY TREE PRESERVATION ORDINANCE

The Sacramento County Tree Preservation Ordinance (Sacramento County Code of Ordinances Chapter 19.12) was not described in the GPU EIR. This ordinance provides protection for native oak trees (i.e., valley oak [*Quercus lobata*], interior live oak

[*Q. wislizeni*], blue oak [*Q. douglasii*], and oracle oak [*Q. morehus*]). Specifically, protected trees are native oak trees having at least one trunk of 6 inches or greater in diameter measured 4.5 feet above the ground, or multi-trunked native oak trees having an aggregate diameter of 10 inches or more, measured 4.5 feet above the ground.

The Tree Preservation Ordinance prohibits trenching, grading, or fill within the dripline of any protected trees or destruction or removal of any of these trees, in the designated urban area of the unincorporated area of Sacramento County, on any property, public or private, without a tree permit, or unless authorized as a condition of a discretionary project approval by the Board of Supervisors, County Planning Commission, Zoning Board of Appeals, the Zoning Administrator or the Subdivision Review Committee.

SACRAMENTO COUNTY 2030 GENERAL PLAN

The GPU contains the following policies related to biological resources that are applicable to the CAP:

- CO-58.** Ensure no net loss of wetlands, riparian woodlands, and oak woodlands.
- CO-59.** Ensure mitigation occurs for any loss of or modification to the following types of acreage and habitat function:
- vernal pools,
 - wetlands,
 - riparian,
 - native vegetative habitat, and
 - special-status species habitat.
- CO-60.** Mitigation should be directed to lands identified on the Open Space Vision Diagram and associated component maps (please refer to the Open Space Element of the 2030 General Plan).
- CO-61.** Mitigation should be consistent with Sacramento County-adopted habitat conservation plans.
- CO-62.** Permanently protect land required as mitigation.
- CO-63.** Vernal pools, wetlands, and streams within identified preserves shall not be drained, excavated, or filled for the purpose of converting the land to another use. If fill or modification is required for Drainage Master Plans, stormwater quality or levee maintenance, creation or restoration of an equal amount must occur within the boundaries of the preserve to achieve no net loss consistent with policy CO-58.
- CO-65.** Create a network of preserves linked by wildlife corridors of sufficient size to facilitate the movement of species.

- CO-66.** Mitigation sites shall have a monitoring and management program, including an adaptive management component, and an established funding mechanism. The programs shall be consistent with Habitat Conservation Plans that have been adopted or are in draft format.
- CO-67.** Preserves and conservation areas should have an established funding mechanism, and where needed, an acquisition strategy for its operation and management in perpetuity. This includes existing preserves such as the American River Parkway, Dry Creek Parkway, Cosumnes River Preserve and other plans in progress for riparian areas like Laguna Creek.
- CO-68.** Preserves shall be planned and managed to the extent feasible so as to avoid conflicts with adjacent agricultural activities (Please also refer to the Agricultural Element).
- CO-69.** Avoid, to the extent possible, the placement of new major infrastructure through preserves unless located along disturbed areas, such as existing roadways.
- CO-70.** Community Plans, Specific Plans, Master Plans and development projects shall:
- include the location, extent, proximity and diversity of existing natural habitats and special status species in order to determine potential impacts, necessary mitigation and opportunities for preservation and restoration.
 - be reviewed for the potential to identify nondevelopment areas and establish preserves, mitigation banks and restore natural habitats, including those for special status species, considering effects on vernal pools, groundwater, flooding, and proposed fill or removal of wetland habitat.
 - be reviewed for applicability of protection zones identified in this Element, including the Floodplain Protection Zone, Stream Corridor Ordinance, Cosumnes River Protection Combining Zone and the Laguna Creek Combining Zone.
- CO-71.** Development design shall help protect natural resources by:
- Minimizing total built development in the floodplain, while designing areas of less frequent use that can support inundation to be permitted in the floodplain,
 - Ensuring development adjacent to stream corridors and vernal pools provide, where physically reasonable, a public street paralleling at least one side of the corridor with vertical curbs, gutters, foot path, street lighting, and post and cable barriers to prevent vehicular entry.

- Projects adjacent to rivers and streams shall integrate amenities, such as trail connectivity, that will serve as benefits to the community and ecological function.
- Siting of wetlands near residential and commercial areas should consider appropriate measures to minimize potential for mosquito habitation.
- Development adjacent to steam corridors and vernal pools shall be designed in such a manner as to prevent unauthorized vehicular entry into protected areas.

- CO-72.** If land within river and stream watersheds in existing agricultural areas is developed for non-agricultural purposes, the County should actively pursue easement dedication for recreation trails within such development as a condition of approval.
- CO-73.** Secure easement or fee title to open space lands within stream corridors as a condition of development approval.
- CO-74.** Evaluate feasible on-site alternatives early on in the planning process and prior to the environmental review process that reduce impacts on wetland and riparian habitat and provide effective on-site preservation in terms of minimum management requirements, effective size, and evaluation criteria.
- CO-75.** Maintain viable populations of special status species through the protection of habitat in preserves and linked with natural wildlife corridors.
- CO-76.** Habitat conservation plans shall be adopted by the County to provide a comprehensive strategy to protect and aid in the recovery of special status species.
- CO-78.** Plans for urban development and flood control shall incorporate habitat corridors linking habitat sites for special status species. (Please also refer to the Open Space Element for related policies.)
- CO-79.** Manage vegetation on public lands with special status species to encourage locally native species and discourage nonnative invasive species.
- CO-80.** Control human access to sensitive habitat areas on public lands to minimize impact upon and disturbance of special status species.
- CO-81.** Protect sensitive habitat areas on public lands and seek agreements with adjacent property owners to reduce/minimize pesticide and other similar chemical applications.
- CO-82.** Ensure that mosquito control measures have the least effect on non-target species.

- CO-83.** Preserve a representative portion of vernal pool resources across their range by protecting vernal pools on various geologic landforms, vernal pools that vary in depth and size, and vernal pool complexes of varying densities; in order to maintain the ecological integrity of a vernal pool ecosystem.
- CO-84.** Ensure that vernal pool preserves are large enough to protect vernal pool ecosystems that provide intact watersheds and an adequate buffer, have sufficient number and extent of pools to support adequate species populations and a range of vernal pool types.
- CO-85.** Utilize proper vernal pool restoration techniques as approved by United States Fish and Wildlife Service (USFWS), California Department of Fish and Wildlife (CDFW) and the Army Corps of Engineers (CORPS).
- CO-86.** Limit land uses within established preserves to activities deemed compatible with maintenance of the vernal pool resource, which may include ranching, grazing, scientific study and education.
- CO-88.** Where removal of riparian habitat is necessary for channel maintenance, it will be planned and mitigated so as to minimize unavoidable impacts upon biological resources.
- CO-89.** Protect, enhance and maintain riparian habitat in Sacramento County.
- CO-90.** Increase riparian woodland, valley oak riparian woodland and riparian scrub habitat along select waterways within Sacramento County.
- CO-91.** Discourage introductions of invasive non-native aquatic plants and animals.
- CO-92.** Enhance and protect shaded riverine aquatic habitat along rivers and streams.
- CO-93.** Discourage fill in the 100-year floodplain (Please also refer to CO-117).
- CO-94.** Development within the 100-year floodplain and designated floodway of Sacramento streams, sloughs, creeks or rivers shall be:
- Consistent with policies to protect wetlands and riparian areas; and
 - Limited to land uses that can support seasonal inundation.
- CO-95.** Development within the 100-year floodplain should occur in concert with the development of the Floodplain Protection Zone (please refer to Land Uses Adjacent to Rivers and Streams for information on this Zone).
- CO-107.** Maintain and protect natural function of channels in developed, newly developing, and rural areas.

- CO-112.** The use of concrete and impervious materials is discouraged where it is inconsistent with the existing adjacent watercourse and overall ecological function of the stream.
- CO-113.** Encourage revegetation of native plant species appropriate to natural substrate conditions and avoid introduction of nonindigenous species.
- CO-114.** Protect stream corridors to enhance water quality, provide public amenities, maintain flood control objectives, preserve and enhance habitat, and offer recreational and educational opportunities.
- CO-115.** Provide setbacks along stream corridors and stream channels to protect riparian habitat functions (please refer to Figure 1 of the Conservation Element of the 2030 General Plan).
- A functional setback of at least 100 feet and measured from the outside edge of the stream bank should be retained on each side of a stream corridor that prohibits development or agricultural activity. This buffer is necessary to protect riparian functions by allowing for the filtering of sediment, pesticides, phosphorus and nitrogen, organic matter and other contaminants that are known to degrade water quality. This buffer also provides for the protection of vegetation along the stream bank which provides bank stability, erosion control and flood attenuation.
 - A transitional setback of at least 50 feet in width beyond the functional buffer should be retained along all stream corridors. This buffer is necessary to protect hydrogeomorphic functions that regulate water temperature, regulate microclimate, maintain channel complexity and retain hydrologic flow regimes. This buffer also provides corridors to facilitate the movement of wildlife.
 - An extended setback of at least 50 feet in width beyond the transitional setback should be retained along all stream corridors. This setback will allow for recreational uses such as bike, pedestrian and/or equestrian trails and will allow for the placement of infrastructure such as water and sewer lines.
 - Stormwater discharge ponds or other features used for improving stormwater quality may be located within the extended or transitional setback area. However, in order to protect stream habitat and floodplain value, the width of the setback shall not be based upon the width of the pollutant discharge pond. The ponds shall be landscaped and maintained with vegetation native to the surrounding area. Detention ponds or other features implementing pollutant discharge requirements, other than approved regional stormwater quality practices that are designed and operated to complement the corridor functionally and aesthetically, are prohibited.
 - Setback averaging within individual development projects or as otherwise specified in a County-adopted master plan will be permitted

except when riparian woodland will be lost. The minimum width of setbacks cannot fall below 50 feet.

- Master drainage plans may provide for other standards that meet the intent of this policy.

- CO-117.** Public roads, parking, and associated fill slopes shall be located outside of the stream corridor, except at stream crossings and for purposes of extending or setting back levees. The construction of public roads and parking should utilize structural materials to facilitate permeability. Crossings shall be minimized and be aesthetically compatible with naturalistic values of the stream channel.
- CO-118.** Development adjacent to waterways should protect the water conveyance of the system, while preserving and enhancing the riparian habitat and its function.
- CO-120.** Development projects adjacent to rivers and streams shall provide unencumbered maintenance access.
- CO-121.** No grading, clearing, tree cutting, debris disposal or any other despoiling action shall be allowed in rivers and streams except for normal channel maintenance, restoration activities, and road crossings.
- CO-126.** Prohibit obstruction or underground diversion of natural waterways.
- CO-133.** Prohibit native vegetative habitat mitigation and/or other public plantings onto incompatible substrates i.e., tree planting in vernal pool hardpan.
- CO-134.** Maintain and establish a diversity of native vegetative species in Sacramento County.
- CO-135.** Protect the ecological integrity of California Prairie habitat.
- CO-136.** Prohibit the loss of mitigated resource areas.
- CO-137.** Mitigate for the loss of native trees for road expansion and development consistent with General Plan policies and/or the County Tree Preservation Ordinance.
- CO-138.** Protect and preserve non-oak native trees along riparian areas if used by Swainson's hawk, as well as landmark and native oak trees measuring a minimum of 6 inches in diameter or 10 inches aggregate for multi-trunk trees at 4.5 feet above ground.
- CO-139.** Native trees other than oaks, which cannot be protected through development, shall be replaced with in-kind species in accordance with established tree planting specifications, the combined diameter of which shall equal the combined diameter of the trees removed.

- CO-140.** For projects involving native oak woodlands, oak savannah or mixed riparian areas, ensure mitigation through either of the following methods:
- An adopted habitat conservation plan.
 - Ensure no net loss of canopy area through a combination of the following: (1) preserving the main, central portions of consolidated and isolated groves constituting the existing canopy and (2) provide an area onsite to mitigate any canopy lost. Native oak mitigation area must be a contiguous area onsite which is equal to the size of canopy area lost and shall be adjacent to existing oak canopy to ensure opportunities for regeneration.
 - Removal of native oaks shall be compensated with native oak species with a minimum of a one to one diameter at breast height (DBH) replacement.
 - A provision for a comparable onsite area for the propagation of oak trees may substitute for replacement tree planting requirements at the discretion of the County Tree Coordinator when removal of a mature oak tree is necessary.
- CO-141.** In 15 years, the native oak canopy within onsite mitigation areas shall be 50 percent canopy coverage for valley oak and 30 percent canopy coverage for blue oak and other native oaks.
- CO-145.** Removal of non-native tree canopy for development shall be mitigated by creation of new tree canopy equivalent to the acreage of non-native tree canopy removed. New tree canopy acreage shall be calculated using the 15-year shade cover values for tree species.
- CO-146.** If new tree canopy cannot be created onsite to mitigate for the non-native tree canopy removed for new development, project proponents (including public agencies) shall contribute to the Greenprint funding in an amount proportional to the tree canopy of the specific project.
- LU-31.** Strive to achieve a natural nighttime environment and an uncompromised public view of the night sky by reducing light pollution.

5.4 SIGNIFICANCE CRITERIA AND METHODOLOGY

5.4.1 SIGNIFICANCE CRITERIA

Based on Appendix G of the CEQA Guidelines, the project would result in a significant impact related to biological resources if it would:

- have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by CDFW or USFWS;

- have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by CDFW or USFWS;
- have a substantial adverse effect on State or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means;
- interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites;
- conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance; or
- conflict with the provisions of an adopted HCP or other approved local, regional, or State habitat conservation plan.

5.4.2 METHODOLOGY

The CAP is a policy document and does not propose any specific future projects. As described in Chapter 1, “Introduction,” this SEIR considers the broad environmental implications of implementing the CAP on a conceptual basis and does not provide a project-level assessment. Impacts related to biological resources were analyzed based on a review of the proposed CAP measures and actions and their potential to result in physical changes to the environment if the proposed CAP is approved and implemented. Each issue area was analyzed in the context of existing laws, regulations, and plans (including policies adopted in the General Plan), and the extent to which these existing regulations and policies adequately address and minimize the potential for impacts associated with implementation of the proposed CAP. The impact analysis also focuses on whether approval and implementation of the CAP would result in new or more severe biological resources impacts than what were disclosed in the GPU EIR. To determine the significance of an impact to the biological resources, the GPU EIR relied on the policies, codes, and regulations described in the GPU EIR in Section 8, “Biological Resources,” as well as CEQA Sections 15065 and 15382, and the criteria listed in the Appendix G of the State CEQA Guidelines. The GPU EIR combined the relevant significance criteria from these sources to develop two criteria specific to Wetlands and Riparian Areas, and Special Status Species for determining impacts. The GPU EIR also evaluated impacts to Native Trees and Loss of Tree Canopy.

The following impact analysis is informed by databases that address biological resources in the unincorporated Sacramento County, including the CNDDDB and CNPS Inventory of Rare and Endangered Plants (CNDDDB 2024; CNPS 2024). Because this SEIR tiers from the GPU EIR, all relevant GPU EIR mitigation measures have been considered applicable to the proposed CAP, as needed to avoid or minimize project impacts. Because future projects that would be implemented under the CAP have yet to be specifically defined, this SEIR considers the types of impacts that could occur with implementation of proposed CAP measures and actions, with a focus on measures and actions with a potential to result in physical environmental impacts. Future projects

would be evaluated by the County to determine if they are within the scope of this SEIR or if they result in project-specific impacts additional to what is concluded in this analysis. If future projects would result in additional impacts, subsequent CEQA documentation would be required to evaluate the impacts, determine mitigation, and conclude whether impacts are reduced to a less-than-significant level.

5.5 IMPACTS AND ANALYSIS

5.5.1 IMPACT BIO-1: RESULT IN DISTURBANCE OR LOSS OF SPECIAL-STATUS PLANTS OR WILDLIFE AND HABITAT

GENERAL PLAN UPDATE EIR DETERMINATION

As discussed within Chapter 8, “Biological Resources,” of the GPU EIR under “Impact: Special-Status Species,” projects that are developed under the General Plan would be subject to Sacramento County General Plan Conservation Element policies related to special-status species and habitat; mitigation measures included in applicable Master Plan EIRs; existing federal, State, and local regulations and policies; and the requirements of the SSHCP. The GPU EIR concluded that while implementation of mitigation would reduce impacts to the maximum amount feasible, development under the General Plan would result in removal and conversion of special-status species habitats and impacts related to special-status species would be ***significant and unavoidable*** under project and cumulative conditions. The discussion of impacts related to special-status species can be found in Chapter 8, “Biological Resources,” on pages 8-40 through 8-69, 8-81, 8-82 through 8-83, 8-86, and 8-87 through 8-88 of the GPU EIR and is incorporated by reference.

PROPOSED CLIMATE ACTION PLAN IMPACT ANALYSIS

Implementation of the CAP could result in adverse effects on special-status species and critical habitat as several CAP measures could result in physical impacts to the environment from tree planting (Action GHG-02-a, Action GHG-02-c, Action GHG-02-d, Action GHG-02-e, Action GHG-02-f); construction of new renewable energy generation and storage projects (Action GHG-03-b and Action GHG-03-d); installation of EV chargers or hydrogen-fueling infrastructure (Action GHG-07-a, Action GHG-07-b, Action GHG-07-c, Action GHG-07-d, Action GHG-07-e, Action GHG-07-f, Action GHG-07-h, Action GOV-01-d, and Action GOV-03-b); construction of roadways, bikeways, and pedestrian improvements (Action GHG-11-g, TEMP-07-a, and TEMP-07-d); construction and operation of composting facilities (Action GHG 14-a and Action GHG-14-b); installation of signage (Action GOV-01-f); installation of bicycle parking (Action GOV-01-k); installation of solar PV and battery storage (Action GOV-04-a, Action GOV-04-b, TEMP-08-c, TEMP 08-d); removal of existing and installation of new landscaping (Action GOV-05-d, Action GOV-05-e, TEMP-08-f, WATER-04-a, and WATER-04-b); installation of water reuse systems (WATER-02-a, WATER 02-d, and WATER-02-e); and flood protection projects (FLOOD-01-a, FLOOD-05-a, FLOOD-05-b, FLOOD-06-b, FLOOD-07-a, FLOOD-08-b, FLOOD-08-c, FLOOD-10-a, FLOOD-11-a, FLOOD-12-a,

and FLOOD-14-a). Specific locations for these actions have not been identified and are analyzed at a programmatic level. If CAP measures result in physical impacts in areas containing suitable habitat (including critical habitat areas) for special-status species or are in proximity to special-status species occurrences, adverse effects on these sensitive resources could occur. Construction of new facilities including renewable energy generation and storage projects or composting facilities in may result in direct mortality of special-status plant and wildlife species, or loss of their habitat (including critical habitat areas) from vegetation removal, ground disturbance, or construction noise. Installation of new EV chargers or hydrogen-fueling infrastructure; roadways, bikeways, pedestrian improvements; transportation and water infrastructure improvements; implementation of bicycle parking and signage; implementation of solar PV and battery storage; and new landscaping would likely occur in developed areas in Sacramento County, which would limit most impacts on special-status species. However, some special-status plant species and special-status wildlife species could occur in disturbed or developed settings. Noise and visual disturbance from construction of these features may not differ substantially from baseline conditions (e.g., vehicles, pedestrians, other noises associated with urban settings); however, special-status wildlife could be disturbed by these activities if they are located close enough to a nest or burrow.

In addition, implementation of CAP Action GOV-06-a and Action GOV-06-c would replace existing high-pressure sodium (HPS) and mercury-vapor (MV) streetlights and other outdoor lighting at all County owned and managed buildings, facilities, parks, and properties with light-emitting diode (LED) technology. Because LEDs would replace existing lighting, new artificial nighttime lighting would not be introduced. Although these actions would not introduce a new source of light within the county, the character of LED lighting (e.g., warmth, brightness) may be different than HPS or MV lighting and could result in changed or increased nighttime lighting conditions that could adversely affect wildlife. As described in General Plan Policy LU-31, the County would strive to achieve a natural nighttime environment by reducing light pollution from the lighting upgrades at County owned facilities. In addition, Title 1 (General Provisions) of the Zoning Code contains standards requiring that illumination of buildings, landscaping, signs, and parking and loading areas be shielded and directed so that no light trespasses onto adjacent properties (refer to GPU EIR page 16-17). These requirements are anticipated to address any potential effects on wildlife from the conversion to LED lighting.

The activities described above would be required to comply with existing federal, State, and local regulations and policies as described above in the “Regulatory Setting,” as well as the applicable requirements of the SSHCP. These activities would also be consistent with General Plan Policies CO-58, CO-59, CO-61, CO-75, CO-76, and LU-31. Since certification of the GPU EIR, several additional plant and wildlife species are considered special-status species (as identified in Table 5-1 and Table 5-2). The species habitat types are summarized in Table 5-1 and Table 5-2. There could be potential impacts to these species if they occur within areas where proposed CAP measures could result in physical impacts to the environment. However, these additional species would be protected by existing regulations and policies, the requirements of the SSHCP, and

applicable General Plan policies. The GPU EIR examined impacts to biological resources that could result from buildout of new growth areas, planned communities, residential infill, and commercial corridors in the unincorporated county through the year 2030. The types of projects that could result from CAP implementation and the locations of these projects are consistent with those described in the GPU EIR. Additionally, potential impacts to special-status species that could result from future projects that would occur under the CAP would be consistent with and would not increase the severity of impacts described in the GPU EIR. Further, measures that encourage planting of trees, enhancement of the urban forest, and landscaping with native and drought-tolerant vegetation would likely improve habitat for special-status species, particularly wildlife. There would be no new or substantially more severe significant impacts on special-status species (including critical habitat areas) compared to those identified in the certified GPU EIR. The CAP's contribution to impacts would not be substantial; however, impacts would remain ***significant and unavoidable***, as identified in the GPU EIR.

MITIGATION MEASURES

No further mitigation is required.

5.5.2 IMPACT BIO-2: RESULT IN DEGRADATION OR LOSS OF RIPARIAN HABITAT OR OTHER SENSITIVE NATURAL COMMUNITIES

GENERAL PLAN UPDATE EIR DETERMINATION

As discussed within Chapter 8, "Biological Resources," of the GPU EIR under 'Impact: Wetland and Riparian Areas,' "Impact: Impacts to Native Trees," and "Impact: Tree Canopy," projects developed under the General Plan could result in the degradation or loss of riparian habitat or other sensitive natural communities. These projects would be subject to Sacramento County General Plan Conservation Element policies related to riparian habitat and oak woodlands; mitigation measures included in applicable Master Plan EIRs; existing federal, State, and local regulations and policies; as well as the requirements of the SSHCP.

The GPU EIR identified four mitigation measures to reduce the potential for impacts to sensitive natural communities. Mitigation Measure BR-1, related to the loss of native trees, has been incorporated into the General Plan as Policy CO-137. Mitigation Measure BR-2 required amendment of the tree replacement requirements in the County's Landmark and Heritage Tree Protection objective. Mitigation Measures BR-3 and BR-4 related to the loss of tree canopy were incorporated into the General Plan as Policies CO-145 and CO-146, respectively. Consistency with these mitigation measures is addressed through project-level assessment of consistency with the General Plan. The GPU EIR concluded that while implementation of these mitigation measures, would reduce impacts to the maximum amount feasible, impacts related to riparian habitat and native trees, including oak woodlands, would be ***significant and unavoidable*** under both project and cumulative conditions.

The discussion of impacts related to wetlands and riparian habitat can be found in Chapter 8, "Biological Resources," on pages 8-31 through 8-40, 8-81, 8-82, 8-83

through 8-85, and 8-87 of the GPU EIR. The discussion of impacts and mitigation measures related to native trees and loss of tree canopy can be found in Section 8, “Biological Resources,” on pages 8-69 through 8-83, 8-86, and 8-88 through 8-89 of the GPU EIR. These discussions and mitigation measures are incorporated by reference.

PROPOSED CLIMATE ACTION PLAN IMPACT ANALYSIS

Implementation of the proposed CAP could result in adverse effects to riparian habitat and other sensitive natural communities (as described above), including oak woodlands. Several CAP measures could result in physical impacts to the environment from tree planting (Action GHG-02-a, Action GHG-02-c, Action GHG-02-d, Action GHG-02-e, Action GHG-02-f); construction of new renewable energy generation and storage projects (Action GHG-03-b and Action GHG-03-d); installation of EV chargers or hydrogen-fueling infrastructure (Action GHG-07-a, Action GHG-07-b, Action GHG-07-c, Action GHG-07-d, Action GHG-07-e, Action GHG-07-f, Action GHG-07-h, Action GOV-01-d, and Action GOV-03-b); construction of roadways, bikeways, and pedestrian improvements (Action GHG-11-g, TEMP-07-a, and TEMP-07-d); construction and operation of composting facilities (Action GHG-14-a and Action GHG-14-b); installation of signage (Action GOV-01-f); installation of bicycle parking (Action GOV-01-k); installation of solar PV and battery storage (Action GOV-04-a, Action GOV-04-b, TEMP-08-c, and TEMP 08-d); removal of existing and installation of new landscaping (Action GOV-05-d, Action GOV-05-e, TEMP-08-f, WATER-04-a, and WATER-04-b); installation of water reuse systems (WATER-02-a, WATER 02-d, and WATER-02-e); and flood protection projects (FLOOD-01-a, FLOOD-05-a, FLOOD-05-b, FLOOD-06-b, FLOOD-07-a, FLOOD-08-b, FLOOD-08-c, FLOOD-10-a, FLOOD-11-a, FLOOD-12-a, and FLOOD-14-a). Specific locations for these actions have not been identified; however, if these activities occur in areas containing riparian habitat or other sensitive natural communities including oak woodlands, adverse effects on these sensitive communities could occur. Construction of new facilities such as renewable energy generation and storage projects and composting facilities could result in direct loss of riparian habitat, other sensitive natural communities, oak woodlands, or native oak trees from vegetation removal or ground disturbance. Installation of new EV chargers or hydrogen-fueling infrastructure; roadways, bikeways, pedestrian improvements; transportation and water infrastructure improvements; implementation of bicycle parking and signage; implementation of solar PV and battery storage; and new landscaping would likely occur in already developed areas in Sacramento County, which would limit most impacts on riparian habitat and sensitive natural communities. However, oak trees may be present in developed settings.

Future projects that could occur from implementation of the proposed CAP actions and measures would be required to comply with existing federal, State, and local regulations and policies, as well as the applicable requirements of the SSHCP. These activities would also be consistent with General Plan Policies CO-58, CO-59, CO-61, CO-62, CO-63, CO-66, CO-71, CO-74, CO-88, CO-89, CO-90, CO-91, CO-92, CO-114, CO-115, CO-117, CO-118, CO-134, CO-135, CO-137, CO-138, CO-139, CO-140, CO-145, and CO-146. The GPU EIR examined impacts to biological resources that could result from buildout of new growth areas, planned communities, residential infill, and commercial corridors in the unincorporated county. The types of projects that would result from CAP

implementation and the locations of these projects are consistent with those described in the GPU EIR and potential impacts to riparian habitat and sensitive natural communities that could result from CAP implementation would be consistent with the impacts described in the GPU EIR. Therefore, there would be no new or substantially more severe significant impacts on riparian habitat or other sensitive natural communities compared to those identified in the certified GPU EIR. The CAP's contribution to impacts would not be substantial; however, impacts would remain **significant and unavoidable**, as identified in the GPU EIR.

MITIGATION MEASURES

No further mitigation is required.

5.5.3 IMPACT BIO-3: RESULT IN DEGRADATION OR LOSS OF STATE OR FEDERALLY PROTECTED WETLANDS

GENERAL PLAN UPDATE EIR DETERMINATION

As discussed within Chapter 8, "Biological Resources," of the GPU EIR under "Impact: Wetland and Riparian Areas," projects developed under the General Plan would be subject to Sacramento County General Plan Conservation Element policies related to wetlands; mitigation measures included in applicable Master Plan EIRs; existing federal, State, and local regulations and policies; and applicable requirements of the SSHCP. The GPU EIR concluded that while implementation of mitigation measures included in applicable Master Plan EIRs would reduce impacts to the maximum amount feasible, impacts related to wetlands would be **significant and unavoidable** under both project and cumulative conditions. The discussion of impacts related to State and federally protected wetlands can be found in Chapter 8, "Biological Resources," on pages 8-31 through 8-40, 8-81, 8-82, 8-83 through 8-85, and 8-87 of the GPU EIR and is incorporated by reference.

PROPOSED CLIMATE ACTION PLAN IMPACT ANALYSIS

Implementation of the CAP could result in adverse effects to wetlands. Several CAP measures could result in physical impacts to the environment from tree planting (Action GHG-02-a, Action GHG-02-c, Action GHG-02-d, Action GHG-02-e, Action GHG-02-f); construction of new renewable energy generation and storage projects (Action GHG-03-b and Action GHG-03-d); installation of EV chargers or hydrogen-fueling infrastructure (Action GHG-07-a, Action GHG-07-b, Action GHG-07-c, Action GHG-07-d, Action GHG-07-e, Action GHG-07-f, Action GHG-07-h, Action GOV-01-d, and Action GOV-03-b); construction of roadways, bikeways, and pedestrian improvements (Action GHG-11-g, TEMP-07-a, and TEMP-07-d); construction and operation of composting facilities (Action GHG-14-a and Action GHG-14-b); installation of signage (Action GOV-01-f); installation of bicycle parking (Action GOV-01-k); installation of solar PV and battery storage (Action GOV-04-a, Action GOV-04-b, TEMP-08-c, and TEMP 08-d); removal of existing and installation of new landscaping (Action GOV-05-d, Action GOV-05-e, TEMP-08-f, WATER-04-a, and WATER-04-b); installation of water reuse systems (WATER-02-a, WATER 02-d, and WATER-02-e); and flood protection projects (FLOOD-01-a, FLOOD-05-a, FLOOD-05-b, FLOOD-06-b, FLOOD-07-a, FLOOD-08-b,

FLOOD-08-c, FLOOD-10-a, FLOOD-11-a, FLOOD-12-a, and FLOOD-14-a). Specific locations for these actions have not been identified. If these activities occur in areas that contain mapped wetland habitat or in undeveloped areas where State or federally protected wetlands have not been previously identified, adverse effects on wetlands could occur. Certain projects that could occur under implementation of the CAP including construction of new facilities such as renewable energy generation and storage projects and composting facilities may result in direct loss of State or federally protected wetlands. However, other projects including installation of new EV chargers or hydrogen-fueling infrastructure; roadways, bikeways, pedestrian improvements; transportation and water infrastructure improvements; implementation of bicycle parking and signage; implementation of solar PV and battery storage; and new landscaping would likely occur in already developed areas in Sacramento County, and it is unlikely that wetlands would be present in these areas. Thus, these activities are not expected to result in impacts to wetlands.

Activities that implement the CAP measures would be required to comply with existing federal, State, and local regulations and policies, as well as the applicable requirements of the SSHCP. These activities would also be consistent with General Plan Policies CO-58, CO-59, CO-61, CO-62, CO-63, CO-71, CO-74, CO-115, CO-121, and CO-126. The GPU EIR examined impacts to biological resources that could result from buildout of new growth areas, planned communities, residential infill, and commercial corridors in the unincorporated county through the plan horizon. The types of projects that would result from CAP implementation and the locations of these projects are consistent with those described in the GPU EIR. Additionally, impacts to wetlands that could result from CAP implementation would be consistent with and would not increase the severity of impacts as described in the GPU EIR. Therefore, there would be no new or substantially more severe significant impacts on State or federally protected wetlands compared to those identified in the certified GPU EIR. The CAP's contribution to impacts would not be substantial; however, impacts would remain *significant and unavoidable*, as identified in the GPU EIR.

MITIGATION MEASURES

No further mitigation is required.

5.5.4 IMPACT BIO-4: INTERFERE WITH WILDLIFE MOVEMENT CORRIDORS OR IMPEDE THE USE OF WILDLIFE NURSERIES

GENERAL PLAN UPDATE EIR DETERMINATION

Impacts to wildlife corridors and sensitive habitats that may be used as wildlife nurseries were addressed in Chapter 8, "Biological Resources," of the GPU EIR under "Impact: Special-Status Species." The analysis described impacts to special-status species in the New Growth Areas and Commercial Corridors, which both have contiguous undeveloped land that provides habitat for listed species to persist within an area. The analysis also described impacts to nesting bird species. As discussed under this impact, projects under the General Plan would be subject to Sacramento County General Plan Conservation Element policies regarding wildlife habitat and wildlife corridors; mitigation

measures included in applicable Master Plan EIRs; and existing federal, State, and local regulations and policies. The GPU EIR concluded that while implementation of mitigation measures included in applicable Master Plan EIRs would reduce impacts to the maximum amount feasible, development under the General Plan would result in removal and conversion of special-status species habitats, which may support wildlife corridors or wildlife nursery sites, and impacts would be **significant and unavoidable** under both project and cumulative conditions. The discussion of impacts related to special-status species (thus, wildlife movement and nurseries) can be found in Chapter 8, “Biological Resources,” on pages 8-40 through 8-69, 8-81, 8-82 through 8-83, 8-86, and 8-87 through 8-88 of the GPU EIR and is incorporated by reference.

PROPOSED CLIMATE ACTION PLAN IMPACT ANALYSIS

Implementation of the CAP could result in adverse effects wildlife movement corridors or impede use of wildlife nurseries. Several CAP measures and actions could result in physical impacts to the environment from tree planting (Action GHG-02-a, Action GHG-02-c, Action GHG-02-d, Action GHG-02-e, Action GHG-02-f); construction of new renewable energy generation and storage projects (Action GHG-03-b and Action GHG-03-d); installation of EV chargers or hydrogen-fueling infrastructure (Action GHG-07-a, Action GHG-07-b, Action GHG-07-c, Action GHG-07-d, Action GHG-07-e, Action GHG-07-f, Action GHG-07-h, Action GOV-01-d, and Action GOV-03-b); construction of roadways, bikeways, and pedestrian improvements (Action GHG-11-g, TEMP-07-a, and TEMP-07-d); construction and operation of composting facilities (Action GHG-14-a and Action GHG-14-b); installation of signage (Action GOV-01-f); installation of bicycle parking (Action GOV-01-k); installation of solar PV and battery storage (Action GOV-04-a, Action GOV-04-b, TEMP-08-c, and TEMP 08-d); removal of existing and installation of new landscaping (Action GOV-05-d and Action GOV-05-e, TEMP-08-f, WATER-04-a, and WATER-04-b); installation of water reuse systems (WATER-02-a, WATER 02-d, and WATER-02-e); and flood protection projects (FLOOD-01-a, FLOOD-05-a, FLOOD-05-b, FLOOD-06-b, FLOOD-07-a, FLOOD-08-b, FLOOD-08-c, FLOOD-10-a, FLOOD-11-a, FLOOD-12-a, and FLOOD-14-a). Specific locations for these actions have not been identified.

If CAP measures result in physical impacts within wildlife movement corridors or areas used as wildlife nurseries (e.g., tree groves used as heron rookeries, bat roost habitat), nesting birds, disruption of wildlife movement or adverse effects on wildlife nurseries could occur. Construction of new facilities including renewable energy generation and storage projects, or composting facilities may result in loss of wildlife movement corridors or areas used as wildlife nurseries from vegetation removal or ground disturbance. Installation of new EV chargers or hydrogen-fueling infrastructure; roadways, bikeways, pedestrian improvements; transportation and water infrastructure improvements; implementation of bicycle parking and signage; implementation of solar PV and battery storage; and new landscaping would likely occur in developed areas in Sacramento County, which would limit most impacts on wildlife movement corridors. Noise and visual disturbance from construction of these features may not differ substantially from baseline conditions (e.g., vehicles, pedestrians, other noises associated with urban settings); however, nesting birds could be disturbed by these activities if they are located close enough to a nest.

In addition, implementation of Measure GOV-06-a and Measure GOV-06-c would replace existing high-pressure sodium HPS and MV streetlights and other outdoor lighting at all County owned and managed buildings, facilities, parks, and properties with LED lighting. Because LEDs would replace existing lighting under the CAP, new artificial nighttime lighting would not be introduced. Although these actions would not introduce a new source of light within the county, the character of LED lighting (e.g., warmth, brightness) may be different than HPS or MV lighting, potentially resulting in changed or increased nighttime lighting conditions that could adversely affect wildlife movement due to light pollution. As described above in Impact BIO-1, all lighting would be installed under these programs would be consistent with General Plan Policy LU-31 and would be required to comply with the lighting standards included in the zoning code. Use of LED lighting and compliance with these county policies is fully evaluated in the GPU EIR (refer to GPU EIR page 16-17) and the shift to energy efficient lighting through CAP implementation would not generate potential effects that exceed the scope of the GPU EIR analysis.

Activities that would occur under the CAP would be required to comply with existing federal, State, and local regulations and policies protecting nesting birds and habitats that likely function as wildlife corridors or wildlife nursery sites (e.g., streams, riparian habitat), as well as the applicable requirements of the SSHCP. These activities would also be consistent with General Plan Policies CO-58, CO-59, CO-61, CO-62, CO-65, CO-69, CO-75, CO-78, CO-115, and CO-118. The GPU EIR examined impacts to biological resources that could result from buildout of new growth areas, planned communities, residential infill, and commercial corridors in the unincorporated county. The types of projects that would result from CAP implementation and the locations of these projects are consistent with those described in the GPU EIR. Additionally, potential impacts to nesting birds, wildlife corridors, and wildlife nursery sites resulting from projects under the CAP would be consistent with and would not increase the severity of impacts described in the GPU EIR. Therefore, there would be no new or substantially more severe significant impacts on nesting birds, wildlife movement corridors, or wildlife nursery sites compared to those identified in the certified GPU EIR. The CAP's contribution to impacts would not be substantial; however, impacts would remain ***significant and unavoidable***, as identified in the GPU EIR.

MITIGATION MEASURES

No further mitigation is required.

5.5.5 IMPACT BIO-5: CONFLICT WITH LOCAL POLICIES AND ORDINANCES

GENERAL PLAN UPDATE EIR DETERMINATION

Consistency with local policies and ordinances is discussed within Chapter 8, "Biological Resources," of the GPU EIR under "Impact: Impacts to Native Trees" and "Impact: Tree Canopy." As described, projects developed under the General Plan would be subject to Sacramento County 1993 General Plan Conservation Element policies regarding native vegetation protection, restoration, and enhancement of landmark and heritage tree protection; mitigation measures included in applicable Master Plan EIRs; and local regulations and policies, including the Swainson Hawk Impact Mitigation Fee Ordinance, and Greenprint. In addition, the GPU EIR would implement Mitigation

Measures BR-1, BR-2, BR-3, and BR-4. As described above, these measures resulted in new and revised General Plan policies. The GPU EIR concluded that while implementation of mitigation measures would reduce impacts to the maximum amount feasible, impacts related to native trees and tree canopy would conflict with the 1993 General Plan Conservation Element policies regarding landmark and heritage tree protection, and therefore be **significant and unavoidable** under both project and cumulative conditions. The discussion of impacts and mitigation measures related to native trees and loss of tree canopy can be found in Section 8, “Biological Resources,” on pages 8-69 through 8-83, 8-86, and 8-88 through 8-89 of the GPU EIR. These discussions and mitigation measures are incorporated by reference.

PROPOSED CLIMATE ACTION PLAN IMPACT ANALYSIS

Local plans and policies that are applicable to the project include those described in the GPU EIR and the Sacramento County Tree Preservation Ordinance. As described in the Regulatory Setting above, the Tree Preservation Ordinance provides for the protection of native oak trees. Several CAP measures and actions could result in physical impacts to the environment including tree planting (Action GHG-02-a, Action GHG-02-c, Action GHG-02-d, Action GHG-02-e, Action GHG-02-f); construction of new renewable energy generation and storage projects (Action GHG-03-b and Action GHG-03-d); installation of EV chargers or hydrogen-fueling infrastructure (Action GHG-07-a, Action GHG-07-b, Action GHG-07-c, Action GHG-07-d, Action GHG-07-e, Action GHG-07-f, Action GHG-07-h, Action GOV-01-d, and Action GOV-03-b); construction of roadways, bikeways, and pedestrian improvements (Action GHG-11-g, TEMP-07-a, and TEMP-07-d); construction and operation of composting facilities (Action GHG-14-a and Action GHG-14-b); installation of signage (Action GOV-01-f); installation of bicycle parking (Action GOV-01-k); installation of solar PV and battery storage (Action GOV-04-a, Action GOV-04-b, TEMP-08-c, and TEMP 08-d); and removal of existing and installation of new landscaping (Action GOV-05-d, Action GOV-05-e, TEMP-08-f, WATER-04-a, and WATER-04-b); installation of water reuse systems (WATER-02-a, WATER 02-d, and WATER-02-e); and flood protection projects (FLOOD-01-a, FLOOD-05-a, FLOOD-05-b, FLOOD-06-b, FLOOD-07-a, FLOOD-08-b, FLOOD-08-c, FLOOD-10-a, FLOOD-11-a, FLOOD-12-a, and FLOOD-14-a). Specific locations for these actions have not been identified. These activities could result in removal of native vegetation, including landmark and heritage trees as defined under the Sacramento County Tree Preservation Ordinance. Removal of heritage trees would conflict with the ordinance, and this would be a significant impact.

Projects that implement CAP measures and actions would comply with local regulations and policies, including the County Tree Preservation Ordinance, as revised through the GPU EIR mitigation measures identified above. These activities would also be consistent with General Plan Policies CO-137, CO-138, CO-139, CO-140, CO-141, CO-145, and CO-146. As future projects that could occur from CAP implementation would comply with the County Tree Preservation Ordinance and General Plan, there would be no conflict with local policies or ordinances. Therefore, there would be no new or substantially more severe significant impacts related to conflict with local policies or ordinances compared to those identified in the certified GPU EIR. The CAP’s contribution to impacts would not be substantial; however, impacts would remain **significant and unavoidable**, as identified in the GPU EIR.

MITIGATION MEASURES

No further mitigation is required.

5.5.6 IMPACT BIO-6: CONFLICT WITH AN ADOPTED HABITAT CONSERVATION PLAN

GENERAL PLAN UPDATE EIR DETERMINATION

The SSHCP was discussed in the “Regulatory Setting” (pages 8-27 through 8-28), the “Proposed Framework for Management of Biological Resources” (pages 8-27 through 8-28), and “Impact: Wetland and Riparian Areas” (pages 8-31 through 8-40) of the GPU EIR. However, because the SSHCP was not adopted at the time that the GPU EIR was prepared, General Plan consistency with the SSHCP was not evaluated.

PROPOSED CLIMATE ACTION PLAN IMPACT ANALYSIS

Since certification of the GPU EIR, the SSHCP has been adopted and is now being implemented. Sacramento County is a participant in the SSHCP, and all urban development projects in the Urban Development Area and rural transportation projects that require a master plan, use permits, grading permits, or building permits would be required to participate in the SSHCP and would be subject to fees if covered species and habitat impacts would occur as a result of project implementation. The SSHCP was developed as a comprehensive mitigation and preservation strategy that is compatible with projected development in the region.

Projects located in the SSHCP Plan Area would be required to comply with the SSHCP, including those implemented as part of the CAP. Projects are required to submit a SSHCP Permit Application Form, and as part of the permit authorization under the SSHCP, these projects would likely be subject to SSHCP Avoidance and Minimization Measures (AMM) and payment of mitigation fees. These activities would also be consistent with General Plan Policies CO-61, CO-66, CO-76, and CO-140, which require compliance with the SSHCP. As future projects that could occur from CAP implementation would comply with the SSHCP, there would be no conflict with the provisions of the SSHCP. Impacts would be ***less than significant***.

MITIGATION MEASURES

No mitigation is required.

Table 5-1: Special-Status Plant Species Known to Occur in Sacramento County

Species	Listing Status ¹ Federal	Listing Status ¹ State	CRPR	Habitat	Included in GPU EIR
Large-flowered fiddleneck <i>Amsinckia grandiflora</i>	FE	SE	1B.1	Cismontane woodland, and valley and foothill grassland. Annual grassland in various soils. 900–1,805 feet in elevation. Blooms April–May. Annual.	No

Species	Listing Status ¹ Federal	Listing Status ¹ State	CRPR	Habitat	Included in GPU EIR
lone manzanita <i>Arctostaphylos myrtifolia</i>	FT	—	1B.2	Chaparral, cismontane woodland. On lone clay with chaparral associates. Often comprises 50-80 percent cover. 295–1,835 feet in elevation. Blooms November–March. Perennial.	No
Watershield <i>Brasenia schreberi</i>	—	—	2B.3	Freshwater marshes and swamps. Aquatic from water bodies both natural and artificial in California. 100–7,220 feet in elevation. Blooms June–September. Geophyte.	No
Stebbins' morning-glory <i>Calystegia stebbinsii</i>	FE	SE	1B.1	Chaparral, cismontane woodland. On red clay soils of the Pine Hill formation; gabbro or serpentine; open areas. 985–2,380 feet in elevation. Blooms April–July. Geophyte.	No
Bristly sedge <i>Carex comosa</i>	—	—	2B.1	Lake margins, wet places; sites below sea level on a Delta island. 15–5,315 feet in elevation. Blooms May–September. Geophyte.	No
Pine Hill ceanothus <i>Ceanothus roderickii</i>	FE	SR	1B.1	Chaparral, cismontane woodland. Gabbroic or serpentine soils; often in "historically disturbed" areas with an ensemble of other rare plants. 855–2,065 feet in elevation. Blooms April–June. Perennial.	No
Soft salty bird's-beak <i>Chloropyron molle</i> ssp. <i>molle</i>	FE	SR	1B.2	In coastal salt marsh with <i>Distichlis</i> spp., <i>Salicornia</i> spp., and <i>Frankenia</i> spp. 0–15 feet in elevation. Blooms July–November. Annual.	No
Palmate-bracted bird's-beak <i>Chloropyron palmatum</i>	FE	SE	1B.1	Chenopod scrub, valley and foothill grassland, meadow and seep, wetland. Usually on Pescadero silty clay, which is alkaline, with <i>Distichlis</i> spp., <i>Frankenia</i> spp. 15–510 feet in elevation. Blooms May–October. Annual.	No
Bolander's water-hemlock <i>Cicuta maculata</i> var. <i>bolanderi</i>	—	—	2B.1	Marshes and swamps, fresh or brackish water. 0–655 feet in elevation. Blooms July–September. Perennial.	No
Hoover's cryptantha <i>Cryptantha hooveri</i>	—	—	1A	Valley and foothill grassland, inland dunes. In coarse sand. 30–490 feet in elevation. Blooms April–May. Annual.	No
Peruvian dodder <i>Cuscuta obtusiflora</i> var. <i>glandulosa</i>	—	—	2B.2	Freshwater marsh. 50–920 feet in elevation. Blooms July–October. Annual.	No
Dwarf downingia <i>Downingia pusilla</i>	—	—	2B.2	Vernal lake and pool margins with a variety of associates. In several types of vernal pools. 5–1,610 feet in elevation. Blooms March–May. Annual.	Yes

Species	Listing Status ¹ Federal	Listing Status ¹ State	CRPR	Habitat	Included in GPU EIR
lone buckwheat <i>Eriogonum apricum</i> var. <i>apricum</i>	FE	SE	1B.1	Chaparral. In gravelly openings on lone formation soil. 280–490 feet in elevation. Blooms July–October. Perennial.	No
Tuolumne button-celery <i>Eryngium pinnatisectum</i>	—	—	1B.2	Volcanic soils; vernal pools and mesic sites within other natural communities. 230–3,000 feet in elevation. Blooms May–August. Annual/Perennial.	No
San Joaquin spearscale <i>Extriplex joaquinana</i>	—	—	1B.2	In seasonal alkali wetlands or alkali sink scrub with <i>Distichlis spicata</i> , and <i>Frankenia</i> spp. 5–2,740 feet in elevation. Blooms April–October. Annual.	No
Pine Hill flannelbush <i>Fremontodendron decumbens</i>	FE	SR	1B.2	Rocky ridges; gabbro or serpentine endemic; often among rocks and boulders. 1,395–2,510 feet in elevation. Blooms April–July. Perennial.	No
El Dorado bedstraw <i>Galium californicum</i> ssp. <i>sierrae</i>	FE	SR	1B.2	In pine-oak woodland or chaparral. Restricted to gabbroic or serpentine soils. 425–1,920 feet in elevation. Blooms May–June. Perennial.	No
Boggs Lake hedge-hyssop <i>Gratiola heterosepala</i>	—	SE	1B.2	Clay soils; usually in vernal pools, sometimes on lake margins. 35–7,790 feet in elevation. Blooms April–August. Annual.	Yes
Woolly rose-mallow <i>Hibiscus lasiocarpus</i> var. <i>occidentalis</i>	—	—	1B.2	Moist, freshwater-soaked riverbanks and low peat islands in sloughs; can also occur on riprap and levees. In California, known from the Delta watershed. 0–510 feet in elevation. Blooms June–September. Geophyte.	No
Northern California black walnut <i>Juglans hindsii</i>	—	—	—	Deep alluvial soil, associated with a creek or stream. 0–2,100 feet in elevation. Blooms April–May. Perennial.	Yes
Ahart's dwarf rush <i>Juncus leiospermus</i> var. <i>ahartii</i>	—	—	1B.2	Valley and foothill grassland. Restricted to the edges of vernal pools in grassland. 100–330 feet in elevation. Blooms March–May. Annual.	No
Alkali-sink goldfields <i>Lasthenia chrysantha</i>	—	—	1B.1	Vernal pools. Alkaline. 0–655 feet in elevation. Blooms February–June. Annual.	No
Delta tule pea <i>Lathyrus jepsonii</i> var. <i>jepsonii</i>	—	—	1B.2	Freshwater and brackish marshes. Usually on marsh and slough edges. 0–15 feet in elevation. Blooms May–July. Perennial.	Yes

Species	Listing Status ¹ Federal	Listing Status ¹ State	CRPR	Habitat	Included in GPU EIR
Legenere <i>Legenere limosa</i>	—	—	1B.1	In beds of vernal pools. 5–2,885 feet in elevation. Blooms April–June. Annual.	Yes
Heckard's peppergrass <i>Lepidium latipes</i> var. <i>heckardii</i>	—	—	1B.2	Grassland, and sometimes vernal pool edges. Alkaline soils. 5–100 feet in elevation. Blooms March–May. Annual.	No
Mason's lillaeopsis <i>Lillaeopsis masonii</i>	—	SR	1B.1	Freshwater and brackish marshes, riparian scrub. Tidal zones, in muddy or silty soil formed through river deposition or riverbank erosion. 0–35 feet in elevation. Blooms April–November. Geophyte.	Yes
Delta mudwort <i>Limosella australis</i>	—	—	2B.1	Riparian scrub, marshes, and swamps. Usually on mud banks of the Delta in marshy or scrubby riparian associations; often with <i>Lillaeopsis masonii</i> . 0–15 feet in elevation. Blooms May–August. Perennial.	No
Lassics lupine <i>Lupinus constancei</i>	FP	SE	1B.1	Lower montane coniferous forest. Serpentine barrens. 4,920–6,560 feet in elevation. Blooms July. Perennial.	No
Pincushion navarretia <i>Navarretia myersii</i> ssp. <i>myersii</i>	—	—	1B.1	Vernal pools, wetland. Clay soils within non-native grassland. 150–330 feet in elevation. Blooms April–May. Annual.	Yes
Antioch Dunes evening-primrose <i>Oenothera deltoides</i> ssp. <i>howellii</i>	FE	SE	1B.1	Interior dunes. Remnant river bluffs and sand dunes east of Antioch. 0–100 feet in elevation. Blooms March–September. Perennial.	No
Slender Orcutt grass <i>Orcuttia tenuis</i>	FT	SE	1B.1	Vernal pools, wetland. Often in gravelly substrate. 80–5,760 feet in elevation. Blooms May–September. Annual.	Yes
Sacramento Orcutt grass <i>Orcuttia viscida</i>	FE	SE	1B.1	Vernal pools, wetland. 50–280 feet in elevation. Blooms April–July. Annual.	Yes
Bearded popcornflower <i>Plagiobothrys hystriculus</i>	—	—	1B.1	Vernal pools, valley and foothill grassland. Wet sites. 0–900 feet in elevation. Blooms April–May. Annual.	No
Sanford's arrowhead <i>Sagittaria sanfordii</i>	—	—	1B.2	In standing or slow-moving freshwater ponds, marshes, and ditches. 0–2,135 feet in elevation. Blooms May–October. Geophyte.	No

Species	Listing Status ¹ Federal	Listing Status ¹ State	CRPR	Habitat	Included in GPU EIR
Marsh skullcap <i>Scutellaria galericulata</i>	—	—	2B.2	Swamps and wet places. 0–6,400 feet in elevation. Blooms June–September. Geophyte.	No
Side-flowering skullcap <i>Scutellaria lateriflora</i>	—	—	2B.2	Wet meadows and marshes. In the Delta, often found on logs. 0–1,640 feet in elevation. Blooms July–September. Geophyte.	No
Suisun Marsh aster <i>Symphotrichum lentum</i>	—	—	1B.2	Most often seen along sloughs. 0–100 feet in elevation. Blooms May–November. Geophyte.	Yes
Saline clover <i>Trifolium hydrophilum</i>	—	—	1B.2	Marshes and swamps, valley and foothill grassland, vernal pools. Mesic, alkaline sites. 0–985 feet in elevation. Blooms April–June. Annual.	No

Notes: CEQA = California Environmental Quality Act; CRPR = California Rare Plant Rank; ESA = Endangered Species Act; NPPA = Native Plant Protection Act

¹ Legal Status Definitions

Federal:

- FE Federally Listed as Endangered (legally protected by ESA)
- FT Federally Listed as Threatened (legally protected by ESA)

State:

- SE State Listed as Endangered (legally protected by CESA)
- SR State Listed as Rare (legally protected by NPPA)

California Rare Plant Ranks (CRPR):

- 1A Plants presumed to be extinct in California.
- 1B Plant species considered rare or endangered in California and elsewhere (protected under CEQA, but not legally protected under ESA or CESA).
- 2B Plant species considered rare or endangered in California but more common elsewhere (protected under CEQA, but not legally protected under ESA or CESA).

CRPR Threat Ranks:

- 0.1 Seriously threatened in California (over 80% of occurrences threatened; high degree and immediacy of threat)
- 0.2 Moderately threatened in California (20-80% occurrences threatened; moderate degree and immediacy of threat)
- 0.3 Not very threatened in California (less than 20% of occurrences threatened/ low degree and immediacy of threat or no current threats known)

Sources: CNDDDB 2024; CNPS 2024.

Table 5-2: Special-Status Wildlife Species Known to Occur in Sacramento County

Species	Listing Status ¹ Federal	Listing Status ¹ State	Habitat	Included in GPU EIR
Amphibians and Reptiles				
California red-legged frog <i>Rana draytonii</i>	FT	SSC	Lowlands and foothills in or near permanent sources of deep water with dense, shrubby, or emergent riparian vegetation. Requires 11-20 weeks of permanent water for larval development. Must have access to estivation habitat.	No
California tiger salamander - central California DPS <i>Ambystoma californiense</i> pop. 1	FT	ST	Lives in vacant or mammal-occupied burrows throughout most of the year; in grassland, savanna, or open woodland habitats. Need underground refuges, especially ground squirrel burrows, and vernal pools or other seasonal water sources for breeding.	Yes
Foothill yellow-legged frog (South Sierra DPS) <i>Rana boylei</i> pop. 5	FE	SE	Sierra Nevada from South Fork American River subbasin (HU 8) in El Dorado County south to Tehachapi Mountains in Kern County. Partly shaded shallow streams and riffles with a rocky substrate in a variety of habitats. Needs at least some cobble-sized substrate for egg-laying and at least 15 weeks to attain metamorphosis.	No
Giant garter snake <i>Thamnophis gigas</i>	FT	ST	Prefers freshwater marsh and low gradient streams. Has adapted to drainage canals and irrigation ditches. This is the most aquatic of the garter snakes in California.	Yes
Western pond turtle <i>Emys marmorata</i>	FP	SSC	Ponds, marshes, rivers, streams, and irrigation ditches, usually with aquatic vegetation, below 6,000 ft elevation. Needs basking sites and suitable (sandy banks or grassy open fields) upland habitat up to approximately 0.3 mile (0.5 km) from water for egg-laying.	Yes
Western spadefoot <i>Spea hammondi</i>	FP	SSC	Occurs primarily in grassland habitats but can be found in valley-foothill hardwood woodlands. Vernal pools are essential for breeding and egg-laying.	Yes

Species	Listing Status ¹ Federal	Listing Status ¹ State	Habitat	Included in GPU EIR
Birds				
American peregrine falcon <i>Falco peregrinus anatum</i>	FD BCC	SD	Near wetlands, lakes, rivers, or other water; on cliffs, banks, dunes, mounds; also, human-made structures. Nest consists of a scrape or a depression or ledge in an open site.	Yes
American white pelican <i>Pelecanus erythrorhynchos</i>	—	SSC	Colonial nester on large interior lakes. Nests on large lakes, providing safe roosting and breeding places in the form of well-sequestered islets.	Yes
Bald eagle <i>Haliaeetus leucocephalus</i>	FD BCC	SE FP	Ocean shore, lake margins, and rivers for both nesting and wintering. Most nests are within 1 mile of water. Nests in large, old-growth, or dominant live tree with open branches, especially ponderosa pine. Roosts communally in winter.	Yes
Bank swallow <i>Riparia riparia</i>	—	ST	Colonial nester; nests primarily in riparian and other lowland habitats west of the desert. Requires vertical banks/cliffs with fine-textured/sandy soils near streams, rivers, lakes, ocean to dig nesting hole.	Yes
Burrowing owl <i>Athene cunicularia</i>	BCC	SSC	Open, dry annual or perennial grasslands, deserts and scrublands characterized by low-growing vegetation. Subterranean nester, dependent upon burrowing mammals, most notably, the California ground squirrel.	No
California black rail <i>Laterallus jamaicensis coturniculus</i>	BCC	ST FP	Inhabits freshwater marshes, wet meadows and shallow margins of saltwater marshes bordering larger bays. Needs water depths of about 1 inch that do not fluctuate during the year and dense vegetation for nesting habitat.	No
California Ridgway's rail <i>Rallus obsoletus obsoletus</i>	FE	SE FP	Salt-water and brackish marshes traversed by tidal sloughs in the vicinity of San Francisco Bay. Associated with abundant growths of pickleweed but feeds away from cover on invertebrates from mud-bottomed sloughs.	No

Species	Listing Status ¹ Federal	Listing Status ¹ State	Habitat	Included in GPU EIR
Cooper's hawk <i>Accipiter cooperii</i>	—	—	Woodland, chiefly of open, interrupted, or marginal type. Nest sites mainly in riparian growths of deciduous trees, as in canyon bottoms on river floodplains; also, live oaks.	Yes
Double-crested cormorant <i>Nannopterum auritum</i>	—	—	Colonial nester on coastal cliffs, offshore islands, and along lake margins in the interior of the state. Nests along coast on sequestered islets, usually on ground with sloping surface, or in tall trees along lake margins.	Yes
Ferruginous hawk <i>Buteo regalis</i>	BCC	—	Open grasslands, sagebrush flats, desert scrub, low foothills and fringes of pinyon and juniper habitats. Eats mostly lagomorphs, ground squirrels, and mice. Population trends may follow lagomorph population cycles.	No
Golden eagle <i>Aquila chrysaetos</i>	BCC	FP	Rolling foothills, mountain areas, sage-juniper flats, and desert. Cliff-walled canyons provide nesting habitat in most parts of range; also, large trees in open areas.	No
Grasshopper sparrow <i>Ammodramus savannarum</i>	—	SSC	Dense grasslands on rolling hills, lowland plains, in valleys and on hillsides on lower mountain slopes. Favors native grasslands with a mix of grasses, forbs, and scattered shrubs. Loosely colonial when nesting.	No
Greater sandhill crane <i>Antigone canadensis tabida</i>	—	ST FP	Nests in wetland habitats in northeastern California; winters in the Central Valley. Prefers grain fields within 4 miles of a shallow body of water used as a communal roost site; irrigated pasture used as loafing sites.	Yes
Least Bell's vireo <i>Vireo bellii pusillus</i>	FE	SE	Summer resident of southern California in low riparian in vicinity of water or in dry river bottoms; below 2,000 feet. Nests placed along margins of bushes or on twigs projecting into pathways, usually willow, coyote brush, mesquite.	No
Lesser sandhill crane <i>Antigone canadensis canadensis</i>	—	SSC	Nests in wetland habitats in northeastern California; winters in the Central Valley. Uses pastures, moist grasslands, alfalfa fields, and shallow wetlands for loafing sites. Forages primarily in harvested grain fields.	No

Species	Listing Status ¹ Federal	Listing Status ¹ State	Habitat	Included in GPU EIR
Loggerhead shrike <i>Lanius ludovicianus</i>	BCC	SSC	Broken woodlands, savannah, pinyon-juniper, Joshua tree, and riparian woodlands, desert oases, scrub, and washes. Prefers open country for hunting, with perches for scanning, and dense shrubs and brush for nesting.	Yes
Long-billed curlew <i>Numenius americanus</i>	BCC	—	Great Basin grassland, meadow and seep. Breeds in upland shortgrass prairies and wet meadows in northeastern California. Habitats on gravelly soils and gently rolling terrain are favored over others.	Yes
Long-eared owl <i>Asio otus</i>	—	SSC	Riparian bottomlands grown to tall willows and cottonwoods; also, belts of live oak paralleling stream courses. Require adjacent open land productive of mice and the presence of old nests of crows, hawks, or magpies for breeding.	Yes
Merlin <i>Falco columbarius</i>	—	—	Estuary, Great Basin grassland, valley, and foothill grassland. Seacoast, tidal estuaries, open woodlands, savannahs, edges of grasslands and deserts, farms, and ranches. Clumps of trees or windbreaks are required for roosting in open country.	Yes
Northern harrier <i>Circus hudsonius</i>	—	SSC	Coastal salt and freshwater marsh. Nest and forage in grasslands, from salt grass in desert sink to mountain cienagas. Nests on ground in shrubby vegetation, usually at marsh edge; nest built of a large mound of sticks in wet areas.	Yes
Prairie falcon <i>Falco mexicanus</i>	BCC	—	Inhabits dry, open terrain, either level or hilly. Breeding sites are located on cliffs. Forages far afield, even to marshlands and ocean shores.	Yes
Purple martin <i>Progne subis</i>	—	SSC	Inhabits woodlands, low elevation coniferous forest of Douglas-fir, ponderosa pine, and Monterey pine. Nests in old woodpecker cavities mostly, also in human-made structures. Nest often located in tall, isolated tree/snag.	Yes

Species	Listing Status ¹ Federal	Listing Status ¹ State	Habitat	Included in GPU EIR
Saltmarsh common yellowthroat <i>Geothlypis trichas sinuosa</i>	BCC	SSC	Resident of the San Francisco Bay region, in fresh and saltwater marshes. Requires thick, continuous cover down to water surface for foraging; tall grasses, tule patches, willows for nesting.	No
Sharp-shinned hawk <i>Accipiter striatus</i>	—	—	Ponderosa pine, black oak, riparian deciduous, mixed conifer, and Jeffrey pine habitats. Prefers riparian areas. North-facing slopes, with plucking perches are critical requirements. Nests usually within 275 feet of water.	Yes
Short-eared owl <i>Asio flammeus</i>	—	SSC	Found in swamp lands, both fresh and saltwater; lowland meadows; irrigated alfalfa fields. Tule patches/tall grass needed for nesting/daytime seclusion. Nests on dry ground in depression concealed in vegetation.	Yes
Song sparrow ("Modesto" population) <i>Melospiza melodia</i> pop. 1	—	SSC	Central lower basin of Great Valley, from Colusa County south to Stanislaus County and east of Suisun Marshes. Breeds chiefly below 200 feet elevation. Freshwater marshes, riparian thickets, sparsely vegetated irrigation canals, and valley oak restoration sites. Cover consists of willow and nettle thickets, growths of tules and cattails, and riparian oak forests with sufficient understory of blackberry.	No
Suisun song sparrow <i>Melospiza melodia maxillaris</i>	BCC	SSC	Resident of brackish-water marshes surrounding Suisun Bay. Inhabits cattails, tules and other sedges, and pickleweed (<i>Salicornia</i> spp.); also known to frequent tangles bordering sloughs.	No
Swainson's hawk <i>Buteo swainsoni</i>	BCC	ST	Breeds in grasslands with scattered trees, juniper-sage flats, riparian areas, savannahs, and agricultural or ranch lands with groves or lines of trees. Requires adjacent suitable foraging areas such as grasslands, or alfalfa or grain fields supporting rodent populations.	Yes

Species	Listing Status ¹ Federal	Listing Status ¹ State	Habitat	Included in GPU EIR
Tricolored blackbird <i>Agelaius tricolor</i>	BCC	ST SSC	Highly colonial species, most numerous in Central Valley and vicinity. Largely endemic to California. Requires open water, protected nesting substrate, and foraging area with insect prey within a few kilometers of the colony.	Yes
Western snowy plover <i>Charadrius nivosus nivosus</i>	FT	SSC	Sandy beaches, salt pond levees and shores of large alkali lakes. Needs sandy, gravelly, or friable soils for nesting.	No
Western yellow-billed cuckoo <i>Coccyzus americanus occidentalis</i>	FT BCC	SE	Riparian forest nester along the broad, lower flood-bottoms of larger river systems. Nests in riparian jungles of willow, often mixed with cottonwoods, with lower story of blackberry, nettles, or wild grape.	Yes
White-faced ibis <i>Plegadis chihi</i>	—	—	Shallow fresh-water marsh. Dense tule thickets for nesting interspersed with areas of shallow water for foraging.	Yes
White-tailed kite <i>Elanus leucurus</i>	—	FP	Rolling foothills and valley margins with scattered oaks and river bottomlands or marshes next to deciduous woodland. Open grasslands, meadows, or marshes for foraging close to isolated, dense-topped trees for nesting and perching.	Yes
Yellow-breasted chat <i>Icteria virens</i>	—	SSC	Summer resident; inhabits riparian thickets of willow and other brushy tangles near watercourses. Nests in low, dense riparian, consisting of willow, blackberry, wild grape; forages and nests within 10 feet of ground.	Yes
Yellow-headed blackbird <i>Xanthocephalus xanthocephalus</i>	—	SSC	Nests in freshwater emergent wetlands with dense vegetation and deep water. Often along borders of lakes or ponds. Nests only where large insects such as Odonata are abundant, nesting timed with maximum emergence of aquatic insects.	No
Fish				
Chinook salmon - Central Valley fall / late fall-run ESU <i>Oncorhynchus tshawytscha</i> pop. 13	—	SSC	Sacramento/San Joaquin flowing waters. Populations spawning in the Sacramento and San Joaquin rivers and their tributaries.	Yes

Species	Listing Status ¹ Federal	Listing Status ¹ State	Habitat	Included in GPU EIR
Chinook salmon - Central Valley spring-run ESU <i>Oncorhynchus tshawytscha</i> pop. 11	FT	ST	Adult numbers depend on pool depth and volume, amount of cover, and proximity to gravel. Water temps greater than 27 C are lethal to adults. Federal listing refers to populations spawning in Sacramento River and tributaries.	Yes
Chinook salmon - Sacramento River winter-run ESU <i>Oncorhynchus tshawytscha</i> pop. 7	FE	SE	Sacramento/San Joaquin flowing waters. Sacramento River below Keswick Dam. Spawns in the Sacramento River, but not in tributary streams. Requires clean, cold water over gravel beds with water temperatures between 6 and 14 C for spawning.	Yes
Delta smelt <i>Hypomesus transpacificus</i>	FT	SE	Estuary. Sacramento-San Joaquin Delta. Seasonally in Suisun Bay, Carquinez Strait and San Pablo Bay. Seldom found at salinities greater than 10 ppt. Most often at salinities less than 2 ppt.	Yes
Green sturgeon <i>Acipenser medirostris</i>	FT	SSC	Klamath/North coast flowing waters, Sacramento/San Joaquin flowing waters. Green sturgeon is the most marine species of sturgeon. Abundance increases northward of Point Conception. Spawns in the Sacramento, Klamath, and Trinity rivers. Spawns at temperatures between 8-14 degrees C. Preferred spawning substrate is large cobble but can range from clean sand to bedrock.	Yes
Longfin smelt <i>Spirinchus thaleichthys</i>	FP	ST SSC	Found in open waters of estuaries, mostly in middle or bottom of water column. Prefer salinities of 15-30 ppt but can be found in completely freshwater to almost pure seawater.	Yes
Sacramento perch <i>Archoplites interruptus</i>	—	SSC	Historically found in the sloughs, slow-moving rivers, and lakes of the Central Valley. Prefers warm water. Aquatic vegetation is essential for young. Tolerates wide range of physio-chemical water conditions.	No

Species	Listing Status ¹ Federal	Listing Status ¹ State	Habitat	Included in GPU EIR
Sacramento splittail <i>Pogonichthys macrolepidotus</i>	—	SSC	Endemic to the lakes and rivers of the Central Valley, but now confined to the Delta, Suisun Bay and associated marshes. Slow moving river sections, dead end sloughs. Requires flooded vegetation for spawning and foraging for young.	Yes
Steelhead - Central Valley DPS <i>Oncorhynchus mykiss irideus</i> pop. 11	FT	—	Populations in the Sacramento and San Joaquin rivers and their tributaries.	Yes
Steelhead - Klamath Mountains Province DPS <i>Oncorhynchus mykiss irideus</i> pop. 1	—	SSC	Streams between Elk River, Oregon and the Klamath and Trinity Rivers in California, inclusive. Minimum water depth for upstream migration is 18 cm. Water velocities greater than 3-4 m/sec may impede upstream progress.	No
Western river lamprey <i>Lampetra ayresii</i>	—	SSC	Lower Sacramento River, San Joaquin River, and Russian River. May occur in coastal streams north of San Francisco Bay. Adults need clean, gravelly riffles, ammocoetes need sandy backwaters or stream edges, good water quality and temperatures less than 25 C	Yes
Invertebrates				
Crotch bumble bee <i>Bombus crotchii</i>	—	SC	Found primarily in California: Mediterranean, Pacific coast, western desert, Great Valley, and adjacent foothills through most of southwestern California. Habitat includes open grassland and scrub. Nests underground.	No
Delta green ground beetle <i>Elaphrus viridis</i>	FT	—	Restricted to the margins of vernal pools in the grassland area between Jepson Prairie and Travis Air Force Base. Prefers the sandy mud substrate where it slopes gently into the water, with low-growing vegetation, 25-100 percent cover.	Yes
Midvalley fairy shrimp <i>Branchinecta mesovallensis</i>	—	—	Vernal pools in the Central Valley.	Yes

Species	Listing Status ¹ Federal	Listing Status ¹ State	Habitat	Included in GPU EIR
Monarch <i>Danaus plexippus</i>	FC	—	Habitat requirements include host plants for larvae (primarily milkweeds [<i>Asclepias</i> spp.]); adult nectar sources (i.e., flowering plants); and sites for roosting, thermoregulation, mating, hibernation, and predator escape. Additionally, monarch butterfly requires conditions and resources for initiating and completing migration both to and from winter roosting areas. Winter roost sites extend along the coast from northern Mendocino to Baja California, Mexico. Roosts located in wind-protected tree groves (eucalyptus, Monterey pine, cypress), with nectar and water sources nearby.	No
Ricksecker's water scavenger beetle <i>Hydrochara rickseckeri</i>	—	—	Sacramento/San Joaquin flowing waters, and standing waters.	Yes
Valley elderberry longhorn beetle <i>Desmocerus californicus dimorphus</i>	FT	—	Riparian scrub. Occurs only in the Central Valley of California, in association with blue elderberry (<i>Sambucus mexicana</i>). Prefers to lay eggs in elderberries 2–8 inches in diameter; some preference shown for "stressed" elderberries.	Yes
Vernal pool fairy shrimp <i>Branchinecta lynchi</i>	FT	—	Endemic to the grasslands of the Central Valley, Central Coast mountains, and South Coast mountains, in astatic rain-filled pools. Inhabit small, clear-water sandstone-depression pools and grassed swale, earth slump, or basalt-flow depression pools.	Yes
Vernal pool tadpole shrimp <i>Lepidurus packardii</i>	FE	—	Inhabits vernal pools and swales in the Sacramento Valley containing clear to highly turbid water. Pools commonly found in grass bottomed swales of unplowed grasslands. Some pools are mud-bottomed and highly turbid.	Yes

Species	Listing Status ¹ Federal	Listing Status ¹ State	Habitat	Included in GPU EIR
Mammals				
American badger <i>Taxidea taxus</i>	—	SSC	American badgers are most commonly found in treeless areas including tallgrass and shortgrass prairies, grass-dominated meadows and fields within forested habitats, and shrub-steppe communities. Most abundant in drier open stages of most shrub, forest, and herbaceous habitats, with friable soils. Needs sufficient food, friable soils and open, uncultivated ground. Preys on burrowing rodents. Digs burrows.	Yes
Hoary bat <i>Lasiurus cinereus</i>	—	—	Prefers open habitats or habitat mosaics, with access to trees for cover and open areas or habitat edges for feeding. Roosts in dense foliage of medium to large trees. Feeds primarily on moths. Requires water.	No
Northern California ringtail <i>Bassariscus astutus raptor</i>	—	FP	Dens most often in rock crevices, boulder piles, or talus, but also tree hollows, root cavities, and rural buildings. Rarely use same den for more than a few days. Females with litters change dens within 10 days of birth and almost daily after 20 days.	Yes
Pallid bat <i>Antrozous pallidus</i>	—	SSC	Most common in open, dry habitats with rocky areas for roosting. Tree roosting has also been documented in large conifer snags, inside basal hollows of redwoods and giant sequoias, and bole cavities in oaks. Roosts must protect bats from high temperatures. Very sensitive to disturbance of roosting sites.	Yes
Riparian brush rabbit <i>Sylvilagus bachmani riparius</i>	FE	SE	Riparian areas on the San Joaquin River in northern Stanislaus County. Dense thickets of wild rose, willows, and blackberries.	No
Salt-marsh harvest mouse <i>Reithrodontomys raviventris</i>	FE	SE FP	Only in the saline emergent wetlands of San Francisco Bay and its tributaries. Pickleweed is primary habitat but may occur in other marsh vegetation types and in adjacent upland areas. Does not burrow, build loosely organized nests. Requires higher areas for flood escape.	No

Species	Listing Status ¹ Federal	Listing Status ¹ State	Habitat	Included in GPU EIR
Townsend's big-eared bat <i>Corynorhinus townsendii</i>	—	SSC	Throughout California in a wide variety of habitats. Most common in mesic sites. Requires large cavities for roosting, which may include abandoned buildings and mines, caves, and basal cavities of trees. Roosts in the open, hanging from walls and ceilings. Roosting sites limiting. Extremely sensitive to human disturbance.	No
Western red bat <i>Lasiurus frantzii</i>	—	SSC	Roosts primarily in trees, 2–40 feet above ground, from sea level up through mixed conifer forests. Prefers habitat edges and mosaics with trees that are protected from above and open below with open areas for foraging.	Yes
Yuma myotis <i>Myotis yumanensis</i>	—	—	Optimal habitats are open forests and woodlands with sources of water over which to feed. Distribution is closely tied to bodies of water. Maternity colonies in caves, mines, buildings or crevices.	Yes

Notes: CEQA = California Environmental Quality Act; CNDDB = California Natural Diversity Database; ESU = Evolutionarily Significant Unit

¹ Legal Status Definitions

Federal:

- FC Federal Candidate for listing (no formal protection)
- FE Federally Listed as Endangered (legally protected)
- FT Federally Listed as Threatened (legally protected)
- FD Federally Delisted
- FP Federally Proposed for listing
- BCC Bird of Conservation Concern

State:

- FP Fully protected (legally protected)
- SSC Species of special concern (no formal protection other than CEQA consideration)
- SE State Listed as Endangered (legally protected)
- ST State Listed as Threatened (legally protected)
- SC State Candidate for listing (legally protected)
- SD State Delisted

Sources: CNDDB 2024; USFWS 2024

6 ENERGY

6.1 INTRODUCTION

This chapter describes the existing conditions for energy in the unincorporated county and evaluates the potential effects that implementation of the CAP may have on energy. Specifically, this chapter evaluates the potential for the CAP to result in impacts related to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction and operation, and conflicts with State or local plan for renewable energy or energy efficiency. Because this analysis is subsequent to the adopted GPU EIR, the evaluation of impacts focuses on the potential for implementation of the CAP to result in new or substantially more severe impacts than presented in the GPU EIR, given changes in environmental and regulatory conditions that have occurred since the certification of the GPU EIR. No scoping comments pertaining to energy were received during the notice of preparation (NOP). The NOP and comments received in response to the NOP are provided in Appendix A of this SEIR.

6.2 ENVIRONMENTAL SETTING

The environmental setting pertaining to energy services described in GPU EIR Chapter 4, “Public Services” (page 4-7), remains applicable to this analysis and is incorporated by reference. The following discussion summarizes the information in the GPU EIR and includes supplemental existing conditions information to capture updates since the adoption of the GPU EIR or add information that was not included in the GPU EIR.

6.2.1 ENERGY FACILITIES AND SERVICES

ENERGY TYPES AND SOURCES

Electricity is supplied in the county by the Sacramento Municipal Utility District (SMUD) and natural gas is provided by Pacific Gas and Electric Company (PG&E). Since the writing of the GPU EIR, more recent data regarding State energy types and sources has been made available. California relies on a regional power system composed of a diverse mix of natural gas, renewable, hydroelectric, and nuclear generation resources. One-third of the energy commodities consumed in California is natural gas. In 2022, total utility-scale electric generation for California was 287,220 gigawatt-hours, up 3.4 percent (9,456 GWh) from 2021. Renewable and non-GHG (nuclear and large hydroelectric) resources accounted for 54.2 percent of total generation, compared to 52.1 percent in 2021. Lastly, natural gas accounted for 36.4 percent of California’s total power mix (CEC 2024a). In 2022, SMUD provided its customers with 23 percent eligible renewable energy (i.e., biomass combustion, geothermal, small scale hydroelectric, solar, and wind) and 25 percent and 45 percent from large-scale hydroelectric and natural gas, respectively (SMUD 2024). The contribution of in- and out-of-State power plants depends on the precipitation that occurred in the previous year, the corresponding amount of hydroelectric power that is available, and other factors.

ALTERNATIVE FUELS

A variety of alternative fuels (e.g., renewable natural gas, electricity, hydrogen, and renewable diesel) are used to reduce demand for petroleum-based fuel. The use of these fuels is encouraged through various Statewide regulations and plans (e.g., Low Carbon Fuel Standard, Assembly Bill [AB] 32 Scoping Plan and subsequent updates).

California has a growing number of alternative fuel vehicles through the joint efforts of the California Energy Commission (CEC), California Air Resources Board (CARB), local air districts, federal government agencies, transit agencies, utilities, and other public and private entities. As of June 2024, California contained over 17,000 alternative fueling stations (AFDC 2024).

ENERGY USE FOR TRANSPORTATION

Since the writing of the GPU EIR, more recent data regarding state and County energy use relating to transportation has been made available. In 2022, the transportation sector comprised the largest end-use sector of energy in California totaling 42.6 percent, followed by the industrial sector totaling 22.5 percent, the residential sector at 17.6 percent, and the commercial sector at 17.4 percent (EIA 2024). On-road vehicles use about 90 percent of the petroleum consumed in California. CEC reported retail sales of 448 million and 45 million gallons of gasoline and diesel, respectively, in Sacramento County in 2021 (the most recent data available) (CEC 2024b). Additionally, statewide ZEV usage has dramatically increased since the adoption of the GPU EIR. The total number of light-duty ZEVs in the state in 2023 was 1,516,107. In 2010, when the GPU EIR was adopted, the total number of light-duty ZEVs was 768 (CEC 2024c).

ENERGY USE AND CLIMATE CHANGE

Scientists and climatologists have produced evidence that the burning of fossil fuels by vehicles, power plants, industrial facilities, residences, and commercial facilities has led to an increase of the earth's temperature. For an analysis of greenhouse gas (GHG) production and the CAP's impacts on climate change, see Chapter 7, "Climate Change."

6.3 REGULATORY SETTING

The regulatory setting pertaining to energy services on page 4-9 of the GPU EIR is incorporated by reference. Applicable federal, State, and local regulations that have seen changes or updates since the adoption of the GPU EIR or those that were not included in the GPU EIR are described below.

6.3.1 FEDERAL

CORPORATE AVERAGE FUEL ECONOMY STANDARD

In October 2012, the U.S. Environmental Protection Agency (EPA) and the National Highway Traffic Safety Administration (NHTSA), on behalf of the U.S. Department of Transportation (DOT), issued final rules to further reduce GHG emissions and improve

Corporate Average Fuel Economy (CAFE) standards for light-duty vehicles for model year (MYs) 2017 and beyond (77 Federal Register [FR] 62624). The most recent CAFE standards are for MYs 2024–2026. The amended CAFE standards increase in stringency for both passenger cars and light trucks, by 8 percent per year for MYs 2024–2025 and by 10 percent per year for MY 2026. NHTSA currently projects that the standards will require, on an average industry fleet-wide basis, roughly 49 miles per gallon (mpg) for MY 2026 (49 CFR 531 et seq.).

ENERGY INDEPENDENCE AND SECURITY ACT

The Energy Independence and Security Act of 2007 is designed to improve vehicle fuel economy and help reduce US dependence on oil. It represents a major step forward in expanding the production of renewable fuels, reducing dependence on oil, and confronting global climate change. The act increased the supply of alternative fuel sources by setting a mandatory Renewable Fuel Standard, which required fuel producers to use at least 36 billion gallons of biofuel in 2022 and reduced US demand for oil by setting a national fuel economy standard of 35 mpg by 2020.

6.3.2 STATE

ASSEMBLY BILL 2076: REDUCING DEPENDENCE ON PETROLEUM

Pursuant to AB 2076 (Chapter 936, Statutes of 2000), CEC and CARB prepared and adopted a joint agency report in 2003, *Reducing California's Petroleum Dependence*. Included in this report are recommendations to increase the use of alternative fuels to 20 percent of on-road transportation fuel use by 2020 and 30 percent by 2030, significantly increase the efficiency of motor vehicles, and reduce per capita VMT (CEC and CARB 2003). Further, in response to CEC's 2003 and 2005 Integrated Energy Policy Reports (IEPRs), the governor directed CEC to take the lead in developing a long-term plan to increase alternative fuel use.

A performance-based goal of AB 2076 was to reduce petroleum demand to 15 percent below 2003 demand by 2020.

INTEGRATED ENERGY POLICY REPORT

Senate Bill (SB) 1389 (Chapter 568, Statutes of 2002) required CEC to “conduct assessments and forecasts of all aspects of energy industry supply, production, transportation, delivery and distribution, demand, and prices. The Energy Commission shall use these assessments and forecasts to develop energy policies that conserve resources, protect the environment, ensure energy reliability, enhance the state’s economy, and protect public health and safety” (PRC Section 25301[a]). This work culminated in preparation of the first IEPR.

CEC adopts an IEPR every two years and an update every other year. The 2023 IEPR, which is the most recent IEPR, was adopted February 2024. The 2023 IEPR provides a summary of priority energy issues currently facing California, outlining strategies and recommendations to further the State’s goal of ensuring reliable, affordable, and environmentally responsible energy sources. Energy topics covered in the report include

progress toward statewide renewable energy targets and issues facing future renewable development; efforts to increase energy efficiency in existing and new buildings; progress by utilities in achieving energy efficiency targets and potential; improving coordination among the State's energy agencies; streamlining power plant licensing processes; results of preliminary forecasts of electricity, natural gas, and transportation fuel supply and demand; future energy infrastructure needs; the need for research and development efforts to statewide energy policies; and issues facing California's nuclear power plants (CEC 2024c).

CALIFORNIA RENEWABLES PORTFOLIO STANDARD

SB X1-2 of 2011 requires all California utilities to generate 33 percent of their electricity from renewables by 2020. SB 100 of 2018 sets a three-stage compliance period requiring all California utilities, including independently owned utilities, energy service providers, and community choice aggregators, to generate 52 percent of their electricity from renewables by December 31, 2027; 60 percent by December 31, 2030; and 100 percent carbon-free electricity by December 31, 2045. On September 16, 2022, SB 1020 was signed into law. This bill supersedes the goals of SB 100 by requiring that eligible renewable energy resources and zero-carbon resources supply 90 percent of all retail sales of electricity to California end-use customers by December 31, 2035, 95 percent of all retail sales of electricity to California end-use customers by December 31, 2040, 100 percent of all retail sales of electricity to California end-use customers by December 31, 2045, and 100 percent of electricity procured to serve all State agencies by December 31, 2035.

SENATE BILL 350: CLEAN ENERGY AND POLLUTION REDUCTION ACT OF 2015

The Clean Energy and Pollution Reduction Act of 2015 (SB 350) requires doubling of the energy efficiency savings in electricity and natural gas for retail customers through energy efficiency and conservation by December 31, 2030.

ASSEMBLY BILL 1007: STATE ALTERNATIVE FUELS PLAN

AB 1007 (Chapter 371, Statutes of 2005) required CEC to prepare a State plan to increase the use of alternative fuels in California. CEC prepared the State Alternative Fuels Plan in partnership with CARB and in consultation with other State, federal, and local agencies. The plan presents strategies and actions California must take to increase the use of nonpetroleum fuels in a manner that minimizes the costs to California and maximizes the economic benefits of in-state production. The plan assessed various alternative fuels and developed fuel portfolios to meet California's goals to reduce petroleum consumption, increase alternative fuel use, reduce GHG emissions, and increase in-state production of biofuels without causing a significant degradation to public health and environmental quality.

CLIMATE CHANGE SCOPING PLAN

As stated above, California Legislature enacted AB 1279, which codified stringent emissions targets for the state of achieving carbon neutrality and an 85 percent reduction in 1990 emissions level by 2045. CARB released the *Final 2022 Scoping Plan for Achieving Carbon Neutrality* (2022 Scoping Plan) on November 16, 2022, as also directed by AB 1279 (CARB 2022). The 2022 Scoping Plan traces the pathway for the

State to achieve its carbon neutrality and an 85 percent reduction in 1990 emissions goal by 2045. CARB adopted the 2022 Scoping Plan on December 16, 2022.

CALIFORNIA ENERGY EFFICIENCY ACTION PLAN

The 2019 California Energy Efficiency Action Plan has three primary goals for the State: double energy efficiency savings by 2030 relative to a 2015 base year (per SB 350), expand energy efficiency in low-income and disadvantaged communities, and reduce GHG emissions from buildings. This plan provides guiding principles and recommendations related to how the State would achieve those goals. These recommendations include the following (CEC 2019):

- Identify funding sources that support energy efficiency programs.
- Identify opportunities to improve energy efficiency through data analysis.
- Use program designs to encourage increased energy efficiency on the consumer end.
- Improve energy efficiency through workforce education and training.
- Support rulemaking and programs that incorporate energy demand flexibility and building decarbonization.

CALIFORNIA CODE OF REGULATIONS

The California Code of Regulations (specifically, the California Building Energy Efficiency Standards (Title 24, Part 6) and the California Green Building Standards (Title 24, Part 11) were included in the regulatory setting discussion of the GPU EIR. However, as Title 24, Part 6 and Title 24, Part 11 are updated every 3 years, the standards and regulations in each have been updated since the writing of the GPU EIR. Therefore, updates to Title 24, Part 6 and Title 24, Part 11 are discussed below.

CALIFORNIA BUILDING ENERGY EFFICIENCY STANDARDS (TITLE 24, PART 6)

The energy consumption of new residential and nonresidential buildings in California is regulated by the California Energy Code. The code was established by CEC in 1978 in response to a legislative mandate to create uniform building codes to reduce California's energy consumption and provide energy-efficiency standards for residential and nonresidential buildings. CEC updates the California Energy Code every 3 years, typically including more stringent design requirements for reduced energy consumption, which results in the generation of fewer GHG emissions.

The 2022 California Energy Code went into effect on January 1, 2023. The 2022 California Energy Code advances the on-site energy generation progress started in the 2019 California Energy Code by encouraging electric heat pump technology and use, establishing electric-ready requirements when natural gas is installed, expanding solar photovoltaic (PV) system and battery storage standards, and strengthening ventilation standards to improve indoor air quality.

CALIFORNIA GREEN BUILDING STANDARDS (TITLE 24, PART 11)

The California Green Building Standards Code, also known as the CALGreen Code, is a reach code (i.e., optional standards that exceed the requirements of mandatory codes) developed by CEC that provides green building standards for Statewide residential and nonresidential construction. The current version is the 2022 CALGreen Code, which took effect on January 1, 2023. As compared to the 2019 CALGreen Code, the 2022 CALGreen Code strengthened sections pertaining to electric vehicle (EV) and bicycle parking, water efficiency and conservation, and material conservation and resource efficiency, among other sections of the CALGreen Code. The CALGreen Code sets design requirements equivalent to or more stringent than those of the California Energy Code for energy efficiency, water efficiency, waste diversion, and indoor air quality. These codes are adopted by local agencies that enforce building codes and used as guidelines by State agencies for meeting the requirements of Executive Order B-18-12.

LEGISLATION ASSOCIATED WITH GREENHOUSE GAS REDUCTION

For details about legislation associated with GHG reduction, which have co-benefits related to reduced energy demand and increased energy efficiency, see the regulatory setting of Chapter 7, “Climate Change.”

6.3.3 LOCAL

SACRAMENTO COUNTY GENERAL PLAN

The Sacramento County General Plan includes the following energy-related policies in the Energy Element that are relevant to the CAP:

- EN-3.** Encourage the conservation and rehabilitation of existing housing and the revitalization of older, more intensively developed neighborhoods in the urban area.
- EN-5.** Reduce travel distances and reliance on the automobile and facilitate increased use of public transit through appropriate land use plans and regulations.

6.4 SIGNIFICANCE CRITERIA AND METHODOLOGY

6.4.1 SIGNIFICANCE CRITERIA

Thresholds of significance are based on Appendix G of the CEQA Guidelines. The project would result in an impact on energy resources if it would:

- result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy, or wasteful use of energy resources, during construction or operation; or
- conflict with or obstruct a State or local plan for renewable energy or energy efficiency.

6.4.2 METHODOLOGY

The CAP is a policy document and does not propose any specific future projects. As described in Chapter 1, “Introduction,” this SEIR considers the broad environmental implications of implementing the CAP on a conceptual basis and does not provide a project-level assessment. Impacts related to energy were analyzed qualitatively based on a review of the CAP measures and actions and their potential to result in physical changes to the environment if the CAP is approved and implemented. Each issue area was analyzed in the context of existing laws and regulations, as well as policies adopted in the General Plan, and the extent to which these existing regulations and policies adequately address and minimize the potential for impacts associated with implementation of the CAP. The impact analysis also focuses on whether approval and implementation of the CAP would result in new or more severe energy resources impacts than what would occur with implementation of the General Plan. As described in further detail below, the GPU EIR did not analyze energy impacts, but for the analysis of impacts related to the construction of new energy production and/or transmission facilities or expansion of existing facilities. This threshold is not addressed in this section, as potential impacts related to the construction of new renewable energy infrastructure, as proposed by the CAP, are analyzed in other sections of this SEIR. The energy-related Appendix G checklist questions were added in 2018, subsequent to the certification of the GPU EIR, and are addressed herein.

6.5 IMPACT AND ANALYSIS

6.5.1 IMPACT EN-1: RESULT IN WASTEFUL, INEFFICIENT, OR UNNECESSARY CONSUMPTION OF ENERGY, DURING PROJECT CONSTRUCTION OR OPERATION

GENERAL PLAN UPDATE EIR DETERMINATION

In 2018, Appendix G of the CEQA Guidelines was updated to include a separate section with new questions associated with evaluating a project’s potential impacts related to energy. The GPU EIR was certified prior to the 2018 update and, therefore, did not include a separate section for energy.

Chapter 12, “Climate Change,” of the GPU EIR evaluated the role of energy use and production in local initiatives to address climate change. The analysis considered the inclusion of proposed CAP policies to increase energy efficiency and use of renewable energy sources, and the effects of expanded renewable energy generation on land use and natural resources. Mitigation was adopted for this impact, with one energy-specific measure described in Mitigation Measure CC-2(c), calling for an update to the Energy Element of the General Plan to include policies for siting alternative energy production, such as solar and wind farms. Mitigation Measure CC-2(c) was adopted to reduce climate change impacts from GHG emissions from energy production. Mitigation Measure CC-2(c) was incorporated into the Land Use Element of the General Plan as

Implementation Measure J. Policies that relate to siting and design of renewable energy facilities are now found in the Public Facilities Element of the General Plan in the section entitled “Solar Electric and other Renewable Energy Facilities.”

Impacts related to the construction of new or expanded energy production and/or transmission facilities are discussed in Chapter 4, “Public Services,” of the GPU EIR (page 4-28). Among the topics that were added to the CEQA Guidelines in 2018 and, therefore, not addressed in the GPU EIR is a project’s potential to result in an impact due to the wasteful, inefficient, or unnecessary consumption of energy resources. The GPU EIR does not include an impact evaluation that specifically addresses this topic. However, this issue was known and could have been evaluated at that time.

PROPOSED CLIMATE ACTION PLAN IMPACT ANALYSIS

The CAP is a policy-level document that does not include any site-specific designs or proposals or grant any entitlements for development; however, construction and operation of facilities identified in GHG reduction measures and adaptation strategies that would be implemented with CAP adoption would result in the consumption of energy resources.

CONSTRUCTION

CAP goals and actions that could result in the construction of new EV charging stations (Measure GHG-07), minor bicycle and pedestrian infrastructure (e.g., bike lanes, bike parking, pedestrian paths) (Measures GHG-11, GHG-12, and GOV-01), new on-site renewable energy systems (Measures GHG-03 and GHG-05), minor residential and commercial retrofits (Measure GHG-04), and tree and vegetation planting (Measure GHG-02) would result in the consumption of energy resources during construction. These measures would increase electricity demand, consumption of fuels, and use of non-renewable resources during construction through the utilization of fuels for activities such as construction crew commutes, operation of construction equipment, and material delivery. These types of projects would not involve large amounts of labor or extensive use of construction equipment. Some worker trips may be required during installation of these facilities and features, resulting in the short-term consumption of diesel fuel and gasoline. However, given that County-initiated work would be publicly-funded and therefore subject to competitive bid, it is likely that cost savings would occur through using a local workforce that would not require extended commutes to reach construction sites. Construction equipment (e.g., backhoes, front loaders, pavers bulldozers, and skid steers) may also be used during installation of these facilities and features, but it is likely that this equipment would be used intermittently and for relatively short periods of time and, to reduce costs, would be used as minimally as feasible. Additionally, Measure GHG-16 would promote the use of alternative fuels and the electrification of construction equipment and would therefore reduce fossil fuel consumption. Demand for energy resources during construction would vary throughout the construction period and would generally cease upon completion of construction.

OPERATION

The measures listed above may result in occasional operational maintenance activities (e.g., maintenance vehicle use, equipment replacement, tree watering and trimming, vegetation management). These maintenance activities for facilities would be minimal or accomplished with existing personnel and in conjunction with established maintenance activities; thus, associated energy consumption would also be minimal or would not substantially increase. Some energy consumption could occur from the treatment and transportation of water used to irrigate the new trees. Maintenance trips would likely be infrequent and would only involve relatively few crew members and pieces of equipment. Because operational vehicle trips would be minimal, associated operational fuel consumption would also be minimal.

Demand for energy facilities and services leading to environmental impacts would be less under the proposed CAP due to the introduction of a series of additional energy-saving measures that promote enhanced energy conservation from projects that are constructed and operated within the county. For example, Measure GHG-04 includes actions intended to increase energy efficiency and electrify existing buildings at the time of renovation. This measure includes Action GHG-04-k, which would involve reviewing the existing permitting processes for residential building owners seeking to replace natural gas-fired equipment and modifying as needed to reduce complexity, cost, and processing time for any required permits, such as requiring only electrical inspection instead of both plumbing and electrical. Additionally, Measure GHG-05 would require all new construction projects to achieve specific performance standards to maximize energy efficiency and decarbonization. This would be achieved through actions such as Action GHG-05-a, which would require working with the California Energy Codes and Standards Program to develop cost-effective reach codes that must be met by all new construction. The reach codes would require that residential projects meet or exceed a modeled EDR1 (Energy Design Rating) metric of 11.5 points above the Title 24, Part 6 statewide performance minimum (the “standard design building”), and that nonresidential projects reduce emissions by 19 percent by 2030, and by 75 percent by 2045. Action GHG-05-b would provide fee reductions or offsets and expedited permitting for residential and nonresidential projects that are built all-electric and do not include new natural gas infrastructure. These measures and actions are intended to achieve increased energy efficiency and higher efficiency all-electric building design within existing and new buildings throughout the county. Regarding County operations, Measure GOV-04 would involve adopting an Electric Building Policy that requires all newly constructed County buildings to include no natural gas infrastructure as well as developing a County Buildings and Facilities Decarbonization Plan by 2028. Overall, these measures and actions would reduce the wasteful consumption of energy in buildings.

The CAP includes measures such as Measures GHG-07, GHG-09, GHG-11, and GHG-12, which would reduce countywide transportation-related energy consumption by reducing VMT, supporting the transition to EVs, and increasing overall efficiency in the transportation sector by encouraging the use of alternative transportation such as public transit, walking, and biking. Measure GHG-07 would plan for and deploy increased zero-emission vehicle infrastructure such as EV facilities. This measure includes actions such as Action GHG-07-a, which would involve developing and adopting an ordinance

that amends the CALGreen Code to require EV charging capability in new residential and non-residential developments compliant with CALGreen Tier 2 EV charging requirements, as well as Action GHG-07-d, which involves developing a "Sacramento County Zero-Emission Vehicle Infrastructure Deployment Strategy" to prepare Sacramento County for the widespread adoption of EVs, installing public EV chargers in the county, and providing hydrogen-fueling and other renewable fuel options, using the Electric Vehicle Readiness and Infrastructure Plan as a foundation. By supporting the transition to EVs, these measures and actions would increase transportation efficiency by reducing the consumption of fossil fuels used for transportation. Additionally, Measure GHG-09 would update the requirements for Transportation System Management (TSM) Plans to include a target of 15 percent reduction in annual VMT below the regional average from all qualified projects through 2045. This would be achieved through actions such as Action GHG-09-a, which would involve adopting an ordinance to update Section 5.9.6 of the Zoning Code to update the TSM Plan requirements so that new development would be required to establish a target of 15 percent reduction in annual VMT below the regional average, with a requirement for annual reporting of employee's commute trips and VMT reduction target alignment, and a requirement to join the 50 Corridor Transportation Management Association (TMA) and Sacramento TMA.

Measures GHG-11 and GHG-12 would increase public transit ridership and improve active transportation infrastructure through implementation of priority projects identified in the County's 2022 Active Transportation Plan. Measure GHG-11 includes actions such as Action GHG-11-b, which would involve updating the traffic impact analysis (TIA) guidelines to require projects near transit to prioritize measures to improve and support transit access. Measure GHG-12 includes actions such as Action GHG-12-e, which would require the inclusion of active transportation projects in the transportation Capital Improvement Plan as project funding is secured. Collectively, the measures and actions listed above, as well as similar measures and actions included in the CAP, would reduce countywide fossil fuel consumption by reducing county-wide VMT and improving access to alternative modes of transportation. Overall, this would reduce the wasteful consumption of fossil fuels.

Measure GHG-14 would reduce the inefficient use of resources in the waste sector by increasing diversion of organic waste from landfills for both commercial and residential sources to 75 percent by 2030 and through 2045, up from 2015 rates of 56 and 52 percent respectively. Action GHG-14-b would amend the Zoning Code to clarify and streamline the permitting process for construction and operation of composting facilities within the unincorporated county, while Action GHG-14-c would continue to implement and enforce organics diversion ordinances associated with SB 1383 by working with the County's franchised commercial haulers to ensure all customers are subscribed to the appropriate level of service and that audits are completed and enforced on the appropriate schedule. Measure GHG-14 and its associated actions would increase the reuse of materials to reduce the consumption of nonrenewable resources.

SUMMARY

The goal of the CAP is to reduce GHG emissions generated within the county by increasing the use of alternatively fueled vehicles, reducing VMT, increasing energy and water efficiency, generating and utilizing renewable energy, and reducing waste generation. Although implementation of the CAP would result in temporary construction activities that would consume energy resources, Measure GHG-16 would promote the use of alternative fuel in construction equipment and would therefore reduce fossil fuel consumption.

Moreover, while the GHG reduction measures were formulated to reduce operational GHGs, many would also improve energy efficiency (e.g., Measure GHG-04), reduce energy demand (e.g., GOV-04), and decrease transportation-related fossil fuel consumption (e.g., Measure GHG-09). Thus, implementation of the CAP would not result in wasteful, inefficient, or unnecessary consumption of energy during project construction. Further, measures that encourage improvements to alternative transportation infrastructure (e.g., Measures GHG-11 and GHG-12), require energy efficiency and water conservation (e.g., Measures GOV-04, GHG-04, and GHG-05) and enhance waste processing (Measure GHG-14) would result in long-term reduction in energy consumption and a reduction in the use of nonrenewable energy sources. While construction of the measures above would require the consumption of energy, the CAP is intended to reduce county-wide GHGs, largely by improving energy efficiency and conservation. Therefore, construction-related energy usage would be offset by the energy savings that would result from implementation of the CAP.

As discussed previously, impacts related to energy were not analyzed in the GPU EIR. Because of this, it is not possible to directly compare these analyses. However, it is determined, based on the analysis above, that because the GHG reduction measures proposed within the CAP would result in the use of more efficient technology that would generally reduce energy demand and improving energy efficiency, the impacts would be less than those that would occur due to implementation of the General Plan without the proposed CAP. This impact would be **less than significant**.

MITIGATION MEASURES

No mitigation is required.

6.5.2 IMPACT EN-2: OBSTRUCT A STATE OR LOCAL PLAN FOR RENEWABLE ENERGY OR ENERGY EFFICIENCY

GENERAL PLAN UPDATE EIR DETERMINATION

As discussed above, because Appendix G of the CEQA Guidelines was updated in 2018, after to certification of the GPU EIR, the GPU EIR does not include an impact evaluation related to a project's potential to obstruct a State or local plan for renewable energy or energy efficiency.

PROPOSED CLIMATE ACTION PLAN IMPACT ANALYSIS

Relevant plans that pertain to the efficient use of energy include the Energy Efficiency Action Plan, which focuses on energy efficiency and building decarbonization (CEC 2019), as well as the 2022 Scoping Plan.

The Energy Efficiency Action Plan aims to drive energy efficiency: doubling energy efficiency savings by 2030, removing and reducing barriers to energy efficiency in low-income and disadvantaged communities, and reducing GHG emissions from the buildings sector. The 2022 Scoping Plan focuses on achieving carbon neutrality and reduced GHG emissions by 85 percent below 1990 levels by no later than 2045 through deployment of clean technologies and fuels, further reductions in short-lived climate pollutants, support for sustainable development, increased action on natural and working lands to reduce emissions and sequester carbon, and the capture and storage of carbon. Notably, the CAP and associated GHG reduction measures were specifically developed to meet the 2022 Scoping Plan's GHG reduction goal. Therefore, the GHG reduction measures and their associated actions were designed to align with the energy efficiency goals of the 2022 Scoping Plan.

As discussed in Impact EN-1, although future development associated with the CAP has the potential to result in the consumption of energy during construction and operation, the CAP is intended to reduce GHG emissions largely through measures and actions which pertain to energy efficiency and conservation. Regarding construction-related energy, the CAP includes Measure GHG-16, which features actions such as Action GHG-16-a and GHG-16-d which would incorporate the use of zero-emission construction and portable equipment in the County's bid evaluation process for capital improvement projects, providing preference to contractors that use electric-powered equipment, and develop and adopt an ordinance requiring that all discretionary projects use electric-powered or zero-emission construction equipment starting in 2035, respectively. This would reduce construction-related energy consumption by utilizing a greater number of alternatively fueled construction equipment such as equipment powered by electricity, biodiesel, or hydrogen cells. Regarding operations, energy-efficiency-related measures such as Measure GHG-03 (support SMUD in the implementation of the 2030 Zero Carbon Plan), Measure GHG-04 (increase energy efficiency and electrify existing buildings at time-of-renovation), Measure GHG-05 (require all new residential and non-residential construction to incorporate solar PV, electric heat, ventilation, and cooling systems, and electric water heating end uses), and Measure GOV-04 (develop a County Buildings and Facilities Decarbonization Plan by 2028 and electrify County buildings) and actions that involve increasing the utilization of renewables (e.g., Actions GHG-05-a, GHG-03-a), facilitating further transition to all-electric development (e.g., Actions GHG-04-a, GHG-04-h, and GHG-04-l) would increase energy efficiency and reduce fossil fuel consumption related to energy generation. Increasing energy efficiency and reducing fossil fuel consumption related to energy generation are two of the primary goals of the Energy Efficiency Action Plan. These measures and actions, as well as similar measures and actions proposed under the CAP, would also align with the GHG reduction and energy efficiency goals of the

2022 Scoping Plan by deploying clean technologies and supporting sustainable development.

Further, CAP measures that would result in new facilities such as new EV charging stations (e.g., Measures GHG-07, GOV-01, and GOV-02), reduce single-occupancy vehicle trips by encouraging alternative transportation such as public transit, biking, and walking (e.g., Measures GHG-11 and GOV-01,) adding additional minor bicycle and pedestrian infrastructure (e.g., bike lanes, bike parking, pedestrian paths), as well as updating existing facilities (e.g., Measures GHG-11 and GHG-12), are consistent with the goal of the 2022 Scoping Plan to reduce VMT and improve the efficiency of the transportation sector, thus reducing fossil fuel consumption.

As discussed previously, impacts related to energy were not directly analyzed in the GPU EIR. However, it is determined, based on the analysis above, that because the GHG reduction measures proposed within the CAP would require newer and more efficient technology to reduce GHG emissions, the impacts related to energy resources would be less than those that would occur due to implementation of the General Plan without the CAP. Additionally, as stated above, the GHG reduction measures and their associated actions were designed to align with the energy efficiency goals of the 2022 Scoping Plan. Therefore, the CAP would not result in a new impact related to conflicts with or obstruction of a State or local plan for renewable energy or energy efficiency. This impact would be **less than significant**.

MITIGATION MEASURES

No mitigation is required.

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7 GREENHOUSE GASES AND CLIMATE CHANGE

7.1 INTRODUCTION

This chapter discusses existing conditions related to greenhouse gas (GHG) emissions, summarizes regulations applicable to GHG emissions, summarizes climate change science and GHG emissions sources in California, and discusses Sacramento County's contribution to global climate change. Because this analysis is supplemental to the certified GPU EIR, the evaluation of impacts focuses on the potential for implementation of the CAP to result in new or substantially more severe impacts than presented in the GPU EIR. This chapter incorporates by reference the GHG setting and impact analysis from the GPU EIR as it applies to the CAP and supplements the analysis with relevant setting conditions that have changed since certification of the GPU EIR.

Scoping comments were received pertaining to climate change. These comments are provided in Appendix A. Many of these comments suggest that there are new or greater impacts associated with the adopted General Plan than disclosed in the GPU EIR because of new regulations and changes in anticipated growth patterns.

As described throughout this SEIR, the CAP has been prepared in light of the current regulatory environment based on updated growth projections. The evaluation of impacts in this chapter considers the potential for the CAP to result in new or more severe impacts than the General Plan but does not reconsider the evaluation of the General Plan in the certified GPU EIR. The General Plan, as covered in the GPU EIR, is an adopted plan, and the CAP does not alter the growth potential or adopted land uses in the General Plan.

Other comments questioned the forecasting methodology used in the CAP and suggested considering specific GHG emission reduction measures. See Chapter 2, "Project Description," for a discussion of the GHG emissions forecasts and reduction measures included in the CAP.

7.2 ENVIRONMENTAL SETTING

The environmental setting described in Chapter 12, "Climate Change" (pages 12-3 through 12-4), of the GPU EIR remains applicable to the analysis and is incorporated by reference. The following discussion summarizes the information in the GPU EIR and includes supplemental information about existing conditions to capture updates since adoption of the GPU EIR or add information that was not included in the GPU EIR.

7.2.1 THE PHYSICAL SCIENTIFIC BASIS OF GREENHOUSE GAS EMISSIONS AND CLIMATE CHANGE

Since the writing of the GPU EIR, further studies have been conducted regarding the physical scientific basis of climate change. According to the Intergovernmental Panel on Climate Change's (IPCC's) *Climate Change 2014 Synthesis Report*, it is “extremely likely” that more than half of the observed increase in global average surface temperature from 1951 to 2010 was caused by the anthropogenic (i.e., originating from human activity) increase in GHG concentrations and other anthropogenic forcing (IPCC 2014). Further, of the total annual human-caused carbon dioxide (CO₂) emissions, approximately 55 percent are estimated to be sequestered through ocean and land uptake every year, averaged over the last 50 years, whereas the remaining 45 percent of human-caused CO₂ emissions remain stored in the atmosphere (IPCC 2013).

The quantity of GHGs in the atmosphere responsible for climate change is not precisely known, but it is considered to be enormous. No single project alone would measurably contribute to an incremental change in the global average temperature or to global or local climates or microclimates. From the standpoint of CEQA, GHG impacts relative to global climate change are inherently cumulative.

GREENHOUSE GAS EMISSIONS SOURCES AND SINKS

Since the writing of the GPU EIR, statewide and County-wide GHG emissions associated with each sector have changed. The total GHG inventory for California in 2021 was approximately 381 million metric tons of CO₂ equivalent (MMTCO_{2e}) (CARB 2023a).¹

A GHG inventory for Sacramento County was completed for inventory year 2021, as summarized in Table 7-1.

Table 7-1: Sacramento County Community Greenhouse Gas Emissions by Sector (2021)

Sector	Emissions (MTCO _{2e})	Percent
On-Road Vehicles	1,844,200	44.3
Off-Road Vehicles	107,200	2.6
Residential Building Energy	878,300	21.1
Commercial/Industrial Building Energy	555,600	13.4
High-GWP Gases	317,800	7.6
Agriculture	266,500	6.4
Solid Waste	156,700	3.8
Water/Wastewater	33,300	0.8
Total	4,159,600	100

Notes: GWP = global warming potential; MTCO_{2e} = metric tons of carbon dioxide equivalent.

Source: Sacramento County 2024.

¹ CO₂ equivalent is the number of metric tons of CO₂ emissions with the same global warming potential as one metric ton of another GHG.

As shown in Table 7-1, on-road vehicles and residential building energy are the two largest GHG-emitting sectors in Sacramento County.

EFFECTS OF CLIMATE CHANGE ON THE ENVIRONMENT

According to the IPCC, global average temperature will increase by 3.7 to 4.8 degrees Celsius (°C) (6.7 to 8.6 degrees Fahrenheit [°F]) by the end of the century unless additional efforts to reduce GHG emissions are made (IPCC 2014: 10). According to *California's Fourth Climate Change Assessment*, if global GHG emissions are reduced at a moderate rate, California will experience average daily high temperatures that are warmer than the historic average by 2.5°F from 2006 to 2039, by 4.4°F from 2040 to 2069, and by 5.6°F from 2070 to 2100. However, if GHG emissions continue at current rates, California will experience average daily high temperatures that are warmer than the historic average by 2.7°F from 2006 to 2039, by 5.8°F from 2040 to 2069, and by 8.8°F from 2070 to 2100 (OPR et al. 2018).

Since its previous climate change assessment in 2012, California has experienced several of the most extreme natural events in its recorded history: a severe drought from 2012 to 2016, an almost nonexistent Sierra Nevada winter snowpack in 2014–2015, increasingly large and severe wildfires, and back-to-back years of the warmest average temperatures (OPR et al. 2018). According to the California Natural Resource Agency's *Safeguarding California Plan: 2018 Update*, California experienced the driest four-year statewide precipitation on record from 2012 through 2015; the warmest years on average in 2014, 2015, and 2016; and the smallest and second smallest Sierra snowpacks on record in 2015 and 2014, respectively (CNRA 2018). According to the National Oceanic and Atmospheric Administration and National Aeronautics and Space Administration, 2016, 2017, and 2018 were the hottest recorded years in history (NOAA 2019). In contrast, the northern Sierra Nevada experienced one of its wettest years on record during the 2016–2017 water year (CNRA 2018).

The changes in precipitation exacerbate wildfires throughout California through a cycle of high vegetation growth coupled with dry, hot periods, which lowers the moisture content of fuel loads. As a result, the frequency, size, and devastation of forest fires have increased. In November 2018, the Camp Fire destroyed the town of Paradise in Butte County and caused 85 fatalities, making it the state's deadliest fire in recorded history. Moreover, changes in the intensity of precipitation events after wildfires can result in devastating landslides. In January 2018, after the Thomas Fire, 0.5 inch of rain fell in five minutes in Santa Barbara, causing destructive mudslides to form from the debris and loose soil left behind by the fire. These mudslides resulted in 21 deaths.

As the temperature increases, the amount of precipitation falling as rain rather than snow also increases, which could lead to increased flooding because water that would normally be held in the snowpack of the Sierra Nevada and Cascade Range until spring would flow into the Central Valley during winter rainstorm events. This scenario would place more pressure on California's levee/flood control system (CNRA 2018). Furthermore, in the extreme scenario involving the rapid loss of the Antarctic ice sheet

and the glaciers atop Greenland, the sea level along California’s coastline is expected to rise 54 inches by 2100 if GHG emissions continue at current rates (OPR et al. 2018).

Temperature increases and changes to historical precipitation patterns will likely affect ecological productivity and stability. Existing habitats may migrate from climatic changes where possible, and those habitats and species that lack the ability to retreat will be severely threatened. Altered climate conditions will also facilitate the movement of invasive species to new habitats, thus outcompeting native species. Altered climatic conditions dramatically endanger the survival of arthropods (e.g., insects, spiders), which could have cascading effects throughout ecosystems (Lister and Garcia 2018). Conversely, a warming climate may support populations of other insects such as ticks and mosquitoes, which transmit diseases harmful to human health such as the Zika virus, the West Nile virus, and Lyme disease (European Commission Joint Research Centre 2018).

Changes in temperature, precipitation patterns, extreme-weather events, wildfires, and sea-level rise have the potential to threaten transportation and energy infrastructure, crop production, forests and rangelands, and public health (CNRA 2018; OPR et al. 2018). The effects of climate change will also have an indirect adverse impact on the economy, as more severe natural disasters can cause expensive physical damage to communities and the state. In addition, adjusting to the physical changes associated with climate change can produce mental health impacts such as depression and anxiety.

7.3 REGULATORY SETTING

The regulatory setting described on pages 12-5 through 12-14 of the GPU EIR is incorporated by reference. Applicable federal, State, and local regulations that have seen changes or updates since the adoption of the GPU EIR or those that were not included in the GPU EIR are described below. Where relevant, implementation programs are also discussed.

7.3.1 FEDERAL

CORPORATE AVERAGE FUEL ECONOMY STANDARD

In October 2012, the U.S. Environmental Protection Agency and National Highway Traffic Safety Administration (NHTSA), on behalf of the U.S. Department of Transportation, issued final rules to further reduce GHG emissions and improve Corporate Average Fuel Economy (CAFE) standards for light-duty vehicles for model year (MYs) 2017 and beyond (77 *Federal Register* [FR] 62624, October 15, 2012). The most recent CAFE standards are for MYs 2024–2026. The amended CAFE standards increase in stringency for both passenger cars and light trucks, by 8 percent per year for MYs 2024–2025 and by 10 percent per year for MY 2026. NHTSA currently projects that the standards will require, on an average industry fleet-wide basis, roughly 49 miles per gallon for MY 2026 (Code of Federal Regulations Title 49, Section 531 et seq.).

ENERGY INDEPENDENCE AND SECURITY ACT

The Energy Independence and Security Act of 2007 is designed to improve vehicle fuel economy and help reduce U.S. dependence on oil. It represents a major step forward in expanding the production of renewable fuels, reducing dependence on oil, and confronting global climate change. The act increased the supply of alternative fuel sources by setting a mandatory Renewable Fuel Standard, which required fuel producers to use at least 36 billion gallons of biofuel in 2022 and reduced U.S. demand for oil by setting a national fuel economy standard of 35 miles per gallon by 2020.

7.3.2 STATE

STATEWIDE EMISSIONS TARGETS

SENATE BILL 375 (2008)

Senate Bill (SB) 375 was signed into law in September 2008. This law aligns regional transportation planning efforts, regional GHG emission reduction targets, and land use and housing allocation. SB 375 requires metropolitan planning organizations (MPOs) to adopt a sustainable communities strategy (SCS) or alternative planning strategy, showing prescribed land use allocation in each MPO's regional transportation plan. The California Air Resources Board (CARB), in consultation with the MPOs, is to provide each affected region with reduction targets for GHGs emitted by passenger cars and light trucks for 2020 and 2035. These plans link land use and housing allocation to transportation planning and related mobile-source emissions.

The Sacramento Area Council of Governments (SACOG) serves as the MPO for Sacramento, Placer, El Dorado, Yuba, Sutter, and Yolo counties, excluding those lands located in the Tahoe Basin. SACOG was tasked by CARB to achieve a 7 percent per capita reduction compared to 2012 emissions by 2020 and a 16 percent per capita reduction by 2035, both of which CARB confirmed that the region would achieve by implementing the Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS) (SACOG 2016: 172; CARB 2018: 1). In March 2018, CARB promulgated revised targets tasking SACOG with achieving a 19 percent per capita reduction by 2035 (CARB 2018: 1). Under SB 375, SACOG adopted its most recent MTP/SCS in 2020. SACOG plans to update the MTP/SCS by fall 2025.

EXECUTIVE ORDER S-3-05

Issued by Governor Arnold Schwarzenegger on June 1, 2005, California Governor's Executive Order (EO) S-3-05 set intermittent emissions reduction targets intended to provide incremental progress toward Assembly Bill (AB) 32's GHG emissions reduction target of reducing emissions to 1990 levels by 2020. EO S-3-05 set forth the following GHG reduction targets:

- By 2010, reduce GHG emissions to 2000 levels.
- By 2020, reduce GHG emissions to 1990 levels.
- By 2050, reduce GHG emissions to 80 percent below 1990 levels.

EXECUTIVE ORDER B-30-15

On April 15, 2015, Governor Edmund G. Brown Jr. issued EO B-30-15 to establish a California GHG reduction target of 40 percent below 1990 levels by 2030. EO B-30-15 was issued to align California's GHG emissions reduction targets with those of leading international governments ahead of the United Nations Climate Change Conference in Paris, held in 2015.

The emissions reduction target of 40 percent below 1990 levels by 2030 is intended to keep California on track to reach the ultimate goal of reducing emissions 80 percent below 1990 levels by 2050.

SENATE BILL 32 AND ASSEMBLY BILL 197 (2016)

SB 32 and AB 197, signed into law in August 2016, serve to extend California's GHG emissions reduction programs beyond 2020. SB 32 amended the Health and Safety Code to include Section 38566, which contains language authorizing CARB to achieve a statewide GHG emissions reduction of at least 40 percent below 1990 levels by no later than December 31, 2030. SB 32 codified the targets established by EO B-30-15 for 2030, which set the next interim step in the State's continued efforts to pursue the long-term target expressed in EO S-3-05, which is a reduction of 80 percent below 1990 emissions levels by 2050.

ASSEMBLY BILL 1279

On September 16, 2022, the California Legislature enacted AB 1279, which codified stringent emissions targets for the State of achieving carbon neutrality no later than 2045 and negative emissions thereafter, and an 85 percent reduction in 1990 emissions level by 2045. (This superseded the previous GHG emissions reduction target set forth by EO S-3-05.)

CLIMATE CHANGE SCOPING PLAN

After AB 1279 was enacted, CARB released the *Final 2022 Scoping Plan for Achieving Carbon Neutrality* (2022 Scoping Plan) on November 16, 2022, as also directed by AB 1279 (CARB 2022). The 2022 Scoping Plan traces the pathway for the State to achieve its carbon neutrality and an 85 percent reduction in 1990 emissions goal by 2045, as well as the short-term GHG reduction goal of 40 percent below 1990 emissions by 2030 pursuant to SB 32. CARB adopted the 2022 Scoping Plan on December 16, 2022.

ADVANCED CLEAN CARS PROGRAM

In January 2012, CARB approved the Advanced Clean Cars Program, which combines the control of GHG emissions and criteria air pollutants, as well as requirements for greater numbers of zero-emission vehicles (ZEVs), into a single package of regulatory standards for vehicles for MYs 2017–2025. The new regulations strengthened the GHG standards for 2017 models and beyond. In addition, the program's ZEV regulation requires battery, fuel cell, and plug-in hybrid electric vehicles (EVs) to account for up to 15 percent of California's new vehicle sales by 2025. In the first quarter of 2024, ZEV sales accounted for almost 24 percent of total vehicle sales in California (CEC 2024). In August

2022, CARB adopted the Advanced Clean Cars II Program, which set sales requirements to ultimately reach the goal of 100 percent ZEV sales in California by 2035 as set forth in EO N-79-20, described further below.

ADVANCED CLEAN FLEETS PROGRAM

On September 29, 2023, the Office of Administrative Law approved CARB's Advanced Clean Fleets rule, which became State law on October 1, 2023. This regulation is part of CARB's broader strategy to accelerate the transition to zero-emissions medium- and heavy-duty vehicles. It complements the Advanced Clean Trucks regulation, focusing on reducing emissions and promoting the adoption of ZEVs. The Advanced Clean Fleets regulation covers various fleet types, including drayage operations, government-owned fleets, and high-priority fleets, mandating ZEV adoption in phases. Key provisions include manufacturer sales mandates, requirements for drayage fleets to transition to ZEVs, and specific ZEV targets for high-priority and government fleets. The Advanced Clean Fleets regulation states that manufacturers may sell only zero-emissions medium- and heavy-duty vehicles in California starting in 2036 and that high-priority fleets must purchase only ZEVs beginning in 2024 and, starting January 1, 2025, must remove internal combustion engine vehicles at the end of their useful life, or that high-priority fleets must achieve 100 percent ZEVs by 2042 (CARB 2023b). The regulation is expected to significantly reduce emissions, benefit public health, and contribute to achieving climate goals.

CALIFORNIA RENEWABLES PORTFOLIO STANDARD

SB X1-2 (2011) requires all California utilities to generate 33 percent of their electricity from renewables by 2020. SB 100 (2018) sets a three-stage compliance period requiring all California utilities, including independently owned utilities, energy service providers, and community choice aggregators, to generate 52 percent of their electricity from renewables by December 31, 2027; 60 percent by December 31, 2030; and 100 percent carbon-free electricity by December 31, 2045.

On September 16, 2022, SB 1020 was signed into law, superseding the goals of SB 100. SB 1020 requires that eligible renewable energy resources and zero-carbon resources supply 90 percent of all retail sales of electricity to California end-use customers by December 31, 2035, increasing to 95 percent by December 31, 2040, and 100 percent by December 31, 2045; and that eligible renewable energy resources and zero-carbon resources supply 100 percent of electricity procured to serve all State agencies by December 31, 2035.

EXECUTIVE ORDER N-79-20

In September 2020, Governor Gavin Newsom signed EO N-79-20. This executive order established a State goal that 100 percent of in-state sales of new passenger cars and trucks will be zero-emission by 2035, and 100 percent of medium- and heavy-duty vehicles in California will be zero-emission by 2045 (by 2035 for drayage trucks, i.e., short-distance container trucks), and that California will transition to 100 percent zero-emission off-road vehicles and equipment by 2035.

BUILDING ENERGY EFFICIENCY STANDARDS

TITLE 24, PART 6

The energy consumption of new residential and nonresidential buildings in California is regulated by the State's Title 24, Part 6, Building Energy Efficiency Standards (California Energy Code). The California Energy Commission (CEC) updates the California Energy Code every 3 years with more stringent design requirements for reduced energy consumption, which results in the generation of fewer GHG emissions.

The current California Energy Code requires builders to use more energy-efficient building technologies for compliance with increased restrictions on allowable energy use. The core focus of the building standards has been efficiency, but the 2019 California Energy Code ventured into on-site generation by requiring solar photovoltaic systems on new homes, providing significant GHG savings. Most recently, the 2022 California Energy Code advanced the on-site energy generation progress started in the 2019 code by encouraging electric heat pump technology and use, establishing electric-ready requirements when natural gas is installed, expanding standards for solar photovoltaic systems and battery storage, and strengthening ventilation standards to improve indoor air quality. CEC estimates that the 2022 California Energy Code will save consumers \$1.5 billion and reduce GHG emissions by 10 MMTCO_{2e} over the next 30 years (CEC 2021).

TITLE 24, PART 11

The California Green Building Standards Code, referred to as the CALGreen Code, was added to Title 24 as Part 11, first in 2009 as a voluntary code, which then became mandatory effective January 1, 2011 (as part of the 2010 California Building Standards Code). The current version is the 2022 CALGreen Code, which took effect on January 1, 2023. The code sets design requirements equivalent to or more stringent than those of the California Energy Code for energy efficiency, water efficiency, waste diversion, and indoor air quality. These codes are adopted by local agencies that enforce building codes and used as guidelines by State agencies for meeting the requirements of EO B-18-12.

SENATE BILL 1383

In September 2016, SB 1383 (Lara, Chapter 395, Statutes of 2016) was signed into law, establishing methane emissions reduction targets in a statewide effort to reduce emissions of short-lived climate pollutants in various sectors of California's economy.

As it pertains to solid waste, SB 1383 establishes targets to achieve a 75 percent reduction in the volume of statewide disposal of organic waste by 2025. The law grants the California Department of Resources Recycling and Recovery the regulatory authority required to achieve the organic waste disposal reduction targets. It established an additional target: not less than 20 percent of currently disposed edible food is to be recovered for human consumption by 2025.

7.3.3 LOCAL

SACRAMENTO MUNICIPAL UTILITY DISTRICT

In July 2020, the Sacramento Municipal Utility District (SMUD) Board of Directors adopted a climate emergency declaration that committed to working toward an ambitious goal of delivering carbon neutral electricity by 2030. The 2030 Clean Energy Vision is SMUD's overarching goal to reach zero-carbon emissions in its power supply by 2030. The 2030 Zero Carbon Plan, adopted March 30, 2021, is the road map for SMUD to achieve the zero-carbon goal through 100 percent renewable generation by 2030, 15 years in advance of the State-mandated Renewable Portfolio Standards.

SACRAMENTO AIR QUALITY MANAGEMENT DISTRICT

The Sacramento Air Quality Management District (SMAQMD) is the primary agency responsible for addressing air quality concerns in all of Sacramento County. SMAQMD also recommends methods for analyzing project-generated GHG emissions in CEQA analyses and offers multiple potential measures for reducing GHG emissions from land use development projects.

SMAQMD developed thresholds of significance to provide a uniform scale for measuring the significance of GHG emissions from land use and stationary-source projects in compliance with CEQA and AB 32. SMAQMD's goals in developing GHG thresholds include ease of implementation; use of standard analysis tools; and emissions mitigation consistent with AB 32. On October 23, 2014, the SMAQMD Board of Directors adopted the GHG thresholds. On April 23, 2020, the SMAQMD Board of directors adopted an updated land development GHG threshold, including best management practices (BMPs).

For land development and construction projects, SMAQMD's GHG emissions threshold is 1,100 metric tons of carbon dioxide equivalent (MTCO_{2e}) per year during the construction phase. The operational-phase emissions threshold requires projects to demonstrate consistency with the 2022 Scoping Plan's goal to achieve carbon neutrality by 2045 by implementing applicable BMPs, or equivalent on-site or off-site mitigation. All projects must implement Tier 1 BMPs, which include BMPs 1 and 2, which require that projects be designed and constructed without natural gas infrastructure (BMP 1) and meet the current CALGreen 2 standards with a requirement to be EV capable rather than EV ready (BMP 2). For projects that exceed 1,100 MTCO_{2e}/year, after implementation of BMPs 1 and 2, BMP Tier 2 implementation is required. Tier 2 BMP 3 sets a target for all residential and office projects to achieve a 15 percent vehicle miles traveled (VMT) reduction per resident and worker compared to existing regional-average VMT and retail projects must achieve no net increase in VMT compared to a regional average, as mandated by SB 743. There are also stationary-source GHG emissions thresholds, but these do not apply to the CAP because the CAP would not result in stationary GHG-emitting sources (SMAQMD 2021). SMAQMD's thresholds were adopted by the County in December 2020.

SACRAMENTO COUNTY

SACRAMENTO COUNTY GENERAL PLAN UPDATE

The Air Quality Element and Energy Element of the General Plan contain the following GHG-related policies that are applicable to the CAP:

- AQ-2.** Support Regional Transit's efforts to secure adequate funding so that transit is a viable transportation alternative. Development shall pay its fair share of the cost of transit facilities required to serve the project.
- AQ-4.** Developments which meet or exceed thresholds of significance for ozone precursor pollutants, and/or GHGs as adopted by SMAQMD, shall be deemed to have a significant environmental impact. An Air Quality Mitigation Plan and/or a Greenhouse Gas Reduction Plan shall be submitted to the County of Sacramento prior to project approval, subject to review and recommendation as to technical adequacy by the Sacramento Metropolitan Air Quality Management District.
- AQ-6.** Provide incentives for the use of transportation alternatives, including a program for the provision of financial incentives for builders that construct ownership housing within a quarter-mile of existing and proposed light rail stations.
- AQ-11.** Encourage contractors operating in the county to procure and to operate low-emission vehicles, and to seek low-emission fleet status for their off-road equipment.
- AQ-18.** Require the recovery of chlorofluorocarbons (CFCs) when older air conditioning and refrigeration units are serviced or disposed.
- AQ-22.** Reduce greenhouse gas emissions from County operations as well as private development.
- EN-3.** Encourage the conservation and rehabilitation of existing housing and the revitalization of older, more intensively developed neighborhoods in the urban area.
- EN-5.** Reduce travel distances and reliance on the automobile and facilitate increased use of public transit through appropriate land use plans and regulations.

SACRAMENTO COUNTY CLIMATE EMERGENCY RESOLUTION

The Climate Emergency Resolution approved by the County Board of Supervisors in December 2020 declared a climate emergency and calls for County action to chart a path toward and achieve carbon neutrality by 2030. The County's goal is aligned with EO B-55-18 related to achieving carbon neutrality.

7.4 SIGNIFICANCE CRITERIA AND METHODOLOGY

7.4.1 SIGNIFICANCE CRITERIA

The significance criteria used to evaluate project impacts on climate change under CEQA are based on CEQA Guidelines Section 15064 and relevant portions of CEQA Guidelines Appendix G, which recommend that a lead agency consider a project’s consistency with relevant adopted plans and discuss any inconsistencies with applicable regional plans, including plans to reduce GHG emissions. Implementation of the CAP would result in a cumulatively considerable contribution to climate change if it would:

- generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment; or
- conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs.

7.4.2 METHODOLOGY

The CAP is a policy document and does not propose any specific future projects. As described in Chapter 1, “Introduction,” this SEIR considers the broad environmental implications of implementing the CAP on a conceptual basis and does not provide a project-level assessment. Impacts related to GHG emissions were analyzed qualitatively based on a review of the CAP measures and actions and their potential to result in physical changes to the environment if the CAP is approved and implemented. In addition to this qualitative analysis, this SEIR presents the quantification of forecast GHG emissions in the CAP to address the effects of adopting the CAP on communitywide emissions.

GREENHOUSE GAS EMISSIONS

With respect to GHG emissions, CEQA Guidelines Section 15064.4(a) states that lead agencies “shall make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate or estimate” GHG emissions resulting from a project. The CEQA Guidelines note that an agency has the discretion to either quantify a project’s GHG emissions or rely on a “qualitative analysis or performance-based standards” (Section 15064.4[a]). A lead agency may use a “model or methodology” to estimate GHG emissions and has the discretion to select the model or methodology it considers “most appropriate to enable decision makers to intelligently take into account the project’s incremental contribution to climate change” (Section 15064.4[c]). The CEQA Guidelines provide that the lead agency should consider the following when determining the significance of impacts from GHG emissions on the environment (Section 15064.4[b]):

- The extent a project may increase or reduce GHG emissions as compared to the existing environmental setting.
- Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project.

- The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions.

At the programmatic level, it is not possible to estimate the exact emissions from construction and operation of individual projects constructed to implement the CAP. Details such as individual project location, scale, construction phasing, and exact equipment types and numbers are not known at this level of analysis. Therefore, this analysis uses a qualitative approach to determine whether implementing the CAP could result in GHG-related impacts based on the criteria above.

However, the analysis does include a 2021 baseline GHG emissions inventory and projections of 2030 and 2045 emissions. The analysis considers both a business-as-usual (BAU) scenario and an adjusted BAU (ABAU) scenario. The BAU scenario is an emissions forecast out to the year 2045 that indicates how community emissions would increase in the absence of State regulations (e.g., standards for renewable energy and vehicle fuel efficiency) and without any additional actions by the County to reduce emissions. This accounts for the growth in population, housing, and employment expected for Sacramento County through the year 2045. The “adjusted BAU” scenario accounts for the expected impacts of foreseeable federal, State, and regional actions, based on the latest information from CARB and the 2022 Scoping Plan. Among the State measures are the Pavley vehicle standards, the Mobile Source Strategy, Advanced Clean Cars, and Title 24 Building Energy Standards updates. As shown in Table 2-3 on Chapter 2, “Project Description,” of this SEIR, the CAP estimates that the unincorporated county’s unmitigated (i.e., BAU) emissions would reach 4.8 MMTCO_{2e} by 2030 and 5.8 MMTCO_{2e} by 2045. The CAP also estimates that the unincorporated county’s adjusted BAU with federal and State action would decline to 3.8 MMTCO_{2e} by 2030 and 2.0 MMTCO_{2e} by 2045.

The unincorporated county’s emissions with CAP implementation have been compared to the following future targets:

1. The CAP’s target of 39 percent below 2021 levels by 2030, which exceeds the statewide 2030 target of 40 percent below 1990 levels as codified in SB 32 and aligns with the 2022 Scoping Plan scenario.
2. The CAP’s target of 83 percent below 2021 levels by 2045, which aligns with the statewide 2045 target of 85 percent below 1990 levels as codified in AB 1279 and included in the 2022 Scoping Plan.

In addition, as codified in AB 1279 and included in the 2022 Scoping Plan, statewide carbon neutrality is to be achieved by 2045 or sooner. The CAP’s 2045 reduction target and aspirational goal to achieve countywide carbon neutrality by 2045 aligns with this statewide target and sets the unincorporated county on the pathway to achieving carbon neutrality by 2045.

The CAP’s 2030 target would be achieved by requiring local land use developments to contribute their “fair share” of emissions reductions to the statewide GHG emissions

target for 2030. This is also consistent with the recommendation made in the Association of Environmental Professionals' 2016 white paper for "Substantial Progress" thresholds for land use development to show consistency with statewide targets (AEP 2016). Consequently, pursuant to CEQA Guidelines Section 15064.4(b)(3), the CAP's 2030 target represents the level below which GHG emissions would not be cumulatively considerable through the year 2030.

The CAP's 2045 target of 83 percent below 2021 levels aligns with the statewide 2045 target, as codified in AB 1279 and the 2022 Scoping Plan. This is because the County's 2045 target of 85 percent below 2021 levels is equivalent to an 85 percent reduction below 1990 levels, which aligns with the State of California's target of 85 percent below 1990 levels. Consequently, the CAP is equivalent to the State target.

The CAP's 2045 target also sets the County on a trend to help achieve California's 2045 GHG carbon neutrality target. Therefore, pursuant to CEQA Guidelines Section 15064.4(b)(3), the CAP's 2045 target represents the level below which GHG emissions would not be cumulatively considerable through the year 2045.

For calculation details, assumptions, and tables related to the 2021 baseline GHG inventory, projections of 2030 and 2045 emissions, and CAP measures and actions, see CAP Appendix C, *2021 GHG Emissions Inventory*; Appendix D, *GHG Forecasts and Targets Analysis*; and Appendix E, *GHG Reduction Measures Analysis*.

PLANS, POLICIES, AND REGULATIONS

GHG impacts have been evaluated by assessing whether the CAP conflicts with applicable GHG emissions reduction strategies and local actions approved or adopted by CARB, SACOG, and the County. The 2022 Scoping Plan, SACOG's 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), and General Plan policies and goals all apply to the project and all are intended to reduce GHG emissions to meet the statewide targets set forth in AB 32, as amended by SB 32, and AB 1279. Thus, the significance of the CAP's GHG emissions has been evaluated consistent with CEQA Guidelines Section 15064.4(b)(2) by considering whether the CAP would conflict with applicable plans, policies, and regulations adopted for the purpose of reducing GHG emissions, including CARB's 2022 Climate Change Scoping Plan, SB 37, AB 1279, SACOG's RTP/SCS, and the CALGreen Code and County Green Building Code.

CEQA Guidelines Section 15064.4(b)(3) states that a lead agency "may consider a project's consistency with the state's long-term climate goals or strategies" when determining the significance of a project's impacts." Additionally, in *Center for Biological Diversity v. Department of Fish and Wildlife* (2015) 62 Cal.4th 204, the California Supreme Court sanctioned the use of such a threshold: The court stated that assessing a project's GHG impacts based on a "consistency with a GHG emission reduction plan" threshold of significance is legally permissible under CEQA.

7.5 IMPACTS AND ANALYSIS

7.5.1 IMPACT CC-1: GENERATE GREENHOUSE GAS EMISSIONS, EITHER DIRECTLY OR INDIRECTLY, THAT MAY HAVE A SIGNIFICANT IMPACT ON THE ENVIRONMENT

GENERAL PLAN UPDATE EIR DETERMINATION

Impacts of the General Plan on climate change are evaluated on pages 12-26 to 12-39 of the GPU EIR. The GPU EIR evaluated the potential effects of buildout of the General Plan related to consistency with the goals and strategies of AB 32. The GPU EIR determined that implementation of the General Plan would have a significant and unavoidable impact related to compliance with AB 32 because of the uncertain nature of the impact.

The impact finding was based on the uncertainty surrounding the implementation of SB 375 and the effect of its implementation on the adoption of local goals for reducing transportation-related GHG emissions, as these goals had not been developed at the time of the writing of the GPU EIR. When the GPU EIR was written, AB 32 required that emissions be reduced to 1990 levels by the year 2020, which was estimated in the AB 32 Scoping Plan to be 15 percent below then-existing (2005) emissions. As the only regulatory document adopted by the State that set a GHG emissions reduction goal at the time, the GPU EIR relied on the underlying strategy and assumptions of the AB 32 Scoping Plan to develop County targets. Therefore, the GPU EIR determined that emissions would need to be reduced to 1990 levels by 2020. Reducing the modeled 2005 emissions by 15 percent (see the discussion above), the County's 1990 baseline is 5,572,432 MTCO_{2e}. Buildout of the General Plan was shown to result in a 6.7 MMTCO_{2e} increase above 2005 baseline levels by the year 2030. This amount was 7.7 million metric tons (MMT) above the 1990 levels required by AB 32 and was determined to be a **significant and unavoidable** impact after mitigation. Adopted Mitigation Measures CC-1 and CC-2 in the GPU EIR required the County to adopt the AB 32 goal as a General Plan policy, to implement a CAP, and to develop GHG emissions thresholds.

As described above and in Chapter 2, "Project Description," of this SEIR, a current (2021) GHG emissions inventory and forecasts have been prepared to characterize existing and projected conditions with the adopted General Plan and absent the proposed CAP. These emissions are summarized in Table 7-2. Projected GHG emissions in the ABAU forecast—which includes reductions from currently adopted federal and State legislation, regulations, and other foreseeable actions outside of the County's jurisdictional control that will reduce emissions—indicate that the County would continue to exceed emissions standards without adoption of the CAP.

**Table 7-2: Emissions Inventory and Adjusted Business-as-Usual
2030 Forecast Summary**

	Total GHG Emissions (2021)	Projected ABAU GHG Emissions (2030)
Sacramento County Community GHG Emissions (MTCO _{2e} /year)	4,159,556	3,829,056
Sacramento Government Operations GHG Emissions (MTCO _{2e} /year)	81,903	85,808

NOTES: ABAU = adjusted business as usual; GHG = greenhouse gas; MTCO_{2e} = metric tons of carbon dioxide equivalent

Source: Sacramento County 2024: Appendix D: Tables 16 and 17

It should be noted that the GPU EIR did not evaluate construction-related emissions from off-road vehicles. The GPU EIR stated that emissions from construction equipment would need to be addressed on a per-project basis, according to the size of the site, the type of development proposed, and the type of equipment to be used (Sacramento County 2010).

PROPOSED CLIMATE ACTION PLAN IMPACT ANALYSIS

CONSTRUCTION

The CAP is a policy-level document that does not include any site-specific designs or proposals or grant any entitlements for development; however, construction and operation of facilities identified in GHG emissions reduction measures and adaptation strategies that would be implemented with CAP adoption have the potential to directly or indirectly emit GHGs.

CAP measures and actions may result in construction activities that would generate GHG emissions. These measures and actions include those that could result in the construction of new EV charging stations (Measure GHG-07), minor bicycle and pedestrian infrastructure (e.g., bike lanes, bike parking, pedestrian paths) (Measures GHG-11 and GHG-12, and Actions TEMP-07-a, and TEMP-07-d), new infrastructure to improve access to transit and increase transit ridership (Measure GHG-09), new renewable energy systems (Measures GHG-03 and GHG-05), construction of new renewable energy generation and storage projects (Action GHG-03-b and Action GHG-03-d), construction and operation of composting facilities (Action GHG 14-a and Action GHG-14-b); infill development (Measure GHG-13), and tree and vegetation planting (Measure GHG-02). removal of existing and installation of new landscaping (Actions GOV-05-d, GOV-05-e, TEMP-08-f, WATER-04-a, and WATER-04-b); installation of water reuse systems (Actions WATER-02-a, WATER 02-d, and WATER-02-e); and flood protection projects (Actions FLOOD-01-a, FLOOD-05-a, FLOOD-05-b, FLOOD-06-b, FLOOD-07-a, FLOOD-08-b, FLOOD-08-c, FLOOD-10-a, FLOOD-11-a, FLOOD-12-a, and FLOOD-14-a).

This type of construction activity is generally done using hand tools and small machinery (with limited use of heavy-duty construction equipment) and would involve

minimal numbers of construction workers and associated worker vehicle trips. Furthermore, Measure GHG-16 would encourage the adoption of electric construction equipment through incentives and outreach efforts. This measure would limit GHG emissions related to fossil fuel combustion in construction equipment during implementation of the measures identified above. In addition, Action GHG-16-e would require all projects to implement SMAQMD Basic Construction Emission Control Practices to reduce construction emission as part of project condition approval. Therefore, associated construction-related GHG emissions would also be minimal.

Additionally, projects implemented under the CAP would be required to comply with all applicable General Plan policies, such as Policy AQ-11, which involves encouraging contractors operating in the county to procure and operate low-emission vehicles and to seek low-emission fleet status for their off-road equipment; and Policy AQ-16, which prohibits the idling of on-and off-road engines when the vehicles are not moving or when the off-road equipment is not performing work for more than 5 minutes in any one-hour period. Utilizing low-emissions fleets and limiting the amount of time equipment is being used would minimize GHG emissions from the combustion of fossil fuels.

CAP Measure GHG-14 would increase the diversion of organic waste deposited into landfills from both commercial and residential sources to achieve a 75 percent diversion rate by 2030 and a 90 percent rate by 2045 and increase gas collection at County-owned landfills. Implementation of the measure would require increased local capacity for composting and processing of organic waste; however, this aligns with the State's diversion targets and associated demand for expanded facilities. Therefore, associated construction emissions to develop facilities would not be a direct result of the CAP and would not result in GHG emissions that are substantially greater than assumed for buildout of the General Plan.

Construction activities for CAP projects would not be expected to exceed SMAQMD's GHG emissions thresholds (i.e., 1,100 MTCO₂e/year), given the expected small size of individual projects. Moreover, all potential emissions sources and activity types are consistent with those previously evaluated in the GPU EIR. Therefore, the proposed CAP would not result in new or substantially more severe climate change impacts from construction emissions compared to what was already disclosed in the GPU EIR.

OPERATIONS

Implementation of CAP measures and actions would result in new facilities such as new EV charging stations (Measure GHG-07), minor bicycle and pedestrian infrastructure (Measures GHG-11 and GHG-12), new infrastructure to improve access to transit and increase transit ridership (Measure GHG-09), new renewable energy systems (Measures GHG-03 and GHG-05), minor residential and commercial retrofits (Measure GHG-04), advanced infill development (Measure GHG-13), new infrastructure to capture additional landfill gas (Measure GHG-14), and tree and vegetation planting (Measure GHG-02). These measures would involve occasional maintenance activities (e.g., use of maintenance vehicles, equipment replacement, tree watering and trimming, vegetation management). These maintenance activities would be minimal or accomplished with existing personnel and in conjunction with established maintenance

activities; thus, associated operational GHG emissions would also be minimal or would not increase.

Some GHG emissions could occur from the treatment and transportation of water used to irrigate the new trees. However, because the measures would collectively reduce countywide GHG emissions, it can be assumed that any operational GHG emissions would be offset by the overall net benefit of GHG emissions reductions that would result from implementation of the proposed CAP measures.

CAP Measure GHG-14 would increase the diversion of organic waste from landfills, as required by SB 1383. As a result, the CAP may indirectly result in expanded local capacity for composting and processing of organic waste and indirectly result in additional truck hauling trips to support increased local composting capacity. However, these trips would be diverted from landfills within the county. In addition, implementation of Measure GHG-14 would result in decreased methane emissions from landfills, which is a high-global-warming-potential gas known to accelerate anthropogenic climate change. Therefore, substantial operational emissions from increased truck trips are not anticipated.

The proposed CAP would reduce GHG emissions in the county compared to existing and future conditions under General Plan buildout. For example, Measure GHG-06 would involve the trade-in of fossil fuel-powered landscaping equipment for electric equipment. This measure would include actions such as Action GHG-06-a, which would involve coordination with SMAQMD to implement a landscaping equipment trade-in program, which would provide vouchers for the purchase of electric landscape equipment to residents and businesses that trade in fossil fuel-powered landscaping equipment at the North Area Recovery Facility. Action GHG-06-b would explore the feasibility of, and funding opportunities for, expanding the landscaping equipment trade-in program. Such an effort may include organizing trade-in events at convenient locations for residents throughout the county and establishing additional permanent drop-off locations at other County-operated facilities.

Additionally, transportation-related measures would reduce VMT per capita and increase EV usage to reduce the consumption of fossil fuels and associated GHG emissions. Specifically, Measure GHG-07 involves planning for and deploying increased zero-emission vehicle infrastructure such as EV chargers; Measure GHG-08 would develop a VMT impact fee program to require developers to contribute to regional VMT reductions when project-specific VMT cannot be mitigated to below significance thresholds after all feasible on-site mitigation has been implemented; Measure GHG-09 involves updating the requirements in transportation system management plans to include a target for new development of a 15 percent reduction in annual VMT below the regional average; and Measure GHG-11 involves increasing transit ridership by 16 percent above 2021 levels by 2030 and 43 percent by 2045, through implementation of the Circulation Element's "Transit" policy plan.

Examples of actions that would support EV use include Action GHG-07-a, which would require developing and adopting an ordinance that amends the building code to require

EV charging capability in new residential and nonresidential developments consistent with the CALGreen Code's Tier 2 requirements; and Action GHG-07-h, which would increase utilization of publicly accessible EV charging at Sacramento International Airport and installation of additional EV chargers as supported by demand. Examples of actions that would reduce VMT include Action GHG-09-d, which would require imposing a fee structure for projects that do not meet the requirements for employee commute trip reduction and using the fees collected to fund micro transit or other trip reduction projects; and Action GHG-11-b, which would require updating the Traffic Impact Analysis Guidelines to require projects near transit to improvements to and support of transit access.

Encouraging EV use by installing EV chargers and reducing VMT by improving access to public transit and encouraging future projects to meet VMT reduction goals would collectively reduce transportation-related GHG emissions in the county by reducing the combustion of fossil fuels. Additionally, CAP measures that pertain to the planning and design of communities would support infill, transit-oriented development, and mixed-use projects (Measures GHG-10 and GHG-13). These types of developments, which are consistent with the General Plan, are intended to reduce VMT and would also reduce countywide GHG emissions from the combustion of fossil fuels.

The CAP would also be beneficial in terms of reducing energy-related emissions. Examples of measures that would achieve this objective are Measures GHG-05 and GOV-4. Measure GHG-05 would require all newly built projects to achieve specific performance standards to maximize energy efficiency and decarbonization, while Measure GOV-4 would require development of a decarbonization plan for County buildings and facilities by 2026 and reduction of natural gas use in County buildings to 85 percent below 2021 levels by 2045. This would be achieved through actions such as Action GHG-05-a, which would require working with the California Energy Codes and Standards Program to develop cost-effective reach codes that must be met by all new construction. The reach codes would require that residential projects meet or exceed a modeled EDR1 (Energy Design Rating) metric of 11.5 points above the Title 24, Part 6 statewide performance minimum (the "standard design building"), and that nonresidential projects reduce non-electricity emissions by 19 percent by 2030 and by 85 percent by 2045.

Additionally, Action GHG-05-b would provide fee reductions or offsets and expedited permitting for residential and nonresidential projects that are built all-electric and do not include new natural gas infrastructure piping. Action GOV-04-c would involve adopting an electric building policy requiring all newly constructed County buildings to include no natural gas infrastructure, with limited exceptions for cases where emergency power needs cannot be sufficiently met with battery storage. For equipment that cannot be electrified with currently available technology (e.g., high-heat processes), staff should first identify technological alternatives to natural gas combustions and provide evidence for infeasibility.

Other measures such as Measure GHG-04 would require that 28,000 residential units be retrofitted by 2030 at half of the maximum cost effectiveness score, that a strategy

be developed to reduce non-electricity emissions from nonresidential buildings by 19 percent by 2030 and 85 percent by 2045, and that a building performance standards program be implemented and enforced. By increasing the use of electricity and decreasing the use of natural gas combustion, the CAP would reduce countywide GHG emissions through a reduction in the combustion of fossil fuels used for building utilities.

The CAP would also reduce countywide GHG emissions related to the transportation and treatment of water and wastewater. Measure GOV-05 would improve water efficiency at County buildings, facilities, and landscaped areas to reduce water consumption by 11 percent in 2030 and 29 percent in 2045 below 2020 levels. This would be achieved through actions such as Actions GOV-05-b and GOV-05-c, which would involve the continued replacement of water fixtures with low-flow equivalents so that all County buildings and facilities use low-flow equipment by 2030 and the continued use of recycled water for landscaping, respectively. Measure GOV-05 and its associated actions would reduce energy use associated with the transportation and treatment of water.

SUMMARY

The CAP would be compliant with current regulatory standards, including those adopted after the GPU EIR was certified, which establish more stringent reduction targets than evaluated in the GPU EIR. As a result, implementation of the CAP, as currently proposed, would result in fewer GHG emissions than evaluated in the GPU EIR and the impact would be reduced. The overall net benefit of the CAP related to permanent reductions in GHG emissions countywide would be far greater than any short-term, minor construction-related GHG emissions. Further, the GPU EIR contemplated these types of developments and associated GHG emissions.

Additionally, as detailed below, Table 2.9 in Chapter 2 of the CAP demonstrates that to achieve the 2030 and 2045 emissions reduction targets, the CAP must reduce GHG emissions by 1,303,700 MTCO_{2e} from the 2030 ABAU forecast and 1,237,700 MTCO_{2e} from the 2045 ABAU forecast. As summarized in Table 2-3 in Chapter 2, “Project Description,” of this SEIR and Table 2.11 in Chapter 2 of the CAP, the communitywide GHG emissions reduction measures in the CAP would reduce annual community emissions by 1,427,900 and 1,243,200 MTCO_{2e}/year in 2030 and 2045, respectively, compared to the ABAU scenarios in the associated years, and would achieve the established targets. Table 2.10 in Chapter 2 of the CAP demonstrates that to achieve the 2030 and 2045 emissions reduction targets, the CAP must reduce GHG emissions from government operations by 36,100 MTCO_{2e} from the 2030 ABAU forecast and 27,400 MTCO_{2e} from the 2045 ABAU forecast. As summarized in Table 2-4 in Chapter 2, “Project Description,” of this SEIR and Table 2.12 in Chapter 2 of the CAP, government operations measures would reduce GHG emissions related to government operations by 36,400 MTCO_{2e} by 2030 and 34,500 MTCO_{2e} by 2045. Therefore, the CAP would achieve the emissions reduction goals for 2030 and 2045.

Notably, the emissions reduction quantified by the CAP would occur alongside the deployment of other environmental regulations that would achieve GHG emissions reductions independent of the CAP; this is accounted for in the ABAU scenarios modeled in Chapter 2 of the CAP. As countywide emissions trend down through 2045 in

the ABAU scenario, implementation of the CAP would serve to further reduce GHG emissions. Therefore, emissions reductions achieved by the CAP in 2045 would be less than the emissions reductions achieved in 2030 because the County could achieve fewer GHG emissions beyond those otherwise required through legislation.

For these reasons, the proposed CAP would not result in new substantial impacts related to GHG emissions not disclosed in the GPU EIR. Moreover, it would allow the County to accomplish important goals associated with GHG reductions under the General Plan to align with California's goals for GHG reduction under its various legislative and scoping plan targets. As described herein, the CAP would accomplish these targets and place the General Plan on a trajectory aimed at achieving targets into the future, past the 2030 horizon date of the General Plan. Overall, GHG emissions would be substantially reduced in 2030 and 2045 compared to the BAU scenario (i.e., implementation of the GPU without implementation of the measures and actions included in the CAP). The 2030 GHG reduction target would be met and the mitigation requirement for the General Plan would be fulfilled. The CAP's contribution to impacts would not be substantial and overall impacts would remain ***significant and unavoidable***.

MITIGATION MEASURES

No further mitigation is required.

7.5.2 IMPACT CC-2: CONFLICT WITH ANY APPLICABLE PLAN, POLICY, OR REGULATION OF AN AGENCY ADOPTED FOR THE PURPOSE OF REDUCING THE EMISSIONS OF GREENHOUSE GASES

GENERAL PLAN UPDATE EIR DETERMINATION

As discussed in Chapter 12, "Climate Change," of the GPU EIR under the section heading "Impact of the Project on Climate Change" (p. 12-26), the County set an emissions reduction target aligned with the AB 32 Scoping Plan, the only regulatory document adopted by the State at the time of preparation of the GPU EIR that had set a GHG reduction goal. The County's target was to reduce modeled GHG emissions for the 2005 baseline year projections by 15 percent by 2020. The GPU EIR identified a significant impact because the projected buildout of the proposed General Plan would result in a 6.7 MMT increase above the 2005 baseline level by 2020, which would be 7.7 MMT above the 1990 level required by AB 32. As a result, GPU EIR Mitigation Measures CC-1 and CC-2 directed the County to include a General Plan policy to set the AB 32 Scoping Plan's 2020 reduction goal as a County target and to develop a comprehensive plan laying out the policy framework and general strategies to reduce GHG emissions to help meet the 2020 target. Despite the application of mitigation, the GPU EIR determined that this impact would be ***significant and unavoidable***. The County is in the process of fulfilling its obligation under Mitigation Measure CC-2 by developing the CAP, which outlines ways to further reduce emissions aligned with State targets for future years.

PROPOSED CLIMATE ACTION PLAN IMPACT ANALYSIS

SACRAMENTO AREA COUNCIL OF GOVERNMENTS METROPOLITAN TRANSPORTATION PLAN/SUSTAINABLE COMMUNITIES STRATEGY

In 2019, SACOG adopted an update to the MTP/SCS that establishes policies and implementation actions for GHG emissions reductions in the on-road transportation sector, consistent with statewide targets set by CARB pursuant to SB 375. CAP measures are consistent with policy priorities discussed in Chapter 2, “Policies and Implementation,” of the 2020 MTP/SCS. These measures include those that would result in new facilities such as new EV charging stations (Measure GHG-07) and additional minor bicycle and pedestrian infrastructure, as well as policies that would update existing facilities (Measure GHG-12) and reduce single-occupancy vehicle trips by encouraging alternative transportation such as public transit, biking, and walking (Measures GHG-11 and GOV-01). Therefore, the CAP is aligned with the targets set by CARB and SACOG for GHG emissions reduction goals and includes CAP measures consistent with SACOG policy priorities. Implementation of the CAP would not conflict with the regional MTP/SCS.

CALIFORNIA GREEN BUILDING STANDARDS CODE AND SACRAMENTO COUNTY GREEN BUILDING ORDINANCE

The CAP would be consistent with the requirements of the CALGreen Code and County Green Building Ordinance, which include building energy and water efficiency improvements. The CAP would implement both new and existing building energy efficiency improvements through various CAP measures, including decarbonizing new and existing buildings, supporting increased production of renewable energy, and improving the energy efficiency of existing buildings. Through implementation of these CAP measures, the project would be consistent with—and in some instances, go beyond—the code requirements of the CALGreen Code and County’s Green Building Ordinance.

FEDERAL, STATE, AND REGIONAL REGULATIONS, PLANS, AND STANDARDS

The CAP also supports other State and regional regulations, plans, and standards that aim to further reduce GHG emissions. GHG measures to install on-site renewable energy systems (Measures GOV-01 and GOV-02) would support regulations regarding the increased use of renewables for electricity production (SB 1020). GHG measures that would reduce VMT and require EV infrastructure (Measures GHG-07, GHG-11, and GHG-12) would support programs regarding carbon neutrality goals (the County’s 2020 Climate Emergency Resolution, EO B-55-18, Advanced Clean Cars II, SB 743, and EO N-79-20). Measure GHG-14, which would increase the diversion of organic waste from both commercial and residential sources to 75 percent by 2030 and subsequently result in increased composting to support solid waste reduction, would support State regulations regarding reduction of organic waste disposal (AB 1383).

Regarding energy efficiency and electrification, Measure GHG-04 would support energy-efficient retrofits in existing buildings at the time of renovation, while Measure GOV-04 would involve adopting an electric building policy that would require all newly

constructed County buildings to include no natural gas infrastructure, and developing a decarbonization plan for County buildings and facilities by 2028. Measures that support the increased utilization and generation of renewable energy would also support the renewable energy goals of the 2030 Zero Carbon Plan, which aims to achieve the zero-carbon goal through 100 percent renewable generation by 2030.

CALIFORNIA AIR RESOURCES BOARD 2022 SCOPING PLAN, SB 32, AND AB 1279

As discussed in Chapter 2, “GHG Strategy,” of the CAP, the CAP focuses on achieving GHG emissions reduction targets for the years 2030 and 2045. The 2030 target is aligned with the 2022 Scoping Plan, which concludes that statewide GHG emission levels need to be reduced to 48 percent below 1990 levels by 2030 for the State to stay on track to achieve net zero GHG emissions no later than 2045 (as required by AB 1279). This is a steeper reduction than set forth in SB 32, which establishes a statutory limit of reducing statewide emissions to 40 percent below 1990 levels by 2030. The CAP’s 2030 target of 39 percent below 2021 levels exceeds the statewide 2030 target as codified in SB 32 and the 2022 Scoping Plan. Consequently, the CAP is more stringent than the State target, when comparing to both 1990 levels and per-capita emissions levels. The CAP’s 2030 target is derived using the 2022 Scoping Plan’s recommendation that local land use developments contribute their “fair share” of emissions reductions to the statewide GHG target for 2030. This is also consistent with the recommendation made in the Association of Environmental Professionals’ 2016 white paper for “Substantial Progress” thresholds for land use development to show consistency with statewide targets (AEP 2016).

The CAP’s 2045 target also sets the County on a trend to achieve California’s 2045 carbon neutrality target. Therefore, pursuant to CEQA Guidelines Section 15064.4(b)(3), the CAP’s 2045 target represents the level below which GHG emissions would not be cumulatively considerable through the year 2045. Finally, the CAP’s 2045 aspirational goal of carbon neutrality aligns with the statewide 2045 target of carbon neutrality stipulated in AB 1279. As discussed above in Impact GHG-1, the County is forecast to achieve these targets. Consistency with the 2022 Scoping Plan and the State’s legislative GHG emissions reduction targets is an appropriate metric by which to determine the significance of the CAP’s GHG emissions.

Appendix D of the 2022 Scoping Plan identifies three key priority areas for GHG reductions by local governments: VMT Reduction, Transportation Electrification, and Building Decarbonization. As explained further below, the CAP’s measures and actions are consistent with the reduction strategy recommendations contained in CARB’s 2022 Scoping Plan.

The VMT Reduction priority area aims at reducing fossil fuel consumption and GHG emissions from the transportation sector by promoting land use planning principles and project design features that can reduce VMT. As discussed above, the CAP includes numerous measures that would collectively reduce VMT, such as Measures GHG-08, GHG-09, GHG-11, GHG-12, and GOV-01. These measures involve increasing public transit ridership, requiring developers to contribute to regional VMT reduction through a VMT impact fee program, and improving active transportation (e.g., biking, walking)

infrastructure. Action GHG-12-e specifically commits the County to develop a Complete Streets Design Guide. Measure GHG-10 would result in revised parking standards. The CAP also includes Measure GHG-13 to advance the County's infill development programs. Additionally, the CAP does not propose land uses such as offices, residences, or industrial land uses that would increase employment or population in the region and would not induce growth-related VMT to the region. Therefore, the project would be consistent with the VMT Reduction priority strategy identified by the 2022 Scoping Plan.

The Transportation Electrification priority area aims at reducing fossil fuel consumption and GHG emissions from the transportation sector by increasing EV use. Appendix D of the 2022 Scoping Plan includes strategies for achieving success in this priority area, which are: conversion of local government fleets to ZEVs and providing EV charging at public sites, and the development of an ecosystem for ZEVs that incorporates the implementation of additional refueling infrastructure to support the transition to ZEVs. As discussed in detail above, the CAP includes numerous measures such as Measures GHG-07, GHG-13, GOV-01, and GOV-4, which would collectively increase the implementation and use of EV infrastructure. These measures involve installing additional EV chargers in new development and retrofit projects, ensuring that EV charging facilities are included in infill development, and including priority EV charging locations at County buildings and facilities. Therefore, the project would be consistent with the Transportation Electrification priority area identified by the 2022 Scoping Plan.

Regarding the Building Decarbonization priority area, the CAP includes measures such as Measures GHG-03, GHG-04, GHG-06, and GOV-04. These measures would decarbonize buildings throughout the county by supporting SMUD in the implementation of the 2030 Zero Carbon Plan, encourage and streamline the permitting of rooftop solar and battery storage projects for existing buildings, retrofitting existing residential and nonresidential buildings to improve energy efficiency and reduce natural gas use, and reducing natural gas usage in County buildings and facilities. These measures would reduce overall GHG emissions for the generation and consumption of energy during operation of buildings within the county and would be consistent with this priority area identified in the 2022 Scoping Plan.

SUMMARY

The GPU EIR acknowledges changing regulations pertaining to GHG emissions and the potential for standards to change throughout the planning horizon. Given the inherent uncertainty, the GPU EIR concludes that implementation of the General Plan would have a significant and unavoidable impact related to a conflict with regulations. The GPU EIR establishes Mitigation Measures CC-1 and CC-2, which require County adoption of the AB 32 goal as a General Plan policy, and preparation of a CAP and development thresholds. The proposed CAP implements Mitigation Measure CC-2. The CAP would be consistent with the County's overall goal to reduce GHG emissions; would be consistent with statewide targets and support a variety of other State and local plans, policies, and regulations; and would fulfill the County's obligation under Mitigation Measure CC-2 in the GPU EIR. Therefore, the proposed CAP would not conflict with any applicable plan (i.e., the 2022 Scoping Plan), policy, or regulation of an agency

adopted for the purpose of reducing GHG emissions over what was already disclosed in the GPU EIR.

The proposed CAP would align with the GHG emissions reduction targets outlined in the 2022 Scoping Plan and AB 1279, and therefore would not result in new substantial impacts related to a conflict with an applicable GHG reduction plan not disclosed in the GPU EIR. The project's contribution to impacts would not be substantial and overall impacts would change from significant and unavoidable, as identified in the GPU EIR, to ***less than significant*** because the emissions reductions achieved by the CAP would align the County with the most recent statewide GHG reduction plans.

MITIGATION MEASURES

No mitigation is required.

8 TRANSPORTATION

8.1 INTRODUCTION

This section describes the applicable federal, State, and local transportation regulations and policies; discusses the existing roadway network and transportation facilities in the vicinity of the project area; and analyzes the potential transportation impacts associated with implementation of the CAP. Because this analysis is supplemental to the certified GPU EIR, the evaluation of impacts focuses on the potential for implementation of the proposed CAP to result in new or substantially more severe impacts than presented in the GPU EIR. This section incorporates by reference the circulation element setting and impact analysis from the GPU EIR as it applies to the proposed CAP and supplements with relevant setting conditions that have changed since certification of the GPU EIR.

Comments related to transportation that were received during the notice of preparation (NOP) scoping process included requests for transit-oriented infill development, a smart growth alternative to reduce vehicle miles traveled (VMT), expansion of transit services to reduce VMT, and implementation of complete streets improvements. Because a project's effects on automobile delay no longer constitute a significant impact under CEQA, comments related to automobile delay (e.g., level of service, congestion) are not addressed herein. See Appendix A for all NOP comments received.

8.2 ENVIRONMENTAL SETTING

The existing setting described in Chapter 9, "Transportation and Circulation," (pages 9-11 through 9-13) of the GPU EIR remains applicable to the analysis and is incorporated by reference. The following discussion summarizes the information in the GPU EIR and includes supplemental existing conditions information to capture updates since the adoption of the GPU EIR or add information that was not included in the GPU EIR.

8.2.1 ROADWAY SYSTEM

County roadways are classified as freeways, thoroughfares, arterials, collectors, and local streets. A description of each as described in the County General Plan is provided below:

- **Freeways** are multilane divided highways with a minimum of two lanes for the exclusive use of traffic in each direction and full control of access without traffic interruption. Freeways provide for high-speed through-traffic movement on continuous routes. Freeways connect points within the County and link the County to other parts of the state. The following major freeways traverse the unincorporated county: Interstate 5 (I-5), Interstate 80 (I-80), State Route (SR) 99, SR-16, and U.S. Highway 50 (U.S. 50).

- **Throughfares** provide for mobility within the county, carrying through traffic on continuous routes and providing transportation links between major residential, employment, commercial, and retail areas.
- **Arterials** provide for a link between thoroughfares with their limited access and through movement capacity and collectors which have greater access and serve local streets. Arterials can also provide for mobility and direct access within commercial and retail corridors through two-way left-turn lanes.
- **Collectors** provide for mobility within communities and connect local roads to thoroughfares and arterials.
- **Local streets** provide direct access to abutting property and connect with other local roads and collectors. Local streets are typically developed as two-lane undivided roadways (County of Sacramento 2022a: 7-8).

8.2.2 TRANSIT SYSTEM

Sacramento Regional Transit (SacRT) operates over 82 bus routes (fixed-route, microtransit, and dial-a-ride), 43 miles of light rail serving 53 light rail stations, and Americans with Disability Act (ADA) paratransit services within a 440-square-mile service area throughout Sacramento County. Buses generally operate daily between the hours of 5:00 a.m. and 11:00 p.m. with headways of approximately 12 to 60 minutes depending on the route. SacRT annual ridership was approximately 23 million passengers in fiscal year 2020; however, ridership declined in 2021 and 2022 following the COVID-19 pandemic (SacRT 2022, 2024).

BICYCLE SYSTEM

The bicycle network serving the county consists of the following bicycle facility classifications (County of Sacramento 2022b: 50):

- **Shared Use Paths (Class I):** Dedicated paths for walking and bicycling completely separately from the roadway.
- **Bicycle Lanes (Class II):** Striped lanes for bicyclists. Bicycle lanes can also include striped “buffer” areas between the bicycle and travel lane or between the bicycle lane and parked cars (sometimes both).
- **Buffered Bicycle Lanes (Class IIB):** Bicycle lanes that include a striped “buffer” area either between the bicycle lane and the travel lane or between the bicycle lane and parked cars (sometimes in both locations).
- **Bicycle Routes (Class III):** Signed routes for bicyclists on low-speed, low-volume streets where roadway space is shared with motorists.
- **Bicycle Boulevard (Class IIIB):** Routes on low-speed, low-volume streets where roadway space is shared with people driving, enhanced with traffic calming features or other treatments to prioritize the comfort of people biking. Treatments will be specific to each corridor and determined based on local community input and planning and engineering judgement.

- **Separated Bikeway (Class IV):** On-street bicycle facilities with a physical barrier between the bicycle lane and motor vehicle lane(s). Barriers can include bollards, curbs, elevation, or parking. These facilities may be bidirectional or unidirectional.

As of 2022, the unincorporated County's bicycle system was comprised of approximately 304 miles of bicycle facilities including approximately 64 miles of shared-use paths, 224 miles of bicycle lanes, 2 miles of buffered bicycle lanes, and 14 miles of bicycle routes. The County's Active Transportation Plan recommends 108 miles of upgraded bicycle facilities and 1,110 miles of new dedicated bicycle corridors for a total of 1,522 miles of recommendations across unincorporated Sacramento County (County of Sacramento 2022b: 104).

PEDESTRIAN SYSTEM

Sidewalks provide dedicated space for people walking and using mobility devices to travel. The pedestrian system serving the county consists of the following sidewalk types (County of Sacramento 2022b: 39):

- **Vertical Curbs:** Curbs rise straight up to the sidewalk level and are the current standard within Sacramento County.
- **Rolled Curbs:** Curbs are sloped and can allow vehicles to encroach onto the sidewalk, providing more roadway width at the expense of pedestrian pathway conflicts.
- **Attached Sidewalks:** Connect directly to the curb and provide minimal lateral separation from the roadway.
- **Detached Sidewalks:** Separated from the curb with a buffer area, typically a planting strip or special paving material to provide greater separation from the roadway.

There are approximately 1,100 miles of roads located in the unincorporated county. As of 2022, 13 percent of those 1,100 miles of roadway had sidewalks on both sides of the street, 21 percent of streets had sidewalks on one side of the street, and 66 percent of streets had no sidewalks (County of Sacramento 2022b: 40).

8.3 REGULATORY SETTING

The regulatory setting described on pages 9-14 through 9-16 of the GPU EIR is incorporated by reference. Applicable federal, State, and local regulations that have seen changes or updates since the adoption of the GPU EIR or those that were not included in the GPU EIR are described below.

8.3.1 FEDERAL

There are no new federal laws or regulations addressing transportation that are relevant to the project.

8.3.2 STATE

CALIFORNIA DEPARTMENT OF TRANSPORTATION

The California Department of Transportation (Caltrans) is the State agency responsible for the design, construction, maintenance, and operation of the California State Highway System, as well as the segments of the Interstate Highway System that are located within California. Caltrans District 3 is responsible for the operation and maintenance of highways in the county. Caltrans requires a transportation permit for any transport of heavy construction equipment or materials that necessitates the use of oversized vehicles on State highways and an encroachment permit for any work within Caltrans right-of-way.

CALIFORNIA FIRE CODE

The 2022 California Fire Code, which is codified as Part 9 of the Title 24 of the California Code of Regulations (CCR), incorporates by adoption the 2021 International Fire Code and contains regulations related to construction, maintenance, access, and use of buildings. Topics addressed in the California Fire Code include design standards for fire apparatus access (e.g., turning radii, minimum widths), standards for emergency access during construction, provisions intended to protect and assist fire responders, and several other general and specialized fire-safety requirements for new and existing buildings and the surrounding premises. The California Fire Code contains specialized technical regulations related to fire and life safety. The California Building Standards Code, including the California Fire Code, is revised and published every 3 years by the California Building Standards Commission. Sacramento County has adopted the 2022 California Fire Code by reference in Section 17.04.010 of the Sacramento County Code of Ordinances (County Code).

CALIFORNIA CODE OF REGULATIONS, SECTION 15064.3

On December 28, 2018, CEQA Guidelines Section 15064.3 was introduced to address the determination of significance for transportation impacts. This amendment mandates that transportation analyses be based on VMT rather than congestion metrics such as level of service (LOS). The shift in focus was a direct response to legislation, notably Senate Bill (SB) 743, passed in 2013, that required the Governor’s Office of Planning and Research (OPR) to develop new CEQA guidelines that address traffic metrics under CEQA. As stated in the legislation, upon adoption of the new guidelines, “automobile delay, as described solely by level of service (LOS) or similar measures of vehicular capacity or traffic congestion shall not be considered a significant impact on the environment pursuant to this division, except in locations specifically identified in the guidelines, if any.”

Following approval by the Office of Administrative Law, the updated CEQA Guidelines took effect statewide on July 1, 2020, implementing the provisions outlined in CCR Section 15064.3. As a result, VMT analysis has become a crucial component of project evaluations under CEQA. Therefore, VMT is considered in the analysis of this project.

In December of 2018, OPR published the most recent version of the *Technical Advisory on Evaluating Transportation Impacts in CEQA* (Technical Advisory), which provides guidance for VMT analysis. The 2018 Technical Advisory provides guidance related to screening thresholds for small projects indicating that projects that generate or attract fewer than 110 trips per day generally may be presumed to result in a less-than-significant VMT impact, absent substantial evidence indicating otherwise (OPR 2018). The Sacramento County Department of Transportation's (SacDOT's) Transportation Analysis Guidelines (TAG) are based on OPR's Technical Advisory, but refinements and clarifications have been added to reflect local conditions (County of Sacramento 2020). See below for a description of the TAG.

8.3.3 REGIONAL

SACRAMENTO AREA COUNCIL OF GOVERNMENTS

The Sacramento Area Council of Governments (SACOG) is an association that includes the Counties of El Dorado, Placer, Sacramento, Sutter, Yolo, and Yuba. As a metropolitan transportation organization, SACOG is required to prepare a long-range transportation plan, known as the metropolitan transportation plan and sustainable communities strategy (MTP/SCS), for Sacramento, Sutter, Yolo, and Yuba Counties every 4 years. While Placer and El Dorado counties manage their State-level transportation plans through their Regional Transportation Planning Agencies, SACOG coordinates closely with the Placer County Transportation Planning Agency and the El Dorado County Transportation Commission. In addition to preparing the region's long-range transportation plan, SACOG assists in planning for transit, bicycle networks, clean air, and airport land uses.

METROPOLITAN TRANSPORTATION PLAN/SUSTAINABLE COMMUNITIES STRATEGY

SACOG is responsible for preparing and updating the MTP/SCS and the corresponding Metropolitan Transportation Improvement Program (MTIP) for the Sacramento region. The purpose of the MTP/SCS is to establish regional access and identify mobility goals; identify present and future transportation needs, deficiencies, and constraints within the transportation system; analyze potential solutions; develop strategies to achieve State-established VMT goals for the region; estimate available funding; and propose investments. On November 18, 2019, the SACOG Board of Directors adopted the 2020 update to the MTP/SCS. The next update to the MTP/SCS is scheduled for adoption in 2025.

The MTIP is a short-term listing of surface transportation projects that receive federal funds, are subject to a federally required action, or are regionally significant. SACOG adopted the 2023-2026 MTIP in September 2022 covering four federal fiscal years of programming. The project listing in the MTIP provides a detailed description for each individual project in the 2023-2026 MTIP, including those in the unincorporated county.

REGIONAL ACTIVE TRANSPORTATION PROGRAM

The Regional Active Transportation Program identifies projects and programs that are consistent with the vision of the MTP/SCS. The 2023 Regional Active Transportation

Program Policy Framework identifies the process for distributing over 17 million dollars of active transportation funds (SACOG 2023).

SACRAMENTO REGION TRAIL NETWORK ACTION PLAN

The *Sacramento Region Trail Network Action Plan* was adopted by SACOG in July 2022 (SACOG 2022). It establishes a vision for walking, biking, and rolling throughout the region by planning for a network of trails that reaches key destinations and closes existing gaps. The Sacramento Region Trail Network Action Plan establishes the baseline environmental setting, identifies a proposed network of facilities, and sets forth goals for the trail network.

SACRAMENTO REGIONAL TRANSIT DISTRICT DESIGN GUIDELINES FOR BUS AND LIGHT RAIL FACILITIES

The SacRT Design Guidelines for Bus and Light Rail Facilities assist SacRT in providing consistent, high-quality facilities that encourage public transit operation. The guidelines provide a general framework for project development and design to promote convenient, comfortable, and safe bus and light rail facilities for transit users (SacRT 2023).

8.3.4 LOCAL

SACRAMENTO COUNTY 2030 GENERAL PLAN

The Circulation Element of the Sacramento County General Plan provides the framework for County decisions concerning the countywide transportation system, which includes various transportation modes and related facilities (County of Sacramento 2022a). The Circulation Element identifies measures to establish and support an integrated and balanced multi-modal transportation system. The Circulation Element of the Sacramento County General Plan was amended on October 6, 2020, to establish VMT as the threshold of significance for transportation impacts in CEQA analyses (General Plan Policy CI-5; Table CI-1 presented as Table 8-1 below). The following General Plan policies are applicable to the project:

- CI-1.** Provide complete streets to provide safe and efficient access to a diversity of travel modes for all urban, suburban and rural land uses within Sacramento County except within certain established neighborhoods where particular amenities (such as sidewalks) are not desired. Within rural areas of the County, a complete street may be accommodated through roadway shoulders of sufficient width or other means to accommodate all modes of travel.
- CI-2.** Promote continued mobility for individuals whose access to automobile transportation is limited by age, illness, income, desire, or disability.
- CI-3.** Travel modes shall be interconnected to form an integrated, coordinated, and balanced multi-modal transportation system, planned and developed consistent with the land uses to be served.

- CI-4.** Provide multiple transportation choices to link housing, recreational, employment, commercial, educational, and social services.
- CI-5.** Land use and transportation planning and development should be cohesive, mutually supportive, and complement the objective of reducing per capita vehicle miles travelled (VMT). The standards shown in Table CI-1 (presented as Table 8-1, below) shall be used as thresholds of significance for all projects subject to CEQA. Where the VMT level standards of Table CI-1 (presented as Table 8-1, below), are predicted to be exceeded, all feasible mitigation measures shall be included to reduce projected VMT levels.

Table 8-1: Significance Thresholds for CEQA Transportation Analysis for Development Projects

Project Type¹	VMT Significance Criteria
Residential	Project VMT per capita exceeds 85 percent of the regional average VMT per capita
Office/Business Professional	Project VMT per employee exceeds 85 percent of the regional average VMT per employee
Industrial	Project VMT per employee exceeds the regional average VMT per employee
Regional Retail	Net increase in regional VMT
Regional Public Facilities/Services	Net increase in regional VMT
Redevelopment	Projects that result in a decrease to existing regional total VMT are presumed to have a less-than-significant VMT impact; otherwise, apply the relevant threshold based on the proposed land use (treating existing use as vacant)
Mixed Use	Apply the relevant threshold to each land use component individually
Phased	Apply the relevant threshold to each phase independently
Land Development with Roadway Component	For locally-serving roadways, the significance determination is based on the land use component. For regional roadways, apply thresholds of significance for transportation projects.

¹ As defined in the Sacramento County Transportation Analysis Guidelines, Appendix A.

- CI-6.** Provide support for community-based corridor planning processes on existing roadways with excess vehicle capacity within built communities to optimize the public right-of-way by utilizing the excess width for other modes of travel or public amenities such as bike lanes, landscaping, walkways, parking, or medians.
- CI-8.** Maintain and rehabilitate the roadway system to maximize safety, mobility, and cost efficiency.
- CI-10.** Land development projects shall be responsible to provide improvements which address the project's adverse effects on local and regional roadways.

- CI-12.** To preserve public safety and local quality of life on collector and local roadways, land development projects shall incorporate appropriate treatments of the Neighborhood Traffic Management Program.
- CI-13** Collaborate with regional transportation planning agencies and neighboring jurisdictions to provide cross jurisdictional mobility.
- CI-17** Ensure that transportation infrastructure improvement projects initiated by the County include a comprehensive public outreach process and involves affected local stakeholders and communities in the beginning and throughout the planning and development process for the project.
- CI-19** Collaborate with transit service providers to provide transit services within the County that are responsive to existing and future transit demand.
- CI-20** Promote transit services in appropriate commercial corridors and where population and employment densities are sufficient or could be increased to support those transit services.
- CI-22** Collaborate with the Sacramento Area Council of Governments and transit service providers to pursue all available sources of funding for transit services when consistent with General Plan policies and long-term funding capabilities.
- CI-23** Consider the transit needs of senior, disabled, low-income, and transit-dependent persons in making recommendations regarding transit services.
- CI-24** Collaborate with transit service providers for the development of facilities that provide for efficient links and interconnectivity with different transportation modes, including bicyclists and pedestrians.
- CI-25** The County shall develop right-of-way acquisition guidelines for the implementation of transit services shown on the Transportation Plan.
- CI-26** Consider the expansion of Neighborhood Shuttle services in unincorporated area communities.
- CI-28** Collaborate with local transit service providers in obtaining all available sources of funding for the development, improvement, and maintenance of the transit system.
- CI-29** The County shall work with transit service providers to establish and implement development guidelines to maximize the ability of new development and redevelopment to support planned transit services. New development and redevelopment shall have an orientation to travel patterns that are conducive to transit service. This will include concentration of development in centers and along linear corridors such that trip origins and destinations are concentrated near transit services.

- CI-30** The County shall collaborate with transit service providers to promote the phased implementation of transit services to all growth areas as development occurs.
- CI-32** Develop a comprehensive, safe, convenient and accessible bicycle and pedestrian system that serves and connects the County's employment, commercial, recreational, educational, social services, housing and other transportation modes.
- CI-33** Adopt, implement and periodically update the Sacramento County Active Transportation Plan for unincorporated Sacramento County that sets forth the goals, policies, guidelines, programs and improvements necessary to accomplish the goals of this section.
- CI-34** Construct and maintain bikeways and multi-use trails to minimize conflicts between bicyclists, pedestrians, and motorists.
- CI-35** The applicant/developer of land development projects shall be responsible to install bicycle and pedestrian facilities in accordance with Sacramento County Improvement Standards and may be responsible to participate in the fair share funding of regional multi-use trails identified in the Sacramento County Active Transportation Plan.
- CI-36** Collaborate with neighboring jurisdictions and regional agencies to coordinate planning and development of the County's bikeways, pedestrian facilities and multiuse trails with those of neighboring jurisdictions, and to support a regional bicycle and pedestrian network.
- CI-37** Pursue all available sources of funding for the development, improvement, and maintenance of bikeways, pedestrian facilities and multi-use trails, and to support bicycle and pedestrian safety, education, encouragement and enforcement programs.
- CI-38** Design and construct pedestrian facilities to ensure that such facilities are accessible to all users.
- CI-40** Whenever possible, the applicant/developer of new and infill development projects shall be conditioned to fund, implement, operate and/or participate in TSM programs to manage travel demand associated with the project.
- CI-41** Consider TSM programs that increase the average occupancy of vehicles and divert automobile commute trips to transit, walking, and bicycling.
- CI-42** Collaborate with other agencies to develop measures to provide for more efficient traffic flow, reduce vehicular travel demand and meet air quality goals.
- CI-43** The County shall promote transit-supportive programs in new development, including employer-based trip-reduction programs (employer incentives to use

transit or nonmotorized modes), “guaranteed ride home” for commute trips, and car-share or bikeshare programs.

- SA-23** The County shall require that all new development meets the local fire district standards for adequate water supply and pressure, fire hydrants, and access to structures by firefighting equipment and personnel.

SACRAMENTO COUNTY CODE, SECTION 17.04.010

Section 17.04.010 of the County Code adopts the 2022 California Fire Code of Regulations (Title 24, Part 9) by reference. See above for a detailed description of the California Fire Code.

SACRAMENTO COUNTY ACTIVE TRANSPORTATION PLAN

The 2022 Active Transportation Plan for unincorporated county is the guiding document for achieving the County’s goal to build a balanced transportation system that supports and encourages active modes of travel. The Active Transportation Plan analyzes existing conditions and provides policy, program, and infrastructure recommendations to improve active transportation within the unincorporated county (County of Sacramento 2022b). The 2022 Active Transportation Plan replaced the *Sacramento County Bicycle Master Plan (2017)* and the *Sacramento County Bicycle Master Plan (2011)*. Therefore, they are not mentioned herein.

SACRAMENTO COUNTY IMPROVEMENT STANDARDS

The Sacramento County Improvement Standards (Improvement Standards) regulate the design and preparation of plans for facilities constructed within public rights of ways. Chapter 4 of the Improvement Standards includes standards and requirements regarding roadways, sidewalks, bicycle lanes, and street trees (County of Sacramento 2018).

SACRAMENTO COUNTYWIDE DESIGN GUIDELINES

The Countywide Design Guidelines apply to the unincorporated county and include design strategies that support the County in creating a built environment that is healthy, sustainable, livable, and promotes active transportation choices (County of Sacramento 2022c).

TRANSPORTATION ANALYSIS GUIDELINES

The SacDOT TAG was adopted by the County Board of Supervisors in October 2020. The TAG outlines screening criteria by which projects may be exempt from VMT analysis and provides methodologies to analyze a project’s VMT if screening criteria are not met (County of Sacramento 2020). As detailed above, a project’s effect on automobile delay is no longer a consideration when identifying a significant impact under CEQA; thus, the portions of the TAG not directly applicable to CEQA are not included here. The TAG also includes guidelines and requirements for multimodal (bicycle, pedestrian, and transit) transportation analysis, hazards related to design, on-site circulation, and construction.

COUNTY OF SACRAMENTO ENCROACHMENT AND TRAFFIC CONTROL PLANS

Encroachment permits are needed for all construction work performed within the County right of way. Encroachment permit applications are reviewed to identify potential conflicts with underground drainage, water supply, and sewer facilities, as well as conflicts with roadway and other miscellaneous transportation related facilities. The County Right of Way Management Section acts as the lead agency and is responsible for the coordination and management of the review process. The County Construction Management and Inspection Division is responsible for all inspection related activities associated with encroachment permit work and typically coordinates their efforts with the County Right of Way Management Section.

Additionally, Traffic Control Plans (TCP) and/or Detour Plans are reviewed and managed by the County Right of Way Management Section and are required for all construction work within the road right of way that modifies vehicular, bicycle and/or pedestrian traffic patterns and are necessary to ensure the safe and efficient movement of traffic through construction work zones.

8.4 SIGNIFICANCE CRITERIA AND METHODOLOGY

8.4.1 SIGNIFICANCE CRITERIA

Thresholds of significance are based on Appendix G of the CEQA Statute and Guidelines, CEQA Guidelines Section 15064.3, the Sacramento County General Plan, and the County TAG. Transportation impacts would be significant if the project would:

- eliminate or adversely affect an existing bikeway or pedestrian facility in a way that would discourage its use;
- interfere with the implementation of a planned bikeway as shown in the County Active Transportation Plan or be in conflict with the County Active Transportation Plan;
- result in unsafe conditions for bicyclists or pedestrians.
- adversely affect public transit operations;
- fail to adequately provide access to transit;
- conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b);
- substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment); or
- result in inadequate emergency access.

8.4.2 METHODOLOGY

The CAP is a policy document and does not propose any specific future projects. As described in Chapter 1, "Introduction," this SEIR considers the broad environmental implications of implementing the CAP on a conceptual basis and does not provide a

project-level assessment. Impacts related to transportation were analyzed qualitatively based on a review of the proposed CAP greenhouse gas (GHG) emissions reduction measures and actions and their potential to result in physical changes to the environment if the proposed CAP is approved and implemented. Each issue area was analyzed in the context of existing laws and regulations, as well as policies adopted in the General Plan, and the extent to which these existing regulations and policies adequately address and minimize the potential for impacts associated with implementation of the proposed CAP. The impact analysis also focuses on whether approval and implementation of the CAP would result in new or more severe transportation impacts than disclosed in the GPU EIR. Because this SEIR tiers from the GPU EIR, all relevant GPU EIR mitigation measures have been considered applicable to CAP implementation, as needed to avoid or minimize project impacts. Because future projects that would be implemented under the CAP have yet to be specifically defined, this SEIR considers the types of impacts that could occur with implementation of proposed CAP GHG reduction measures and actions. Future projects would be evaluated by the County to determine if they are within the scope of this SEIR or if they result in project-specific impacts additional to what is concluded in this analysis. If future projects would result in additional impacts, subsequent CEQA documentation would be required to evaluate the impacts, determine mitigation, and conclude whether impacts are reduced to a less-than-significant level.

8.5 IMPACTS AND ANALYSIS

8.5.1 IMPACT TRAN-1: ELIMINATE OR ADVERSELY AFFECT BICYCLE, PEDESTRIAN, AND TRANSIT FACILITIES

GENERAL PLAN UPDATE EIR DETERMINATION

BICYCLE AND PEDESTRIAN FACILITIES

Impacts related to bicycle and pedestrian facilities can be found in Chapter 9, “Transportation and Circulation,” on page 9-60 of the GPU EIR. The GPU EIR concluded that development in new growth areas consistent with the smart growth principles would result in adequate bicycle and pedestrian mobility. Additionally, the County’s plans to improve bicycle and pedestrian facilities on existing and planned roadways would provide important connectivity. Further, the provision of appropriate bicycle and pedestrian facilities integrated throughout the unincorporated county, particularly in new growth areas, that would be initiated by implementation of the General Plan was anticipated to assist in a mode shift to alternative forms of transportation. Therefore, the GPU EIR concluded that impacts to bicycle and pedestrian facilities would be ***less than significant***.

TRANSIT FACILITIES

The discussion of impacts and mitigation measures related to transit can be found in Chapter 9, “Transportation and Circulation,” on pages 9-61 through 9-62 of the GPU EIR. The GPU EIR concluded that growth would result in increased population and

employment, which would increase the demand for transit services, increase service frequency, and extend transit routes to accommodate new development. Additional buses and light rail vehicles would be needed to maintain existing headways as well as additional transit stations, stops, and park-and-ride lots to facilitate existing and future transit routes. Due to uncertainties with funding, the GPU EIR determined that it may not be possible to provide adequate transit services, resulting in less transit service than necessary to support development under the General Plan and/or delays in transit service. Therefore, despite the intent of the General Plan to provide an adequate level of transit services in accordance with smart growth principles, the GPU EIR determined that it may not be possible to provide adequate transit services in a timely fashion due to future funding uncertainties. Impacts related to transit were determined to be ***significant and unavoidable***.

PROPOSED CLIMATE ACTION PLAN IMPACT ANALYSIS

BICYCLE AND PEDESTRIAN FACILITIES

The projects that would be implemented to further the goals of the CAP would not physically disrupt any existing bicycle or pedestrian facilities. Construction activities associated with the CAP would be localized and temporary. Although construction of infrastructure facilities and associated off-site improvements associated with the CAP could occur within the roadway or along pedestrian and bicycle facilities potentially resulting in lane closures, minor detours, and/or delays due to the movement of construction vehicles and equipment, all projects within County right-of-way would be required to obtain an encroachment permit which includes the preparation of a TCP for any construction work which would modify vehicular, bicycle, and/or pedestrian traffic patterns (County of Sacramento 2024b) to maintain a safe environment for all modes of transportation.

Further, the projects that would be implemented to advance the goals of the CAP would not physically disrupt any existing bicycle or pedestrian facilities, nor adversely affect planned bicycle or pedestrian facilities identified in the County's Active Transportation Plan. Rather, several CAP measures would enhance the environment for pedestrians and bicyclists by expanding facilities for alternative modes of transportation, encouraging use, and increasing safety. Specifically, CAP Measure GHG-12 would improve active transportation infrastructure by implementing priority projects from the Active Transportation Plan, including 66 pedestrian spot improvements, 51 miles of sidewalk gap closures, and 190 miles of bicycle projects by 2030. All projects would be required to meet County design standards and would be subject to review by County staff to ensure all applicable regulations are met.

Implementation of CAP measures and actions would be designed to support pedestrian and bicycle network improvements, as well as be consistent with the County General Plan. For example, General Plan Policy CI-1 encourages the construction of complete streets, Policy CI-2 promotes mobility for individuals with limited access to automobile transportation, Policy CI-3 calls for an interconnected multi-modal transportation system, Policy CI-4 aims to provide multiple transportation choices to link key destinations, and Policies CI-32 through CI-38 are intended to develop a safe,

comprehensive, and accessible bicycle and pedestrian system. Further, CAP Measure GOV-1, specific to County operations, would be implemented to incentivize County staff to increasingly use alternative transportation. Therefore, potential impacts to bicycle and pedestrian facilities would be beneficial through implementation of CAP measures and actions, applicable General Plan policies, and completion of subsequent project-level planning and environmental review.

The CAP would not conflict with applicable programs, plans, ordinances, or policies addressing bicycle and pedestrian facilities and would result in benefits to pedestrian and bicycle facilities within the unincorporated County. Therefore, there would be no new or substantially more severe impacts related to bicycle or pedestrian facilities as compared to those identified in the GPU EIR.

TRANSIT FACILITIES

As described above, construction activities associated with implementation of the CAP would be localized and temporary. Although construction of infrastructure facilities and associated off-site improvements could occur within the roadway, potentially resulting in lane closures, minor detours, and/or delays due to the movement of construction vehicles and equipment, all projects within County right-of-way would be required to obtain an encroachment permit which includes the preparation of a TCP for any construction work that would modify vehicular, bicycle, and/or pedestrian traffic patterns (County of Sacramento 2024b) to maintain a safe environment for all modes of transportation, including transit users. All projects that could result in physical impacts would be required to meet County design standards and would be subject to review by County staff to ensure all applicable regulations are met such as those included in the County Improvement Standards and the *SacRT Design Guidelines for Bus and Light Rail Facilities*.

Several CAP actions would enhance the environment for transit users by expanding transit facilities and supporting increased transit use through Measure GHG-11 and Actions GHG-11-a through GHG-11-j. Additionally, CAP Measure GOV-01 and related Actions GOV-01-01-h and GOV-01-01-j would encourage and incentivize County employees to increase transit ridership.

The CAP would complement General Plan Policies CI-1 through CI-4, which establish the importance of an interconnected multimodal transportation system for all users. In addition, General Plan Policies CI-17 through CI-30 specifically aim to increase transit access through stakeholder coordination, seeking funding opportunities, and facility expansion.

Although the GPU EIR determined the impact to transit significant and unavoidable, OPR's Technical Advisory, published subsequent to the GPU EIR's certification, states "When evaluating impacts to multimodal transportation networks, lead agencies generally should not treat the addition of new transit users as an adverse impact" (OPR 2018: 19). Implementation of the CAP would not increase development potential beyond what was accounted for in the GPU EIR analysis. Therefore, although the CAP intends

to increase transit ridership as a means to reduce GHG emissions, the impact is considered beneficial.

For these reasons, the CAP would not conflict with applicable programs, plans, ordinances, or policies addressing transit facilities and service and would result in benefits to transit users within the unincorporated county. Therefore, there would be no new or substantially more severe impacts related to transit facilities as compared to those identified in the GPU EIR.

SUMMARY

As detailed above, subsequent projects implemented under the CAP would be consistent with the General Plan and Active Transportation Plan. Additionally, subsequent development projects under the CAP would be subject to all applicable County guidelines, standards, and specifications related to transit, bicycle, and pedestrian facilities. Further, several CAP measures and actions would enhance the availability, efficiency, and safety of alternative transportation facilities while increasing the comfort of users. Also, based on OPR guidance, the addition of new transit users is not considered an adverse impact. Therefore, implementation of the CAP would not result in a new or more severe impact related to bicycle, pedestrian, or transit facilities than identified in the GPU EIR. The CAP's contribution to impacts would not be substantial and overall impacts would remain ***significant and unavoidable***, as identified in the GPU EIR.

MITIGATION MEASURES

No further mitigation is required.

8.5.2 IMPACT TRAN-2: CONFLICT OR BE INCONSISTENT WITH CEQA GUIDELINES SECTION 15064.3, SUBDIVISION (B), RELATED TO VEHICLE MILES TRAVELED

GENERAL PLAN UPDATE EIR DETERMINATION

Section 15064.3 of the CEQA Guidelines was adopted in December 2018, providing that VMT is the “most appropriate measure of transportation impacts.” Mandated analysis of VMT impacts became effective July 1, 2020. Therefore, the GPU EIR did not evaluate impacts to VMT. However, VMT was a known metric at the time the GPU EIR was prepared but its use was generally limited to highway cost allocation, determining user fee structures, and estimating air quality and GHG emissions. For the purpose of estimating GHG emissions from General Plan implementation without the CAP, the CAP modeling forecasts that total annual VMT in the county will be approximately 4.6 billion in 2026, 4.8 billion in 2030, and 6.0 billion in 2045.

PROPOSED CLIMATE ACTION PLAN IMPACT ANALYSIS

Implementation of measures and actions associated with the CAP would not induce substantial population or employment growth and, therefore, would not generate substantial long-term increases in VMT. Construction of projects necessary to

implement CAP measures and actions would include installation of EV chargers or hydrogen-fueling infrastructure (Action GHG-07-a, Action GHG-07-b, Action GHG-07-c, Action GHG-07-d, Action GHG-07-e, Action GHG-07-f, Action GHG-07-h, and Action GOV-03-b); construction of roadways, bikeways, and pedestrian improvements (Measure GHG-11-f); construction and operation of composting facilities (Action GHG-14-a and Action GHG-14-b); installation of solar PV and battery storage (Action GOV-04-a and Action GOV-04-b); and removal of existing and installation of new landscaping (Measure GOV-05-d and Action GOV-05-e). These types of small construction projects would not generate substantial automobile trips, and most construction trips would be truck trips that are not included in the CEQA Guideline definition of VMT. Additionally, if new or expanded roadways are required to implement Action GHG-11-g and provide or improve access to transit stations, these roadways would target improvements within 0.5-mile of a transit station to improve multimodal connections, rather than expand capacity of the road network in a manner that increases VMT.

The new or modified roadway projects would be consistent with adopted General Plan goals and policies related to alternative transportation. For example, General Plan Policy CI-1 encourages the construction of complete streets, Policy CI-2 promotes mobility for individuals with limited access to automobile transportation, Policy CI-3 calls for an interconnected multi-modal transportation system, Policy CI-4 aims to provide multiple transportation choices to link key destinations, and Policies CI-32 through CI-38 intend to develop a safe, comprehensive, and accessible bicycle and pedestrian system. In addition, General Plan Policies CI-1 through CI-4 state the importance of an interconnected multimodal transportation system for all users and General Plan Policies CI-17 through CI-30 specifically aim to increase transit access through stakeholder coordination, seeking funding opportunities, and facility expansion.

Implementation of the CAP would involve policies and programs to increase the use of alternative forms of transportation as well as reduce VMT in the unincorporated county. CAP Measures GHG-08, GHG-09, GHG-10, GHG-12, GHG-13, and GOV-01 could result in expanded transit and bicycle and pedestrian facilities, the implementation of transportation demand management programs to reduce the use of single occupancy vehicles, the revision of parking standards, the advancement of infill development in priority areas, and initiatives to encourage increased alternative transportation and transit use in the unincorporated county. The benefits these measures and actions would provide to alternative transportation would result in decreased vehicular use and, thus, reduced VMT.

The GHG emission reductions estimated for each of the proposed CAP measures and actions are based, in part, on VMT reductions associated with the implementation of CAP measures. Through Measure GHG-09, the County would include more rigorous VMT reduction targets in the Transportation System Management (TSM) plans than are already required in the County's zoning code to promote sustainable transportation practices, reduce on-road transportation emissions, and contribute to long-term environmental sustainability in the unincorporated county from all new developments. Table 8-2 shows the potential reductions associated with implementation of CAP Measure GHG-09 over time. The VMT reduction calculations for Measure GHG-09

assume a 15 percent reduction in annual VMT from all new development that occurs after 2026.

Table 8-2: Vehicle Miles Traveled Reductions Due to Implementation of CAP Measure GHG-09

Item	2030	2045
Total New VMT in Unincorporated Sacramento County Added After 2026	300,383,164	1,426,820,027
15 percent reduction in annual VMT Due to Implementation of CAP Measure GHG-09	45,057,475	214,023,004

Notes: VMT = vehicle miles traveled.

Source: Prepared by Ascent Environmental in 2024.

Additionally, CAP Measure GHG-10 would revise parking standards for new developments to reduce housing costs in transit priority areas and reduce VMT. The unbundling of parking proposed by Measure GHG-10 assumes that 73,436,935 VMT per year from new growth would be eligible for VMT reduction, based on proximity to transit. Of that, it is anticipated that 1,380,823 VMT would be reduced annually due to the implementation of parking unbundling after applying a percent reduction in VMT based on factors that include parking cost, vehicle cost, and vehicle ownership.

In addition to Measures GHG-09 and GHG-10, Measures GHG-11 and GHG-12 would result in quantifiable reductions in community VMT emissions. Measures GHG-08 and GHG-13 would also support VMT reduction, but the amount of reduction attributable to these measures is not quantifiable and GHG reductions from VMT reductions are not assumed for these measures. In addition, VMT generated by County government operations would be reduced through Measure GOV-01. Table 8-3 summarizes the quantified GHG reductions from the CAP. Through these measures, the CAP would reduce total VMT in the unincorporated county by 1 percent compared to ABAU in 2030 and 5 percent in 2045. See CAP Appendix E for details about the quantification approach and reduction estimates.

Table 8-3: Summary of VMT Reductions from all CAP Measures

Community VMT Calculations	2021	2030	2045
Community ABAU VMT (no measures reductions applied)	4,204,952,246	4,880,814,364	6,007,251,228
Reductions From GHG-09: VMT Reduction in Qualified Projects	0	45,057,475	214,023,004
Reductions From GHG-10: Revised Parking Standards	0	1,380,823	1,380,823
Reductions From GHG-11: Increase Transit Ridership	0	1,597,669	3,655,102
Reductions From GHG-12: Active Transportation Plan Implementation	0	12,562,699	99,527,439

Community VMT Calculations	2021	2030	2045
Total Reductions	0	60,598,665	318,586,369
ABAU VMT (after measure reductions)	4,204,952,246	4,820,215,699	5,688,664,859
Percent Reduction Relative to ABAU		1%	5%
Government Employee VMT Calculations	2021	2030	2045
ABAU VMT (no measures reductions applied)	81,877,233	95,037,363	116,970,914
Reductions from GOV-01: Reduce Fossil-Fueled Employee Commute VMT	0	3,801,495	4,678,837
Total reductions	0	3,801,495	4,678,837
ABAU VMT (after measure reductions)	81,877,233	91,235,869	112,292,078
Percent Reduction Relative to ABAU	0%	4%	4%

Source: Prepared by Ascent Environmental in 2024.

Therefore, implementation of CAP measures and actions would reduce VMT in the unincorporated county by expanding transit service and bicycle and pedestrian facilities, unbundling parking, accelerating infill development, and implementing transportation demand management programs and educational initiatives to encourage increased alternative transportation use in the unincorporated county. Thus, implementation of the CAP would not result in a new VMT impact not disclosed in the GPU EIR. Impacts related to VMT would be *less than significant*.

MITIGATION MEASURES

No mitigation is required.

8.5.3 IMPACT TRAN-3: SUBSTANTIALLY INCREASE HAZARDS DUE TO A DESIGN FEATURE OR INCOMPATIBLE USES

GENERAL PLAN UPDATE EIR DETERMINATION

The discussion of impacts related to safety can be found in Chapter 9, "Transportation and Circulation," on pages 9-60 through 9-61 of the GPU EIR. The GPU EIR evaluated the impacts to safety and found that the General Plan incorporated policies related to transportation facility planning, design, and implementation in accordance with accepted design standards and guidelines. Therefore, the GPU EIR determined that the impact to safety would be *less than significant*.

PROPOSED CLIMATE ACTION PLAN IMPACT ANALYSIS

Several CAP measures and associated actions could result in new or modified transportation infrastructure with the potential to create hazardous design features. Specifically, Measure GHG-11 to partner with regional transportation agencies to

increase transit ridership and supporting actions could result in construction of roadways, bikeways, and pedestrian improvements. The improvements that this measure would support, such as connections to transit stations (Action GHG-11-g), would provide enhanced multimodal facilities. Dedicated and well-planned circulation around transit stations would improve safety and limit the potential for hazards. In addition, Measure GHG-12 and supporting actions would implement the priority projects identified in the 2022 Active Transportation Plan and include development of a Complete Streets Design Guide (Action GHG-12-e). This updated guidance would reflect all current regulations and best practices in the County's guidance materials, which would be expected to improve the safety features in futures active transportation projects. These measures would have beneficial effects related to the potential for transportation conflicts and hazards.

Individual projects that could result in temporary construction near roadways would be required to follow all local protocols to ensure safety and minimize transportation disturbance during construction activities, including the requirement to obtain an encroachment permit and develop a TCP for any work on a County-maintained roadway or in the County right-of-way. Each TCP would comply with the most recent CA MUTCD standards and be reviewed by the SacDOT Right of Way Management Section. A transportation permit would be required for the use of any vehicle and/or load exceeds dimensions established in Section 35780 of the California Vehicle Code and would be reviewed by the Sacramento County Department of County Engineering (County of Sacramento 2024a). Additionally, future discretionary projects would be subject to review by County staff to ensure hazards during construction are minimized and that all safety standards are met.

Once constructed, these projects would not exacerbate inadequate road widths, or construct new roadways with sharp curves or inadequate sight distances. All projects would be required to meet County Improvement Standards and would be subject to review by County staff to ensure all applicable regulations are met. Therefore, implementation of these projects would not result in increased design hazards across the county's roadway network during operations.

Potential impacts to transportation hazards would remain less than significant through compliance with existing federal, State, and local requirements that regulate construction activities and design standards. For these reasons, there would be no new or substantially more severe impacts from hazardous design features or incompatible uses as compared to those identified in the GPU EIR. The impact would remain ***less than significant***.

MITIGATION MEASURES

No mitigation is required.

8.5.4 IMPACT TRAN-4: RESULT IN INADEQUATE EMERGENCY ACCESS

GENERAL PLAN UPDATE EIR DETERMINATION

The discussion of impacts related to safety can be found in Chapter 9, “Transportation and Circulation,” on pages 9-60 through 9-61 of the GPU EIR. The GPU EIR evaluated the impacts to safety and concluded that the General Plan incorporates policies related to transportation facility planning, design, and implementation in accordance with accepted design standards and guidelines. Therefore, the GPU EIR concluded that impacts to emergency access and safety would be *less than significant*.

PROPOSED CLIMATE ACTION PLAN IMPACT ANALYSIS

The effects of construction of projects required to implement the CAP would be localized and temporary; however, during construction of each project, traffic operations could be degraded in a manner that affects emergency vehicle access. All subsequent projects would follow all local protocols to ensure safety and minimize traffic disturbance during construction activities including the requirement to obtain an encroachment permit and development of a TCP for any work on a County-maintained roadway or in the County right-of-way. Implementation of the CAP would also be required to be consistent with General Plan Policy SA-23, which requires new development to provide unobstructed emergency access to structures by firefighting equipment and personnel. Additionally, future discretionary projects would be subject to review by County and emergency service staff to ensure emergency access is maintained.

Section 12-3.03 of the County Standard Construction Specifications requires that a project contractor provide for the uninterrupted passage of emergency vehicles through or around a work area. California Fire Code of Regulations (Title 24, Part 9), adopted by reference in Sacramento County Code Section 17.04.010, requires the width of an unobstructed roadway to measure no less than 24 feet to provide adequate access for emergency responders. The County also requires coordination of all projects with Sacramento Metro Fire District and all applicable fire districts to ensure that roadway design would accommodate emergency vehicles. Adherence to these design standards and other applicable regulations would result in adequate site distances and access for vehicles entering and leaving individual project sites. Additionally, all future transportation infrastructure improvement projects associated with the CAP would be subject to review by the County and responsible emergency service agencies for consistency with all applicable emergency access and design standards.

Therefore, potential impacts to emergency access would be less than significant through implementation of the applicable General Plan Policy SA-23; compliance with existing federal, State, and local requirements that regulate construction activities and design standards; and completion of subsequent project-level planning and environmental review. For these reasons, there would be no new or substantially more severe impacts to emergency access compared to those identified in the GPU EIR. The impact would remain *less than significant*.

MITIGATION MEASURES

No mitigation is required.

9 SUMMARY OF IMPACTS AND THEIR DISPOSITION

This chapter provides (1) a summary of the project's potential impacts, including significant and unavoidable impacts, impacts that can be reduced to a less-than-significant level with mitigation, and impacts that would be less than significant without mitigation; (2) a discussion of the significant and irreversible environmental changes that would be caused by the project; (3) an evaluation of the cumulative impacts of the project; and (4) an evaluation of the project's potential for growth-inducing impacts.

9.1 SUMMARY OF IMPACTS BY SIGNIFICANCE DETERMINATION

This section presents a summary of the conclusions reached in the evaluation of the project in Chapters 4–8 of this SEIR. The following summary describes the significance conclusions for the General Plan with the CAP. For a tabulated summary of the CAP's potential impacts, applicable mitigation measures, and significance determinations, see Table ES-1 in the Executive Summary.

9.1.1 SIGNIFICANT EFFECTS THAT CANNOT BE AVOIDED

Section 15126.2(b) of the CEQA Guidelines requires that an EIR describe any significant impacts that cannot be avoided, even with the implementation of feasible mitigation measures. The evaluation of resources in Chapters 4–8 of this SEIR identifies significant and unavoidable impacts in the following categories.

AIR QUALITY

RESULT IN INCONSISTENCY WITH AN APPLICABLE AIR QUALITY PLAN

Implementation of the General Plan would result in emissions of air pollutants that would exceed Sacramento Metropolitan Air Quality Management District (SMAQMD) thresholds, which conflicts with the goals of the State Implementation Plan. Implementation of the CAP would not increase development potential beyond what was assumed and analyzed in the GPU EIR, nor would it result in changes to existing land use and zoning designations. Implementation of the CAP would not increase operational air quality emissions such that they would exceed SMAQMD standards beyond what was considered in the GPU EIR. The CAP would not result in substantially more severe impacts related to a conflict with an applicable air quality plan than were disclosed in the GPU EIR. The CAP's contribution to impacts would not be substantial and overall impacts would remain significant and unavoidable, as identified in the GPU EIR.

RESULT IN A CUMULATIVELY CONSIDERABLE NET INCREASE OF SHORT-TERM CONSTRUCTION EMISSIONS OF CRITERIA POLLUTANTS AND PRECURSORS (NO_x, ROG, PM₁₀, AND PM_{2.5})

The GPU EIR determined that impacts related to construction-related emissions of criteria air pollutants would be significant and unavoidable. Although the CAP does not include any site-specific designs or proposals for development, implementation of the

CAP measures may result in construction activities that could generate criteria air pollutants and precursors. Mitigation would include implementation of SMAQMD best management practices to reduce fugitive dust emissions. Construction activities associated with implementation of the CAP measures would be minor and, with the implementation of SMAQMD best management practices, would not exceed the applicable thresholds for criteria pollutants. The CAP's contribution to impacts would not be substantial and overall impacts would remain significant and unavoidable, as identified in the GPU EIR.

RESULT IN A CUMULATIVELY CONSIDERABLE NET INCREASE OF LONG-TERM OPERATIONAL EMISSIONS OF CRITERIA POLLUTANTS AND PRECURSORS (NO_x, ROG, PM₁₀, AND PM_{2.5})

Implementation of the General Plan could result in long-term operational emissions that could exceed local thresholds, resulting in significant and unavoidable impacts. The CAP is intended to reduce greenhouse gas (GHG) emissions. Many of the CAP measures would have the co-benefit of improving air quality, and implementation of the CAP measures would not result in new substantial adverse impacts related to operational criteria pollutant emissions beyond what was already disclosed in the GPU EIR. The CAP's contribution to impacts would not be substantial and overall impacts would remain significant and unavoidable, as identified in the GPU EIR.

BIOLOGICAL RESOURCES

RESULT IN DISTURBANCE OR LOSS OF SPECIAL-STATUS PLANTS OR WILDLIFE AND HABITAT

The GPU EIR determined that implementation of the General Plan would have a significant and unavoidable impact on special-status species. The types of projects that could result from CAP implementation and the locations of these projects are consistent with those described in the GPU EIR. Additionally, potential impacts on special-status species that could result from future projects that would occur under the CAP would be consistent with and would not increase the severity of impacts described in the GPU EIR. Further, measures that encourage the planting of trees, enhancement of the urban forest, and landscaping with native and drought-tolerant vegetation would likely improve habitat for special-status species, particularly wildlife. There would be no new or substantially more severe significant impacts on special-status species (including critical habitat areas) compared to those identified in the certified GPU EIR. The CAP's contribution to impacts would not be substantial and overall impacts would remain significant and unavoidable, as identified in the GPU EIR.

RESULT IN DEGRADATION OR LOSS OF RIPARIAN HABITAT OR OTHER SENSITIVE NATURAL COMMUNITIES

The GPU EIR determined that implementation of the General Plan would have a significant and unavoidable impact related to riparian habitat and native trees, including oak woodlands. The types of projects that would result from CAP implementation and the locations of these projects are consistent with those described in the GPU EIR and potential impacts on riparian habitat and sensitive natural communities that could result from CAP implementation would be consistent with the impacts described in the GPU EIR. Therefore, there would be no new or substantially more severe significant impacts

on riparian habitat or other sensitive natural communities compared to those identified in the certified GPU EIR. The CAP's contribution to impacts would not be substantial and overall impacts would remain significant and unavoidable, as identified in the GPU EIR.

RESULT IN DEGRADATION OR LOSS OF STATE OR FEDERALLY PROTECTED WETLANDS

The GPU EIR determined that implementation of the General Plan would have a significant and unavoidable impact related to wetlands. The types of projects that would result from CAP implementation and the locations of these projects are consistent with those described in the GPU EIR. Additionally, impacts on wetlands that could result from CAP implementation would be consistent with and would not increase the severity of impacts as described in the GPU EIR. Therefore, there would be no new or substantially more severe significant impacts on State or federally protected wetlands compared to those identified in the certified GPU EIR. The CAP's contribution to impacts would not be substantial and overall impacts would remain significant and unavoidable, as identified in the GPU EIR.

INTERFERE WITH WILDLIFE MOVEMENT CORRIDORS OR IMPEDE THE USE OF WILDLIFE NURSERIES

The GPU EIR determined that implementation of the General Plan would have a significant and unavoidable impact related to special-status species habitats, which may support wildlife corridors or wildlife nursery sites. The types of projects that would result from CAP implementation and the locations of these projects are consistent with those described in the GPU EIR. Additionally, potential impacts on nesting birds, wildlife corridors, and wildlife nursery sites resulting from projects under the CAP would be consistent with and would not increase the severity of impacts described in the GPU EIR. Therefore, there would be no new or substantially more severe significant impacts on nesting birds, wildlife movement corridors or wildlife nursery sites compared to those identified in the certified GPU EIR. The CAP's contribution to impacts would not be substantial and overall impacts would remain significant and unavoidable, as identified in the GPU EIR.

CONFLICT WITH LOCAL POLICIES AND ORDINANCES

The GPU EIR determined that implementation of the General Plan would have a significant and unavoidable impact related to conflict with local policies and ordinances. As future projects that could occur from CAP implementation would comply with the County Tree Preservation Ordinance, there would be no conflict with local policies or ordinances. Therefore, there would be no new or substantially more severe significant impacts related to conflict with local policies or ordinances compared to those identified in the certified GPU EIR. The CAP's contribution to impacts would not be substantial and overall impacts would remain significant and unavoidable, as identified in the GPU EIR.

GREENHOUSE GASES AND CLIMATE CHANGE

GENERATE GREENHOUSE GAS EMISSIONS, EITHER DIRECTLY OR INDIRECTLY, THAT MAY HAVE A SIGNIFICANT IMPACT ON THE ENVIRONMENT

The GPU EIR determined that implementation of the General Plan would have a significant and unavoidable impact related to compliance with Assembly Bill 32 due to the uncertain nature of the impact. The CAP has been developed to reduce GHG emissions in the unincorporated county. Implementation of the CAP measures and associated actions related to government operations would reduce GHG emissions by 36,400 metric tons carbon dioxide equivalent (MTCO_{2e}) by 2030 and 34,500 MTCO_{2e} by 2045. Implementation of the CAP measures and associated actions related to community-wide activities would reduce community emissions by 1,427,900 and 1,243,200 MTCO_{2e}/year in 2030 and 2045, respectively. Implementation of the CAP would achieve the 2030 and 2045 GHG emissions reduction targets. The CAP's contribution to impacts would not be substantial and overall impacts would remain significant and unavoidable, as identified in the GPU EIR.

TRANSPORTATION

ELIMINATE OR ADVERSELY AFFECT BICYCLE, PEDESTRIAN, AND TRANSIT FACILITIES

The GPU EIR determined that impacts related to bicycle and pedestrian facilities would be less than significant, but impacts related to transit facilities would be significant and unavoidable due to uncertainties related to future funding to provide adequate transit services. Implementation of the CAP would support bicycle and pedestrian network improvements. For example, implementation of Measure GHG-12 would include 66 pedestrian spot improvements, 51 miles of sidewalk gap closures, and 190 miles of bicycle projects by 2030. The CAP would enhance the availability, efficiency, and safety of alternative transportation facilities while increasing the comfort of users. The CAP's contribution to the impacts would not be substantial, but the overall impacts related to transit facilities would remain significant and unavailable as identified in the GPU EIR.

9.1.2 EFFECTS FOUND NOT TO BE SIGNIFICANT

The following impacts were determined to be less than significant:

AIR QUALITY

EXPOSE SENSITIVE RECEPTORS TO SUBSTANTIAL POLLUTANT CONCENTRATIONS

The GPU EIR determined that construction impacts related to the exposure of sensitive receptors to toxic air contaminants (TACs) would be less than significant. Implementation of the CAP could result in construction-related TACs during construction of new electric vehicle charging stations, new renewable energy systems, and building retrofits. However, these types of activities would be consistent with the types of construction evaluated in the GPU EIR. Construction impacts related to TAC emission would remain less than significant, as identified in the GPU EIR.

Operation of the projects necessary to facilitate the CAP's measures and actions would primarily involve sporadic, short-term maintenance activities requiring relatively few diesel-powered vehicles or pieces of equipment and potentially some long-term emissions of fugitive dust that would be controlled and regulated through SMAQMD rules. Further, operation of such projects would reduce building- and mobile source-related emissions compared to those that were accounted for in the GPU EIR. Therefore, CAP-related operational TAC emissions would not be substantially greater than those expected with General Plan implementation alone. Thus, implementation of the CAP would not result in a new impact related to TAC emissions not disclosed in the GPU EIR. Operational impacts related to TAC emission would be less than significant.

MOBILE-SOURCE CARBON MONOXIDE CONCENTRATIONS

The GPU EIR determined that impacts related to carbon monoxide (CO) would be less than significant. Implementation of the CAP would not result in an increase in vehicular traffic or associated emission that could cause CO hotspots. Implementation of the CAP would not result in new substantial adverse impacts related to CO concentration than disclosed in the GPU EIR. The CAP's contribution to the impacts would not be substantial and overall impacts would remain less than significant.

RESULT IN EXPOSURE TO OBJECTIONABLE ODORS

Impacts related to odors are not discussed in the GPU EIR; however, they were known and could have been evaluated at that time. Because construction activities would be temporary and odors would disperse rapidly with distance from sources, construction-generated odors would not adversely affect a substantial number of people. Implementation of CAP Measure GHG-14 would increase the diversion of waste to composting facilities from landfills, which would result in odors related to increased composted waste. General Plan Policy AQ-3 requires buffers or other appropriate exposure reduction measures between sensitive land uses and sources of odor, reducing impacts on sensitive land uses. In addition, all projects under the CAP would be required to comply with SMAQMD Rule 402 "Nuisance." Odor impacts related to implementation of the proposed CAP would be less than significant.

BIOLOGICAL RESOURCES

CONFLICT WITH AN ADOPTED HABITAT CONSERVATION PLAN

Because the South Sacramento Habitat Conservation Plan (SSHCP) was not adopted at the time that the GPU EIR was prepared, General Plan consistency with the SSHCP was not evaluated. Projects located in the SSHCP Plan Area would be required to comply with the SSHCP, including those implemented as part of the CAP. Projects are required submit a SSHCP Permit Application Form, and as part of the permit authorization under the SSHCP, these projects would likely be subject to SSHCP avoidance and minimization measures and payment of mitigation fees. These activities would also be consistent with General Plan Policies CO-61, CO-66, CO-76, and CO-140, which require compliance with the SSHCP. As future projects that could occur from CAP implementation would comply with the SSHCP, there would be no conflict with the provisions of the SSHCP. This impact would be less than significant.

GREENHOUSE GASES AND CLIMATE CHANGE

CONFLICT WITH ANY APPLICABLE PLAN, POLICY, OR REGULATION OF AN AGENCY ADOPTED FOR THE PURPOSE OF REDUCING THE EMISSIONS OF GREENHOUSE GASES

The GPU EIR determined that implementation of the General Plan would have a significant and unavoidable impact related to conflict with AB 32 (the only regulatory document adopted by the State at the time of preparation of the GPU EIR that set a GHG reduction goal). The proposed CAP would align with the GHG emissions reduction targets outlined in the 2022 Scoping Plan and AB 1279 and, therefore, would not result in new substantial impacts related to a conflict with an applicable GHG reduction plan not disclosed in the GPU EIR. The project's contribution to impacts would not be substantial and overall impacts would change from significant and unavoidable, as identified in the GPU EIR, to less than significant because the emissions reductions achieved by the CAP would align the County with the most recent statewide GHG reduction plans.

ENERGY

RESULT IN WASTEFUL, INEFFICIENT, OR UNNECESSARY CONSUMPTION OF ENERGY, DURING PROJECT CONSTRUCTION OR OPERATION

Impacts related to energy were not analyzed in the GPU EIR but were known and could have been evaluated at that time. The CAP measures and actions would result in the use of more efficient technology that would generally reduce energy demand and improve energy efficiency. The impacts would be less than those that would occur due to implementation of the General Plan without the proposed CAP. This impact would be less than significant.

OBSTRUCT A STATE OR LOCAL PLAN FOR RENEWABLE ENERGY OR ENERGY EFFICIENCY

Impacts related to energy were not directly analyzed in the GPU EIR. However, because the GHG reduction measures proposed within the CAP would require newer and more efficient technology to reduce GHG emissions, the impacts related to energy resources would be less than those that would occur due to implementation of the General Plan without the CAP. Additionally, the GHG reduction measures and their associated actions were designed to align with the energy efficiency goals of the 2022 Scoping Plan. Therefore, the CAP would not result in a new impact related to conflicts with or obstruction of a State or local plan for renewable energy or energy efficiency. This impact would be less than significant.

TRANSPORTATION

CONFLICT OR BE INCONSISTENT WITH CEQA GUIDELINES SECTION 15064.3, SUBDIVISION (B), RELATED TO VEHICLE MILES TRAVELED

Impacts related to VMT are not discussed in the GPU EIR. Implementation of the CAP would involve policies and programs to increase the use of alternative forms of transportation, which would reduce VMT. For example, CAP Measures GHG-08, GHG-09, GHG-10, GHG-12, GHG-13, and GOV-01 could result in expanded transit and

bicycle and pedestrian facilities, the implementation of transportation demand management programs to reduce the use of single occupancy vehicles, the revision of parking standards, the acceleration of infill development in priority areas, and initiatives to encourage increased alternative transportation and transit use in the unincorporated county. Implementation of Measure GHG-09 could result in a 15 percent reduction in annual VMT from new development. Therefore, implementation of the CAP would reduce VMT in the unincorporated county and would not result in new VMT impacts that are not disclosed in the GPU EIR. This impact would be less than significant.

SUBSTANTIALLY INCREASE HAZARDS DUE TO A DESIGN FEATURE OR INCOMPATIBLE USES

The GPU EIR determined that impacts related to transportation safety would be less than significant. Implementation of the CAP would involve measures that could result in new or modified transportation infrastructure. Future discretionary projects would be subject to review by County staff to ensure hazards during construction are minimized and that all safety standards are met. Individual projects would be required to obtain necessary encroachment permits and develop traffic control plans. Potential impacts related to transportation hazards would remain less than significant through compliance with existing federal, State, and local requirements that regulate construction activities and design standards. For these reasons, there would be no new or substantially more severe impacts from hazardous design features or incompatible uses as compared to those identified in the GPU EIR. The impact would remain less than significant.

RESULT IN INADEQUATE EMERGENCY ACCESS

The GPU EIR determined that impacts related to emergency access would be less than significant because the General Plan incorporates policies related to transportation facility planning, design, and implementation in accordance with accepted design standards and guidelines. Future CAP projects would comply with General Plan Policy SA-23, which requires new development to provide unobstructed emergency access to structures by firefighting equipment and personnel. Additionally, future discretionary projects would be subject to review by County and emergency service staff to ensure emergency access is maintained. The CAP's contribution to the impacts would not be substantial and overall impacts would remain less than significant.

9.2 IRREVERSIBLE ENVIRONMENTAL CHANGES

CEQA requires that EIRs assess whether a project would result in significant irreversible changes to the physical environment. The CEQA Guidelines discuss three categories of significant irreversible changes that should be considered. Each is addressed below.

9.2.1 CHANGES IN LAND USE WHICH COMMIT FUTURE GENERATIONS

The CAP could result in the installation of infrastructure including electric vehicle charging stations and on-site renewable energy generation. The CAP is proposed to reduce GHG emissions in the unincorporated county and from County operations and would not result in land use changes. The CAP proposes no change to General Plan

land use or zoning code designations for any parcel in the unincorporated county. Instead, implementation of the CAP, once approved, would rely on already-adopted General Plan land use and zoning code designations. The CAP does not include individual location-specific projects to facilitate the measures and actions included in the CAP. Future generations would not be committed to any particular land use as a result of the CAP implementation. The CAP is a policy document intended to reduce community-wide GHG emissions and would support development already allowed under the General Plan.

9.2.2 IRREVERSIBLE DAMAGE FROM ENVIRONMENTAL ACCIDENTS

No significant environmental damage, such as accidental spills or explosion of a hazardous material, is anticipated with future development required to implement CAP measures and actions. As described in Chapter 1, “Introduction,” the GPU EIR determined that the potential for accidental release or disturbance of hazardous materials would be addressed through compliance with laws that regulate the transport and management of potentially hazardous materials and require that any contaminated sites are identified and contained or remediated prior to development. Projects that implement the CAP would be required to comply with all applicable federal, State, and local regulations during construction and operation and would be required to obtain permits and comply with appropriate regulatory agency standards designed to avoid hazardous materials releases. Furthermore, existing regulations preclude development of any known cleanup site until the hazardous condition has been abated to the point that the proposed use will neither aggravate the hazardous condition nor be adversely affected by the hazardous condition.

9.2.3 CONSUMPTION OF NONRENEWABLE RESOURCES

Consumption of nonrenewable resources would include increased energy consumption, conversion of agricultural lands, and lost access to mining reserves. Implementation of the CAP would not change the extent or character of land disturbance from what was evaluated in the GPU EIR. As discussed in Chapter 1, “Introduction,” the CAP would not result in new or more severe impacts, including cumulative impacts, related to agriculture and forestry resources or mineral resources than disclosed in the GPU PEIR.

The CAP would not result in a large commitment of nonrenewable resources. The CAP is a policy document that charts a path toward carbon neutrality in the unincorporated areas of Sacramento County. Future development that occurs to implement CAP measures and actions would consume fossil fuels and other nonrenewable or slowly renewable resources through the operation of vehicles and equipment for site grading and construction activities, but these would not be large commitments. Measures that require more battery storage of renewable energy could lead to increased use of lithium and other heavy metals. Other resources, including materials such as wood products, metals, cement, asphalt, and other products, would be used or consumed during construction or would be permanently committed through development required to implement the CAP. However, CAP implementation is also anticipated to reduce water and natural gas consumption while increasing the use of renewable electricity. As a

result, the long-term use of these nonrenewable resources would be more efficient. For further discussion of energy use, see Chapter 6, “Energy.”

9.3 GROWTH INDUCEMENT

CEQA Section 21100(b)(5) specifies that the growth-inducing impacts of a project must be addressed in an EIR. A project can induce growth directly, indirectly, or both. Direct growth inducement would result if, for instance, a project involved construction of new housing. A project also can have indirect growth inducement potential if it would establish substantial new permanent employment opportunities (e.g., commercial, industrial, or governmental enterprises) that would encourage development of new housing for employees, or if it would involve a substantial construction effort creating short-term employment opportunities. Similarly, under CEQA, a project would indirectly induce growth if it would remove an obstacle to additional growth and development, such as removing a constraint on a required public service. Infrastructure projects could also indirectly stimulate growth by enhancing access to properties or increasing their desirability for development.

Growth inducement itself is not an environmental effect but may foreseeably lead to environmental effects. If substantial growth inducement occurs, it can result in secondary environmental effects, such as increased demand for housing, demand for other community and public services and infrastructure capacity, increased traffic and noise, degradation of air or water quality, degradation or loss of plant or animal habitats, conversion of agricultural and open-space land to urban uses, and other effects.

9.3.1 GROWTH-INDUCING IMPACTS

The General Plan, as amended, provides land use development patterns and growth policies that allow the planned and orderly expansion of development supported by adequate public services. The GPU EIR discusses the growth-inducing impacts of the General Plan in Chapter 17, “Summary of Impacts and Their Disposition” (pages 17-16 and 17-17). The detailed discussion provided in the GPU EIR is incorporated into this SEIR by reference. As described therein, implementation of the General Plan is considered a growth accommodating action because it provides direction for the planning and management of population growth. It is also considered a growth-inducing action because it facilitates economic expansion and associated infrastructure improvements (i.e., water, sewer, and circulation systems) that could further remove existing obstacles to growth. This SEIR analyzes whether the CAP would result in growth inducing impacts beyond what was anticipated for the General Plan. A project that would induce unplanned growth could indirectly cause additional adverse environmental and public services impacts not previously envisioned.

POPULATION GROWTH

The project is not by itself directly growth inducing because it does not increase densities or modify intensities of allowable land uses and does not directly include site-

specific projects that would induce population growth. The CAP would implement the requirements of the General Plan and GPU EIR to establish GHG emission reduction targets and create a plan that contains strategies and measures to achieve those targets. The project would not remove a constraint on a required public service or stimulate growth by enhancing access to properties that were previously inaccessible.

Approval and implementation of the project may result in improvements to alternative modes of transportation, including bicycle and pedestrian infrastructure, which would reduce GHG emissions by improving multimodal transportation options through increased connectivity, but would not increase wholesale access to any areas within the county by constructing new roadways. Actions that commit the County to work with partners to promote and support on-site renewable energy generation and storage are intended to increase renewable energy generation and use in the unincorporated area but would not be anticipated to substantially diminish an existing obstacle to growth. To the extent that programs initiated by the CAP update indirectly result in new or different housing, this development would be a modified expression of the growth anticipated and evaluated in the GPU EIR. No changes to General Plan land use designations are proposed under the CAP.

As explained further in Chapter 1, “Project Description,” the CAP has been prepared consistent with the tiering and streamlining provisions of CEQA Guidelines Section 15183.5, which allows for streamlining future project-specific GHG emissions analyses where projects considered by the County are within the buildout assumptions included in a GHG reduction plan and can demonstrate consistency with the CAP measures and actions. A consistency review checklist would be developed based on the final CAP measures and actions to provide a process and evidence by which subsequent development projects would demonstrate consistency with the CAP. If subsequent projects are found to be consistent with the CAP (and within the growth projections assumed therein), then the environmental documents prepared for these projects can rely upon and incorporate by reference the cumulative GHG analysis for the CAP, as presented in this SEIR. Evaluation of all other technical resource topics considered under CEQA would still be required. The CAP’s GHG emissions inventory and forecasts are based on predicted growth in housing units and employees under the General Plan, along with reasonably foreseeable growth associated with recently approved and pending development applications that would amend the General Plan.

The streamlining provision may reduce the need for subsequent development projects that are within the scope of projected growth to undertake project-specific analysis of GHG emissions and identify mitigation measures. However, establishing a program for addressing cumulative emissions from the community would not facilitate growth or indirectly remove obstacles to growth. Therefore, to the extent that future projects streamline GHG analyses through demonstrated CAP consistency, this would not result in indirect inducement of growth beyond the scope of the GPU EIR.

ECONOMIC GROWTH

Implementation of the project would likely result in some capital improvements and may result in incentivization of energy efficiency and renewable energy improvements,

expansion of alternatively fueled vehicles, water conservation improvements, and expansion of waste collection services. These actions would result in a small number of new jobs, specifically related to construction and maintenance services, but are not expected to result in a substantial increase in the demand for additional housing or services. These jobs would likely be filled by the existing labor pool within the county, and are, therefore, not expected to be growth inducing.

9.4 CUMULATIVE IMPACTS

9.4.1 CEQA GUIDELINES REQUIREMENTS

CEQA Guidelines Section 15130(a) requires that an EIR discuss cumulative impacts of a project “when the project’s incremental effect is cumulatively considerable.” As defined in CEQA Guidelines Section 15355, a cumulative impact consists of an impact that is created as a result of the combination of the project evaluated in the EIR together with other projects causing related impacts. Pursuant to CEQA Guidelines Section 15065(a)(3), “cumulatively considerable” means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, other current projects, and probable future projects. Where a lead agency is examining a project with an incremental effect that is not “cumulatively considerable,” the lead agency need not consider the effect significant. When the combined cumulative impact associated with the project’s incremental effect and the effects of other projects is not significant, the EIR shall briefly indicate why the cumulative impact is not significant and is not discussed in further detail in the EIR. Furthermore, according to CEQA Guidelines Section 15130(a)(1), there is no need to evaluate cumulative impacts to which the project does not contribute.

The discussion of cumulative impacts shall reflect the severity of the impacts and their likelihood of occurrence, but the discussion need not provide detail as great as that provided for the impacts that are attributable to the project alone, according to CEQA Guidelines Section 15130(b). Additionally, an EIR shall examine reasonable, feasible options for mitigating or avoiding the project’s contribution to any significant cumulative effects. An EIR may determine that a project’s contribution to a significant cumulative impact will be rendered less than cumulatively considerable and thus not significant when, for example, a project funds its fair share of a mitigation measure designed to alleviate the cumulative impact, according to CEQA Guidelines Section 15130(a)(3). The discussion should be guided by standards of practicality and reasonableness and should focus on the cumulative impact to which the identified project contributes.

CEQA Section 21094(e)(1) states that if a lead agency determines that a cumulative effect has been adequately addressed in a prior environmental impact report, that cumulative effect is not required to be examined in a later EIR. The section further indicates that cumulative effects are adequately addressed if the cumulative effect has been mitigated or avoided as a result of the prior EIR and adopted findings or can be mitigated or avoided by site-specific revisions, imposition of conditions, or other means in connection with the approval of the later project (CEQA Section 21094[e][4]).

9.5 SCOPE OF THE CUMULATIVE ANALYSIS

The CEQA Guidelines identify two basic methods for establishing the cumulative environment in which the project is to be considered: (1) the use of a list of past, present, and probable future projects or (2) the use of adopted projections from a general plan, other regional planning document, or a certified EIR for such a planning document.

This analysis is based on the second approach. The cumulative impact evaluation builds on the cumulative conditions described in the GPU EIR. As appropriate, the cumulative environmental setting has been updated from the 2011 GPU EIR based on the development forecasts in the Sacramento Area Council of Governments' (SACOG's) 2020 Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS), which generally represents a reasonably foreseeable pattern and rate of growth for the region. The MTP/SCS included development projections for Sacramento County and its incorporated cities, as well as for several nearby counties and cities, based on adopted and in-development General Plans, Specific Plans, and Community Plans in each jurisdiction. The *Draft Environmental Impact Report for the 2020 Metropolitan Transportation Plan/Sustainable Communities Strategy* (SACOG 2019) (State Clearinghouse No. 2019049139) provides an evaluation of regional cumulative conditions.

9.5.1 CUMULATIVE IMPACT ANALYSIS METHODOLOGY

For purposes of this EIR, the project would have a significant cumulative effect if it would meet either of the following criteria.

- The cumulative effects of related projects (past, current, and probable future projects) without the project are not significant but the project's incremental impact is substantial enough, when added to the cumulative effects, to result in a significant impact.
- The cumulative effects of related projects (past, current, and probable future projects) without the project are already significant and the project represents a considerable contribution to the already significant effect. The standards used herein to determine "considerable contribution" are that the impact either must be substantial or must exceed an established threshold of significance.

The cumulative impact analysis provided in this chapter evaluates whether the proposed CAP could result in new cumulatively considerable impacts or an increase in the severity of previously identified cumulative impacts that were identified in the GPU EIR pursuant to CEQA Guidelines Section 15162(b).

9.6 CUMULATIVE ISSUE AREAS

Cumulative impacts for each technical area evaluated in detail in this SEIR are discussed below. Based on the analysis in Chapter 1, "Introduction," the CAP would not cause a new cumulatively significant impact or contribute considerably to existing or

anticipated cumulatively significant effects related to aesthetics, agriculture and forestry resources, cultural resources, geology and soils, hazards and hazardous materials, hydrology and water quality, land use and planning, mineral resources, noise and vibration, population and housing, tribal cultural resources, public services and recreation, utilities and service systems, and wildfire. Significance criteria, unless otherwise specified, are the same for cumulative impacts as project impacts for each environmental topic area.

9.6.1 AIR QUALITY

CUMULATIVE SETTING

As described in Chapter 4, “Air Quality,” the county is within the Sacramento Valley Air Basin (SVAB), which is considered the cumulative setting boundary for this analysis. Sacramento County is currently in nonattainment for ozone, respirable particulate matter (PM₁₀), and fine particulate matter (PM_{2.5}) with respect to the California ambient air quality standards (CAAQS) and is in nonattainment for ozone and PM_{2.5} with respect to the national ambient air quality standards (NAAQS).

Ozone impacts are the result of cumulative emissions from numerous sources in the region and transport from outside the region. Ozone is formed in chemical reactions involving reactive organic gases (ROG), oxides of nitrogen (NO_x), and sunlight. All but the largest individual sources emit NO_x and ROG in amounts too small to have a measurable effect on ambient ozone concentrations by themselves. However, when all sources throughout the region are combined, they can result in severe ozone problems.

Particulate matter (PM), including PM₁₀ and PM_{2.5}, have a similar cumulative regional emphasis when they are entrained in the atmosphere and build to unhealthful levels over time. PM also has the potential to cause significant local problems during periods of dry conditions accompanied by high winds, and during periods of heavy earth-disturbing activities. PM may have cumulative local impacts if, for example, several unrelated grading or earth moving activities are underway simultaneously at nearby sites. Operation-related PM is less likely to result in local cumulative impacts as operational PM sources tend to be spread throughout the region (i.e., vehicles traveling on roads), not affecting any one receptor. However, substantial increases in traffic on roadways already experiencing high traffic volumes may result in considerable contributions of PM to nearby existing land uses.

Although carbon monoxide (CO) can accumulate with traffic at intersections, it is not evaluated at a regional scale because it disperses rapidly with distance from the source under normal meteorological conditions. Toxic air contaminants (TACs) behave similarly. As discussed in Chapter 4, “Air Quality,” TAC concentrations substantially decrease within a distance of 500 feet from a source; therefore, it is unlikely that project-related sources of TACs would combine with emissions from other projects in the area to produce adverse TAC concentration. Therefore, CO and TACs are not significant at a regional air-basin level.

Because of the existing nonattainment status of Sacramento County (as discussed above), there is an existing adverse cumulative condition regarding air quality. Therefore, ROG, NO_x, and PM emissions from cumulative development are cumulatively significant in the air basin.

CUMULATIVE IMPACTS EVALUATION

GENERAL PLAN UPDATE EIR AND SACRAMENTO AREA COUNCIL OF GOVERNMENTS MTP/SCS EIR DETERMINATION

The GPU EIR did not identify any significant cumulative impacts related to air quality. Notably, the GPU EIR only addressed cumulative impacts related to the exposure of sensitive receptors to high concentrations of CO emissions and did not address any other cumulative impact pertaining to air quality (GPU EIR, pp.11-73 to 11-103). As described above, the air basin is in nonattainment for several pollutants. Based on the most recent available information about the cumulative condition, there is an existing adverse cumulative effect. The EIR for the SACOG MTP/SCS similarly concludes that projected growth will result in a potentially significant cumulative impact from air emissions adversely affecting a number of air basins (SACOG 2019: 19-20).

PROPOSED CLIMATE ACTION PLAN IMPACT ANALYSIS

As explained further in Chapter 4, “Air Quality,” Sacramento Metropolitan Air Quality Management District (SMAQMD) provides guidance for evaluating air quality impacts. In accordance with SMAQMD guidance, cumulative impacts can be assessed qualitatively for consistency with the most recently adopted air quality plan in the region. The CAP would not result in any changes to the adopted General Plan, which informs the growth projections of the SACOG regional vehicle miles traveled (VMT) modeling and the SVAB’s ability to attain ambient air quality standards. The CAP also supports infill development, as outlined in the General Plan and prioritized in the 2020 MTP/SCS.

In addition, SMAQMD-adopted significance thresholds are cumulative in nature; that is, they identify the level of project-generated emissions above which impacts would be cumulatively considerable. These thresholds represent the level above which emissions of a given project would impede the air basin from achieving ambient air quality standards, considering anticipated growth and associated emissions in the region.

CAP implementation would not generate substantial additional emissions and would not result in a new or greater contribution to cumulative effects on air quality. Although there is an existing cumulative impact in the SMAQMD related to nonattainment of several pollutants related to the CAAQS and NAAQS, the CAP is expected to indirectly reduce projected emissions through programs designed to reduce GHG emissions. Thus, the CAP would not result in any new or substantially more severe impacts related to air quality and the project’s contribution to the significant cumulative impact would be **less than cumulatively considerable**.

9.6.2 BIOLOGICAL RESOURCES

CUMULATIVE SETTING

Generally, the geographic extent of cumulative impacts on biological resources consists of Sacramento County and the Central Valley region of California that supports similar biological resource values and functions to those of the unincorporated county.

Past and present actions by humans have substantially altered biological resources in the Central Valley region of California, including Sacramento County, specifically, compared to historical conditions. Among the most important of these past actions have been conversion of natural vegetation and habitats to agricultural and developed land uses; fill and alteration of aquatic habitats; flood control and water supply projects; and the introduction of invasive species, which in many cases have competed with, preyed upon, and degraded habitat for native species. More recently, the large-scale conversion of agricultural habitats to urban land uses has resulted in substantial loss of habitat for species such as State-listed Swainson's hawk that have adapted to use agricultural habitats in response to loss of their natural habitats.

Past, present, and foreseeable future urbanization in Sacramento County has contributed, and continues to contribute substantially to the loss of grassland, wetland, and agricultural habitats that are important to many species in the region, including federally listed and State-listed species like Swainson's hawk, vernal pool fairy shrimp, and vernal pool tadpole shrimp. The continued conversion of natural habitats would contribute to the ongoing decline of these habitats in the region and in the state. This represents an existing significant cumulative impact.

CUMULATIVE IMPACTS EVALUATION

GENERAL PLAN UPDATE EIR AND SACRAMENTO AREA COUNCIL OF GOVERNMENTS MTP/SCS EIR DETERMINATION

The GPU EIR determined that the General Plan could contribute to impacts due to substantial losses of wetland and riparian habitats, as well as the decline of listed species by removing large areas of listed species habitat and creating smaller isolated pieces of substandard habitat. There would be significant and unavoidable cumulative impacts on biological resources from General Plan implementation (GPU EIR, pp. 8-31 to 8-81). The EIR for the SACOG MTP/SCS similarly concludes that projected growth will result in a potentially significant cumulative impact on biological resources, indicating that there is an existing adverse condition from projected regional development (SACOG 2019: 19-20 and 19-21).

PROPOSED CLIMATE ACTION PLAN IMPACT ANALYSIS

As discussed in Chapter 5, "Biological Resources," of this SEIR, implementation of the CAP would include ground disturbance similar to the adopted General Plan because the extent of assumed land disturbance would not change substantially from what was evaluated in the GPU EIR.

The General Plan and related CAP projects would contribute to the countywide conversion of open space land to non-open space uses. However, the SSHCP was developed to minimize and mitigate impacts on plant and wildlife habitat (and associated species) resulting from this regional loss of open space lands. The SSHCP relies, in part, on compensation for such conversion through preservation of agricultural lands and preservation and creation of natural habitats to be managed in perpetuity through the establishment of conservation easements and preserves. The goal of the SSHCP is to provide approximately 36,282 acres of habitat preserve (Sacramento County et al. 2018). Because the SSHCP potentially provides a streamlined mechanism for impacts on resources covered under the plan, it is assumed that a majority of qualifying projects within the county would use the SSHCP for mitigation. Therefore, cumulative impacts on biological resources covered under the SSHCP would be less than significant.

Compliance with existing regulations, SSHCP, and General Plan policies and standards would ensure that the CAP's contribution to the cumulative impacts are addressed in a manner consistent with the GPU EIR analysis. There is no element of the proposed CAP that would substantially modify the General Plan's contributions to the cumulative impact. Therefore, the CAP would not result in a new or greater contribution to cumulative effects on biological resources beyond what was identified in the GPU EIR. The CAP's contribution to the cumulative impact would be **less than cumulatively considerable**.

9.6.3 ENERGY

CUMULATIVE SETTING

The geographic area considered for cumulative impacts regarding energy use is Sacramento County and the service area for Sacramento Municipal Utility District (SMUD). SMUD employs programs and mechanisms to support provision of services for new developments to be built within their service territory. The most common mechanism includes connection fees to recoup the cost of infrastructure required to service new developments through standard billing services. Additionally, energy efficiency, power management strategies, and conservation measures, reducing energy demand in existing development can serve to reduce additional energy infrastructure and services required for new development.

SMUD purchases, generates, and distributes electric power to a 900-square-mile service area in Sacramento County. Electricity purchased and produced by SMUD is currently generated from a variety of sources including hydro generation; cogeneration plants; advanced and renewable technologies such as wind, solar, and biomass/landfill gas power; and power purchased on the wholesale market. In the future, SMUD plans to provide 100 percent renewable electricity. Various federal, State, and local regulations govern the use of energy to limit the potential for wasteful, inefficient, or unnecessary consumption of energy. There is not an existing adverse cumulative condition related to inefficient use of energy.

CUMULATIVE IMPACTS EVALUATION

GENERAL PLAN UPDATE EIR AND SACRAMENTO AREA COUNCIL OF GOVERNMENTS MTP/SCS EIR DETERMINATION

The GPU EIR does not provide a clear conclusion related to cumulative energy efficiency impacts. However, the General Plan does include consistency with smart growth principals, such as planned transportation improvements focused on mixed uses, compact development, and transportation choices, which are associated with efficient use of energy (GPU EIR, pp. 9-93 to 9-132).

The SACOG MTP/SCS EIR combines the discussion of energy use with global climate change (SACOG 2019: 8-1 to 8-36). The discussion recognizes projected growth and development in the region that could result in increases in the demand for energy but finds that cumulative energy impacts would be less than significant with implementation of adopted land use plans and policies, including the MTP/SCS.

PROPOSED CLIMATE ACTION PLAN IMPACT ANALYSIS

Development that results from implementation of the CAP in the unincorporated County would be required to comply with the current building code, including requirements for achieving appropriate energy efficiency standards (e.g., Title 24 standards or better) and General Plan policies related to energy. Further, the project would not result in any significant cumulative energy impacts because the project would decrease the region's reliance on fossil fuels and would reduce energy consumption in the unincorporated area. Additionally, implementation of the CAP would include the installation of renewable energy generation systems which would increase electricity generation to offset increases in electricity demand during the ongoing transition from fossil fuel utility infrastructure to all-electric utility infrastructure. Finally, many of the measures proposed in the CAP would apply new standards and requirements to all development projects to reduce GHG emissions related to community and County operations and overall energy demand. By decreasing reliance on fossil fuels, decreasing overall energy demand, improving energy efficiency, decreasing VMT and vehicle trips in the county, and increasing the use of renewable energy systems, the measures and actions within the CAP would reduce the potential for wasteful, inefficient, or unnecessary consumption of resources.

The CAP would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency. As stated above, the CAP includes measures and actions identified to improve energy efficiency and reduce energy use. If adopted, future projects that are consistent with the CAP would also be consistent with State and local plans for energy efficiency.

The CAP would promote energy efficiency and would not result in the wasteful or inefficient use of energy. Thus, there is not an existing adverse cumulative condition and the project's contribution to a new significant cumulative impact **would be less than cumulatively considerable**.

9.6.4 GREENHOUSE GASES AND CLIMATE CHANGE

CUMULATIVE SETTING

Climate change is a global problem. GHGs are global pollutants (unlike criteria air pollutants and toxic air contaminants, which are pollutants of regional and local concern). Whereas most pollutants with localized air quality effects have relatively short atmospheric lifetimes (approximately one day), GHGs have long atmospheric lifetimes (one year to several thousand years). GHGs persist in the atmosphere long enough to be dispersed around the globe. Although the lifetime of any GHG molecule depends on multiple variables and cannot be determined with any certainty, it is understood that more carbon dioxide (CO₂) is emitted into the atmosphere than is sequestered by ocean uptake, vegetation, and other forms of sequestration. Of the total annual human-caused CO₂ emissions, approximately 55 percent are estimated to be sequestered through ocean and land uptake every year, averaged over the last 50 years, whereas the remaining 45 percent of human-caused CO₂ emissions remain stored in the atmosphere (IPCC 2014:467).

Human-caused emissions of GHGs in excess of natural ambient concentrations are understood to be responsible for intensifying the greenhouse effect and leading to a trend of unnatural warming of the earth's climate, known as global climate change or global warming. Climate change is a global problem caused by global pollutants and is inherently cumulative. Therefore, the cumulative setting for climate change is global, and there is an existing significant cumulative impact.

CUMULATIVE IMPACTS EVALUATION

GENERAL PLAN UPDATE EIR AND SACRAMENTO AREA COUNCIL OF GOVERNMENTS MTP/SCS EIR DETERMINATION

The GPU EIR concludes that the effects of climatic changes on the Sacramento region are potentially significant and can only be mitigated through both adaptation and reduction strategies. Because the EIR included mitigation measures (Mitigation Measure CC-1 and Mitigation Measure CC-2) that require the County to adopt a CAP containing both adaptation and reduction strategies and programs to require mitigation of projects that may result in significant greenhouse gas emissions and because the County implemented changes in government operations, the GPU EIR found that the County is implementing all feasible strategies to reduce the effects of climate change on the region (see page 12-26). In concert with federal and State activities, the mitigation is intended to offset the climate change impacts of General Plan implementation. On pages 12-38 and 12-39, the discussion finds:

Ideally, this mitigation would reduce the Project emissions and climate change impacts to levels that are not cumulatively significant, but there are many unknown variables and implementation challenges. Research is constantly generating new and better data, and modeling software for local emissions continues to be refined. It is possible that the 15% emissions reduction estimated by the state will be revised upward, or future modeling

refinements will require the County to reexamine and revise the baseline emissions inventory. Even if the baseline analysis and target were unchanged, the County contribution to this global phenomenon can only be called cumulatively inconsiderable if all other parts of the world contribute to the needed reduction as well. If the County, or the State, or even the United States were the only entities to reach the necessary targets, the worst effects of climate change would not be averted. Therefore, though the County is taking all reasonable and feasible steps to reduce the Project effects on climate change, the impact is still significant and unavoidable, due to the uncertain nature of the impact.

The SACOG MTP/SCS EIR concludes that although SACOG has demonstrated that the MTP/SCS will achieve the assigned regional GHG reduction target for 2035, there is an unmet gap in achieving the statewide goals for GHG reduction. For this reason, the contribution of the proposed MTP/SCS to this cumulative impact is cumulatively considerable and would be potentially significant. Implementation of Mitigation Measures GHG-1 to GHG-3 would minimize the contribution of the MTP/SCS to cumulative GHG emissions and global climate change but would not reduce them to less-than-significant levels. The cumulative GHG emissions and global climate change impacts resulting from the MTP/SCS would be significant and unavoidable (SACOG 2019: 19-22 to 19-23).

PROPOSED CLIMATE ACTION PLAN IMPACT ANALYSIS

As described in Chapter 7, “Greenhouse Gas Emissions and Climate Change,” limited release of GHG emissions would be associated with construction activities that would be required to implement CAP programs. These additional emissions would not result in a new or greater contribution to cumulative effects related to GHG emissions beyond the cumulatively considerable and a significant unavoidable impact identified in the GPU EIR. The underlying purpose of the proposed CAP is to reduce the County’s contribution to global climate change to levels that are established by the State to limit exacerbation of the existing cumulative condition. This investment in infrastructure upgrades would be offset by projected reductions in GHG emissions. Thus, the CAP’s contribution to the significant cumulative impact **would be less than cumulatively considerable**.

9.6.5 TRANSPORTATION

CUMULATIVE SETTING

The County is the geographic scope for the analysis of the impacts related to a program, plan, ordinance, or policy addressing the circulation system, substantially increasing hazards due to geometric features or incompatible uses, and inadequate emergency access. The geographic scope of analysis for cumulative impacts related to VMT includes the Sacramento Region, based on the County Transportation Analysis Guidelines.

CUMULATIVE IMPACTS EVALUATION

GENERAL PLAN UPDATE EIR AND SACRAMENTO AREA COUNCIL OF GOVERNMENTS MTP/SCS EIR DETERMINATION

The GPU EIR evaluated the potential transportation and circulation effects of the adopted General Plan (GPU EIR, pp. 9-28 to 9-62). The GPU EIR concludes that there would be less-than-significant impacts related to design hazards, emergency access, and transit, bicycle, and pedestrian facilities. The General Plan EIR does not evaluate traffic impacts in terms of VMT. Prior to the passage of Senate Bill (SB) 743, level of service was used to address potential vehicle delay. Public Resources Code (PRC) Section 21099 and California Code of Regulations (CCR) Section 15064.3(a), now establish that vehicle miles traveled (VMT) is generally the most appropriate measure of transportation impacts.

As discussed in the SACOG MTP/SCS EIR, although per-capita VMT within the region is forecast to continue to decline by 2040, total household-generated VMT is forecast to increase (largely due to adding new residents to the region). The VMT per-capita decline indicates that the projected land use pattern and planned transportation improvements assumed in the MTP/SCS would effectively work together to improve system efficiency and minimize increases in VMT. However, while the region will achieve VMT reductions per capita, they are not enough to help the State successfully achieve desired statewide goals. The MTP/SCS EIR indicates that there is an existing significant impact related to projected VMT (SACOG 2019: 19-30).

PROPOSED CLIMATE ACTION PLAN IMPACT ANALYSIS

With the exception of VMT, cumulative impacts from CAP-generated construction effects on transportation would result if other future planned construction activities were to take place close to construction occurring in conjunction with CAP implementation that could cumulatively combine to exacerbate the construction-related transportation impacts of the CAP. As described in Chapter 8, "Transportation," projects that result from implementation of the CAP would be subject to and implement General Plan and Active Transportation Plan policies applicable to transit, bicycle, and pedestrian facilities and services. Implementation of the individual projects would be subject to, and constructed in accordance with, applicable roadway design and safety guidelines and would be subject to review by Sacramento Metro Fire District to ensure emergency access is adequately provided and maintained. Additionally, these projects would be subject to all applicable County guidelines, standards, and specifications related to transit, bicycle, and/or pedestrian facilities. Therefore, the CAP's contribution to cumulative effects related to transit, bicycle, and pedestrian facilities and related to design features or incompatible uses and emergency access would not be considerable and, thus, not significant.

The discussion of VMT impacts associated with the project is inherently a cumulative impact analysis because it addresses project-generated VMT based on an efficiency threshold that is aligned with long-term goals and relevant plans. As detailed under

Impact TRAN-2, implementation of the proposed CAP would result in VMT reductions compared to buildout of the General Plan alone.

For the reasons articulated above, the project's contribution to new cumulative transportation impacts **would be less than cumulatively considerable**.

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10 BIBLIOGRAPHY

EXECUTIVE SUMMARY

No references are cited in this chapter.

CHAPTER 1, "INTRODUCTION"

No references are cited in this chapter.

CHAPTER 2, "PROJECT DESCRIPTION"

AEP. See Association of Environmental Professionals.

Association of Environmental Professionals (AEP), 2016. *Final White Paper. Beyond 2020 and Newhall: A Field Guide to New CEQA Greenhouse Gas Thresholds and Climate Action Plan Targets for California*. October 18, 2016.

California Energy Commission (CEC), 2024. *Review of SMUD 2022 Integrated Resource Plan*. CEC-200-2024-005. April 2024.

CEC. See California Energy Commission.

SACOG. See Sacramento Area Council of Governments.

Sacramento Area Council of Governments (SACOG), 2019. *2020 Metropolitan Transportation Plan/Sustainable Communities Strategy*. November 18, 2019.

Sacramento County, 2020. *County of Sacramento Transportation Analysis Guidelines*. September 10, 2020.

———, 2021. *Sacramento County 2021 Multi-jurisdictional Local Hazard Mitigation Plan Update*. Public Review Draft. July 2021.

———, 2022. *Sacramento County Active Transportation Plan*. June 2022.

———, 2024. *Sacramento County 2021 GHG Inventory (Corrected Final)*. April 2024.

Sacramento Metropolitan Air Quality Management District (SMAQMD), 2020. *Sacramento Metropolitan Air Quality Management District CEQA Guide*. April 2020. Chapter 6, "Greenhouse Gas Emissions."

Sacramento Municipal Utility District (SMUD), 2021. *2030 Zero Carbon Plan*. April 2021.

———, 2023 (April). *2030 Zero Carbon Plan Progress Report*. April 2023.

SMAQMD. See Sacramento Metropolitan Air Quality Management District.

SMUD. See Sacramento Municipal Utility District.

U.S. Fish and Wildlife Service and Sacramento County (USFWS and Sacramento County), 2018. *Environmental Impact Statement/Environmental Impact Report: South Sacramento Habitat Conservation Plan*. State Clearinghouse No. 2008062030.

USFWS. See U.S. Fish and Wildlife Service.

CHAPTER 3, "ALTERNATIVES"

California Air Resources Board, 2022. Draft 2022 Scoping Plan Update. May 10, 2022. Available: [Drhttps://ww2.arb.ca.gov/sites/default/files/2022-05/2022-draft-sp.pdf](https://ww2.arb.ca.gov/sites/default/files/2022-05/2022-draft-sp.pdf)raft 2022 Scoping Plan Update (ca.gov) Accessed July 11, 2024.

CARB. See California Air Resources Board.

County of Sacramento, 2011a. Fair Oaks Boulevard Corridor Plan. October 2011. <https://planning.saccounty.gov/LandUseRegulationDocuments/Documents/CommunityPlans/FairOaksBlvdCorridorPlan.pdf>. Accessed July 3, 2024.

———, 2011b. Fulton Avenue Special Planning Area Ordinance. February 23, 2011. https://planning.saccounty.gov/LandUseRegulationDocuments/Documents/SPA_NPA%20TitleIV/504-700_FultonAve.pdf. Accessed July 3, 2024.

———. 2011c. Sacramento County General Plan Update. Control No.: 02-GPB-0105. Findings of Fact and Statement of Overriding Considerations.

———, 2012. North Watt Avenue Corridor Plan. March 26, 2012. https://planning.saccounty.gov/PlansandProjectsIn-Progress/Documents/Specific%20Plans/North_Watt_Area_CP_0512/Part_1_Revised_NWACP_0312SM.pdf. Accessed July 3, 2024.

———, 2017. Fair Oaks Boulevard Complete Street Master Plan. December 13, 2017.

———, 2020b. Board Approves Declaration of Climate Emergency. December 17, 2020. <https://www.saccounty.gov/news/latest-news/Pages/Board-Approves-Declaration-of-Climate-Emergency.aspx>. Accessed July 4, 2024.

———, 2022. Re-Envision West Arden Arcade Plan. February 8, 2022. <https://planning.saccounty.gov/PlansandProjectsIn-Progress/Documents/Re-Envision%20West%20Arden%20Arcade%20Sustainable%20Communities%20and%20Complete%20Street%20Plan.pdf>. Accessed July 3, 2024

———, 2024a. Countywide Rezone Program. <https://planning.saccounty.gov/PlansandProjectsIn-Progress/Pages/Countywide-Rezone-Program.aspx/1000>. Accessed July 3, 2024.

———, 2024b. 2024-25 Recommended Budget Approved. June 5, 2024. <https://www.saccounty.gov/news/latest-news/Pages/2024-25-Recommended-Budget-Approved.aspx>. Accessed July 4, 2024.

———, 2024c. Fiscal Year 2024-2025 Annual Budget. Available: <https://bdm.saccounty.gov/Pages/AnnualBudgets.aspx>. Accessed: July 11, 2024.

SACOG. See Sacramento Area Council of Governments.

Sacramento Area Council of Governments(SACOG), 2024. SB 743. Available: <https://sb743-sacog.opendata.arcgis.com/>

Sacramento County Department of Transportation, 2016. Folsom Boulevard Complete Street Master Plan. April 8, 2016. <https://sacdot.saccounty.net/Documents/Projects/Folsom%20Boulevard%20Complete%20Street%20MP/Master%20Plan%20Documents%204-16/FINAL%20%20Folsom%20Blvd%20Complete%20Street%20Master%20Plan%204-12-16.pdf>. Accessed July 3, 2024.

———, 2021. Watt Avenue Complete Streets Project. April 22, 2021. <https://sacdot.saccounty.gov/Documents/Projects/Watt%20Ave%20Complete%20Streets/Watt%20Ave%20Complete%20Streets%20Project%20Report.pdf>. Accessed July 3, 2024.

———, 2024. Arden Way Complete Streets - Phase 1. <https://sacdot.saccounty.net/Pages/Arden-Way-Complete-Streets---Phase-1.aspx>. Accessed July 3, 2024.

U.S. Environmental Protection Agency (US EPA), 2024. Global Greenhouse Gas Overview. Updated April 11, 2024. [https://www.epa.gov/ghgemissions/global-greenhouse-gas-overview#:~:text=Electricity%20and%20Heat%20Production%20\(34,of%20global%20greenhouse%20gas%20emissions](https://www.epa.gov/ghgemissions/global-greenhouse-gas-overview#:~:text=Electricity%20and%20Heat%20Production%20(34,of%20global%20greenhouse%20gas%20emissions). Accessed July 4, 2024.

U.S. EPA. See U.S. Environmental Protection Agency.

University of California Institute of Transportation Studies, 2021. Driving California's Transportation Emissions to Zero. April 2021. Available: <https://escholarship.org/uc/item/3np3p2t0>

CHAPTER 4, "AIR QUALITY"

California Air Resources Board (CARB), 2003. *HARP Users Guide*, Version 1.0. Stationary Source Division, Sacramento, CA.

———, 2013. *California Almanac of Emissions and Air Quality—2013 Edition*. Air Quality Planning and Science Division. Available: <http://www.arb.ca.gov/aqd/almanac/almanac13/almanac13.htm>. Accessed January 4, 2017.

- , 2016. Ambient Air Quality Standards. Available: <https://www.arb.ca.gov/research/aaqs/aaqs2.pdf>. Last updated May 4, 2016. Accessed September 7, 2021.
- , 2020. *Evaluation of the Sacramento Area Council of Governments' SB 375 2020 Sustainable Communities Strategy*. October 2020. Available: https://ww2.arb.ca.gov/sites/default/files/2021-02/Evaluation%20of%20the%20GHG%20Emissions%20Reduction%20Quantification%20for%20the%20SACOG%20SB%20375%20October%202020_1.pdf. Accessed May 30, 2024.
- , 2022a. State Area Designation Maps. Air Quality Planning and Science Division. Available: <https://ww2.arb.ca.gov/resources/documents/maps-state-and-federal-area-designations>. Last updated November 2022. Accessed September 5, 2023.
- , 2022b. *2022 State Strategy for the State Implementation Plan*. Adopted September 2022. South Coast Air Quality Planning Section. Available: https://ww2.arb.ca.gov/sites/default/files/2022-08/2022_State_SIP_Strategy.pdf. Accessed October 11, 2023.
- , 2024. National Ambient Air Quality Standards (NAAQS) for PM. Available: <https://www.epa.gov/pm-pollution/national-ambient-air-quality-standards-naaqs-pm>. Last updated March 6, 2024. Accessed April 18, 2024.
- CARB. See California Air Resources Board.
- OEHHA. See Office of Environmental Health Hazard Assessment.
- Office of Environmental Health Hazard Assessment (OEHHA), 2015. *Risk Assessment Guidelines: Guidance Manual for Preparation of Health Risk Assessments*. Air, Community, and Environmental Health Branch. February 2015. Available: <https://oehha.ca.gov/media/downloads/cnr/2015guidancemanual.pdf>. Accessed November 20, 2020.
- Sacramento Metropolitan Air Quality Management District (SMAQMD), 2004. *2004 Revision to the California State Implementation Plan for Carbon Monoxide. Update Maintenance Plan for Ten Federal Planning Areas*. Adopted July 22, 2004. Available: [https://www.airquality.org/ProgramCoordination/Documents/1\)%202004%20CO%20Maintenance%20Plan.pdf](https://www.airquality.org/ProgramCoordination/Documents/1)%202004%20CO%20Maintenance%20Plan.pdf). Accessed May 23, 2024.
- , 2019. *Odor Complaints, Health Impacts and Monitoring Methods*. Final White Paper. Prepared by University of California, Los Angeles—Dr. Irwin “Mel” Suffet, Professor, and Dr. Scott Braithwaite, DEnv. UCLA-CARB Agreement Number 18RD010. September 3, 2019. Available: <https://ww2.arb.ca.gov/sites/default/files/classic/research/apr/past/18rd010.pdf>. Accessed September 5, 2023.

———, 2020. SMAQMD Thresholds of Significance Table. Available: <https://www.airquality.org/LandUseTransportation/Documents/CH2ThresholdsTable4-2020.pdf>. Last revised April 2020. Accessed March 26, 2024.

———, 2024a. Federal Planning. Available: <https://www.airquality.org/residents/air-quality-plans/federal-planning>. Accessed May 23, 2024.

———, 2024b. Diesel Particulate Matter Health Impacts. Available: <https://ww2.arb.ca.gov/resources/summary-diesel-particulate-matter-health-impacts>. Accessed June 25, 2024.

SCAQMD. See South Coast Air Quality Management District.

SMAQMD. See Sacramento Metropolitan Air Quality Management District.

South Coast Air Quality Management District. 2015. Brief of Amicus Curiae in Support of Neither Party. *Sierra Club v. County of Fresno*. Case No. S219783. April 13, 2015. Available: <https://www.courts.ca.gov/documents/9-s219783-ac-south-coast-air-quality-mgt-dist041315.pdf>.

———, 2024a. Criteria Pollutants. Available: <https://www.epa.gov/criteria-air-pollutants>. Accessed April 24, 2024.

———, 2024b. Green Book National Area and County-Level Multi-Pollutant Information. Available: <https://www.epa.gov/green-book/green-book-national-area-and-county-level-multi-pollutant-information>. Last updated March 27, 2004. Accessed April 24, 2024.

Van Gosen, B. S., and J. P. Clinkenbeard, 2011. *Reported Historic Asbestos Mines, Historic Asbestos Prospects, and Other Natural Occurrences of Asbestos in California*. Prepared by U.S. Geological Survey in cooperation with the California Geological Survey, USGS Open-File Report 2011-1188, CGS Map Sheet 59. Available: <https://pubs.usgs.gov/of/2011/1188/>. Accessed June 25, 2024.

CHAPTER 5, “BIOLOGICAL RESOURCES”

California Native Plant Society, 2024. Inventory of Rare and Endangered Plants of California (online edition, 9.5). Available: <http://www.rareplants.cnps.org>. Accessed May 2, 2024.

California Natural Diversity Database, 2024. Results of electronic records search. Sacramento: California Department of Fish and Wildlife, Biogeographic Data Branch. Accessed May 2, 2024.

CNDDDB. See California Natural Diversity Database.

CNPS. See California Native Plant Society.

Sacramento County, City of Rancho Cordova, City of Galt, Sacramento County Water Agency, Southeast Connector Joint Powers Authority. 2018. South Sacramento Habitat Conservation Plan. Available:
<https://planning.saccounty.net/PlansandProjectsIn-Progress/Pages/SSHCPPlan.aspx>. Accessed May 10, 2024.

CHAPTER 6, “ENERGY”

AFDC. See Alternative Fuels Data Center.

Alternative Fuels Data Center, 2024. Alternative Fueling Station Locator Tool. Available:
https://afdc.energy.gov/stations#/analyze?region=US-CA&country=US&access=public&access=private&fuel=BD&fuel=CNG&fuel=E85&fuel=HY&fuel=LNG&fuel=LPG&fuel=ELEC&lpg_secondary=true&hy_nonretail=true&ev_levels=all. Accessed: May 30, 2024.

California Air Resources Board, 2022. *2022 Scoping Plan*. Available:
<https://ww2.arb.ca.gov/sites/default/files/2023-04/2022-sp.pdf>. Accessed: May 15, 2024.

CARB. See California Air Resources Board.

California Energy Commission, 2019. *2019 California Energy Efficiency Action Plan*. Available:
<https://efiling.energy.ca.gov/GetDocument.aspx?tn=231261&DocumentContentId=62916>. Accessed: June 28, 2024.

———, 2024a. 2022 California Total System Electricity Generation. Available:
<https://www.energy.ca.gov/data-reports/energy-almanac/california-electricity-data/2022-total-system-electric-generation>. Accessed: May 15, 2024.

———. 2024b, California Annual Retail Fuel Outlet Report Results. Available:
<https://www.energy.ca.gov/media/3874>. Accessed: May 16, 2024.

———. 2024c, California Light Duty Vehicle Population Tool. Available:
<https://www.energy.ca.gov/data-reports/energy-almanac/zero-emission-vehicle-and-infrastructure-statistics-collection/light>. Accessed: June 26, 2024.

California Energy Commission and California Air Resources Board, 2003. *Reducing California’s Petroleum Dependence*. Available:
<https://ww2.arb.ca.gov/sites/default/files/classic/fuels/carefinery/ab2076final.pdf>.

CEC. See California Energy Commission.

EIA. See US Energy Information Administration.

Sacramento Municipal Utility District, 2024. 2022 Power Content Label. Available:
<https://www.smud.org/SMUDPCL>. Accessed: May 20, 2024.

SMUD. See Sacramento Municipal Utility District.

US Energy Information Administration, 2024. California State Profile and Energy Estimates. Available: <https://www.eia.gov/state/?sid=CA#tabs-2>. Accessed: May 20, 2024.

CHAPTER 7, “GREENHOUSE GASES AND CLIMATE CHANGE”

AEP. See Association of Environmental Professionals.

Association of Environmental Professionals (AEP), 2016. *Final White Paper. Beyond 2020 and Newhall: A Field Guide to New CEQA Greenhouse Gas Thresholds and Climate Action Plan Targets for California*. October 18, 2016.

California Air Resources Board (CARB), 2018. SB 375 Regional Greenhouse Gas Emissions Reduction Targets. Approved by the California Air Resources Board March 22, 2018. Available: <https://www.arb.ca.gov/cc/sb375/finaltargets2018.pdf>. Accessed August 23, 2023.

———, 2022. *2022 Scoping Plan for Achieving Carbon Neutrality*. Available: <https://ww2.arb.ca.gov/sites/default/files/2023-04/2022-sp.pdf>. Accessed September 15, 2023.

———, 2023a. Current California GHG Emission Inventory Data: 2000–2021 GHG Inventory (2023 Edition). Available: <https://ww2.arb.ca.gov/ghg-inventory-data>. Accessed April 5, 2024.

———, 2023b. Advanced Clean Fleets Regulation Overview. Available: <https://ww2.arb.ca.gov/resources/fact-sheets/advanced-clean-fleets-regulation-overview>. Accessed October 2023.

California Energy Commission (CEC), 2021. *Draft 2022 Energy Code Multifamily and Nonresidential Compliance Manual*. Available: <https://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2022-building-energy-efficiency>. Accessed September 2022.

———, 2024. New Zero Emission Vehicle Sales in California. Available: <https://www.energy.ca.gov/data-reports/energy-almanac/zero-emission-vehicle-and-infrastructure-statistics-collection/new-zev>. Accessed May 30, 2024.

California Governor’s Office of Planning and Research, California Energy Commission, and California Natural Resources Agency (OPR et al.), 2018. *California’s Fourth Climate Change Assessment*. August 2018.

California Natural Resources Agency (CNRA), 2018. *Safeguarding California Plan: 2018 Update*. Available: <http://resources.ca.gov/docs/climate/safeguarding/update2018/safeguarding-california-plan-2018-update.pdf>. Accessed June 22, 2021.

CARB. See California Air Resources Board.

CEC. See California Energy Commission.

CNRA. See California Natural Resources Agency.

European Commission Joint Research Centre, 2018. "Climate Change Promotes the Spread of Mosquito and Tick-Borne Viruses." March 16, 2018. Available: <https://www.sciencedaily.com/releases/2018/03/180316111311.htm>. Accessed February 13, 2020.

Intergovernmental Panel on Climate Change (IPCC), 2013. *Summary for Policymakers. In Climate Change 2013: The Physical Science Basis. Contribution of Working Group I to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change*. Available: https://www.ipcc.ch/pdf/assessment-report/ar5/wg1/WGIAR5_SPM_brochure_en.pdf. Accessed January 3, 2017.

———, 2014. *Climate Change 2014 Synthesis Report, Summary for Policymakers*. Geneva, Switzerland. Available: https://www.ipcc.ch/pdf/assessment-report/ar5/syr/AR5_SYR_FINAL_SPM.pdf. Accessed January 3, 2017.

IPCC. See Intergovernmental Panel on Climate Change.

Lister, B. C., and A. Garcia, 2018. *Climate-Driven Declines in Arthropod Abundance Restructure a Rainforest Food Web*. Available: <https://www.pnas.org/content/pnas/115/44/E10397.full.pdf>. Accessed March 14, 2022.

National Oceanic and Atmospheric Administration (NOAA), 2019. *2018 Fourth Warmest Year in Continued Warming Trend, According to NASA, NOAA*. February 6, 2019. Available: <https://climate.nasa.gov/news/2841/2018-fourth-warmest-year-in-continued-warming-trend-according-to-nasa-noaa/>. Accessed February 13, 2020.

NOAA. See National Oceanic and Atmospheric Administration.

OPR et al. See California Governor's Office of Planning and Research, California Energy Commission, and California Natural Resources Agency.

SACOG. See Sacramento Area Council of Governments.

Sacramento Area Council of Governments (SACOG), 2016. *2016 Metropolitan Transportation Plan/Sustainable Communities Strategy*. Available: <https://www.sacog.org/2016-mtpscs>. Accessed December 1, 2017.

Sacramento County, 2010. *Sacramento County General Plan FEIR*. Available: <https://planning.saccounty.gov/PlansandProjectsIn->

[Progress/Documents/General%20Plan%20FEIR%20\(2030\)/General%20Plan%20Update%202030%20FEIR%20Vol%20II.pdf](#). Accessed October 4, 2023.

———, 2024 (July). County of Sacramento Climate Action Plan.

Sacramento Metropolitan Air Quality Management District (SMAQMD), 2021. CEQA Guide. Chapter 6: Greenhouse Gas Emissions. Available: <https://www.airquality.org/LandUseTransportation/Documents/Ch6GHG2-26-2021.pdf>. Accessed September 15, 2023.

SMAQMD. See Sacramento Metropolitan Air Quality Management District.

CHAPTER 8, “TRANSPORTATION”

California Governor’s Office of Planning and Research, 2018. *Technical Advisory on Evaluating Transportation Impacts in CEQA*. December 2018. Available: https://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf. Accessed April 30, 2024.

County of Sacramento. 2018. *Improvement Standards*. Available: <https://engineering.saccounty.gov/Documents/Section%204%20Street%20Design.pdf>. Accessed April 30, 2024.

County of Sacramento, 2020. *Transportation Analysis Guidelines*. September 2020. Available: <https://sacdot.saccounty.net/Documents/A%20to%20Z%20Folder/Traffic%20Analysis/Transportation%20Analysis%20Guidelines%2009.10.20.pdf>. Accessed April 30, 2024.

———, 2022a. *General Plan Circulation Element*. Prepared by Sacramento County Community Planning and Environmental Review. October 25, 2022. Available: <https://planning.saccounty.gov/PlansandProjectsIn-Progress/Documents/General%20Plan%20Amendments/Circulation%20Element%20-%20Amended%2010-25-22.pdf>. First adopted December 15, 1993. Last amended October 25, 2022.

———, 2022b. *Sacramento County Active Transportation Plan*. June 2022. Available: <https://planning.saccounty.gov/PlansandProjectsIn-Progress/Documents/Sacramento%20County%20Active%20Transportation%20Plan.pdf>. Accessed: April 30, 2024.

———, 2022c. *Sacramento Countywide Design Guidelines and Case Studies*. September 2022. Available: https://planning.saccounty.gov/applicants/Documents/DesignReview/Countywide_Design_Guidelines_9.9.22.pdf. Accessed April 30, 2024.

———, 2024a. *Oversized Trucking (Transportation) Permit*. Available: <https://sacdot.saccounty.net/Pages/OversizedTruckingPermit.aspx>. Accessed May 2, 2024.

———, 2024b. *Traffic Control Plans and Detour Plans*. Available: <https://sacdot.saccounty.net/Pages/TrafficControlPlansandDetourPlans.aspx>. Accessed May 2, 2024.

OPR. See California Governor’s Office of Planning and Research.

Sacramento Council of Governments (SACOG), 2022. *Sacramento Region Trail Network Action Plan*. August 2022. Available: <https://www.sacog.org/home/showpublisheddocument/112/638368666018130000>. Accessed April 30, 2024.

———, 2023. *2023 Regional Active Transportation Program*. June 2023. Available: <https://www.sacog.org/home/showpublisheddocument/1094/638236515565670000>. Accessed April 30, 2024. SACOG. See Sacramento Council of Governments.

SACOG. See Sacramento Council of Governments.

Sacramento Regional Transit District (SacRT), 2022. *Ridership Report*. December 2022. Available: https://www.sacrt.com/wp-content/uploads/4th_Quarter_2022.pdf. Accessed June 27, 2024.

———, 2024. *SacRT System Profile*. Available: <https://www.sacrt.com/about/r/>. Accessed April 30, 2024.

SacRT. See Sacramento Regional Transit District.

CHAPTER 9, “SUMMARY OF IMPACTS AND THEIR DISPOSITION”

Intergovernmental Panel on Climate Change (IPCC), 2014. *Climate Change 2014 Synthesis Report, Summary for Policymakers*. Geneva, Switzerland. Available: https://www.ipcc.ch/pdf/assessment-report/ar5/syr/AR5_SYR_FINAL_SPM.pdf. Accessed January 3, 2017.

Sacramento Area Council of Governments (SACOG), 2019. *Draft Environmental Impact Report for the 2020 Metropolitan Transportation Plan/Sustainable Communities Strategy*. State Clearinghouse No. 2019049139. September 2019.

11 ACKNOWLEDGEMENTS

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APPENDIX A

NOP AND COMMENTS



NOTICE OF PREPARATION OF A SUBSEQUENT ENVIRONMENTAL IMPACT REPORT AND PUBLIC SCOPING MEETING FOR THE SACRAMENTO COUNTY CLIMATE ACTION PLAN

December 14, 2023

To: State Clearinghouse, Responsible and Trustee Agencies, Interested Parties, and Organizations

Lead Agency: Sacramento County

Contact: Todd Smith, Planning Director
Planning and Environmental Review
827 7th Street, Room 225
Sacramento, CA 95814
(916) 874-6918 (direct)
smithtodd@saccounty.gov

Comment Period: December 14, 2023 to January 31, 2024

Sacramento County (hereafter the County) is preparing a Climate Action Plan (CAP). The CAP is intended to serve as mitigation for climate change impacts of the County's 2030 General Plan, as provided by Mitigation Measure (MM) CC-2 in the 2030 General Plan EIR (SCH # 2007082086). As the lead agency, the County will prepare a focused Subsequent Environmental Impact Report (SEIR) for the CAP that will tier from the certified 2030 General Plan EIR (SCH # 2007082086) and will evaluate whether implementation of the CAP would result in new or substantially more severe significant impacts than the impacts disclosed in the 2030 General Plan EIR.

The County is issuing this Notice of Preparation (NOP) per Section 15082 of the California Environmental Quality Act (CEQA) Guidelines. The purpose of this NOP is to provide agencies, interested parties, and organizations with sufficient information describing the proposed CAP and the potential environmental effects to enable meaningful input on the scope and content of environmental information to be included in the SEIR. The SEIR will evaluate the potential direct, indirect, and cumulative environmental impacts of implementing the CAP and identify feasible mitigation measures or alternatives that may lessen or avoid any significant impacts. Comments received during this public comment period will be used to focus the environmental analyses in the SEIR.

PUBLIC REVIEW PERIOD AND SCOPING MEETING

This NOP is available for public review and comment beginning December 14, 2023 and ending on January 31, 2024. Copies of this NOP may be reviewed in the Planning and Environmental Review department at the address provided above. Project materials, including this NOP, are also available online at:

<https://planning.saccounty.gov/PlansandProjectsIn-Progress/Pages/CAP.aspx>.

The County will hold a public scoping meeting to inform interested parties about the CAP and provide agencies and the public with an opportunity to submit comments on the scope and content of the environmental information to be included in the SEIR. The public scoping meeting will be conducted virtually on January 10, 2024 from 2:00 to 3:00 pm.

To register for virtual attendance (computer or phone) visit:

Link: <https://saccounty-net.zoomgov.com/j/1606035655?pwd=Y2lwZEZmS0U4T3ppM3M3by9RK3FpZz09>

Meeting ID: 160 603 5655

Passcode: 136188

Any interested person may appear at the public hearing virtually, by either Zoom meeting or telephone. If you have any questions regarding the scoping meeting, contact Todd Smith at (916) 874-6918 or smithtodd@saccounty.gov.

PROVIDING COMMENTS ON THIS NOTICE OF PREPARATION

Comments and suggestions as to the appropriate scope of analysis in the SEIR are invited from all interested parties. Written and/or email comments or questions concerning the SEIR should be directed to CEQA@saccounty.gov. Comments should be provided at the earliest possible date but must be received by **5:00 p.m. on January 31, 2024**. Please include the commenter's full name and address.

Focus of Input

Agencies should comment on the scope and content of the environmental information that is germane to the agencies' statutory responsibilities in connection with the proposed project. Comments and suggestions provided during the NOP public review process should focus on the following topics:

Scope of Environmental Analysis. Guidance on the scope of analysis for this SEIR, including identification of specific issues that will require closer study due to the location, scale, and character of the activities required to implement the greenhouse gas (GHG) reduction measures in the CAP and achieve established thresholds.

Mitigation Measures. Ideas for feasible mitigation measures, including mitigation that could be imposed by the County as CEQA lead agency and that would avoid, minimize, or reduce potentially significant impacts of implementing the GHG reduction measures in the CAP.

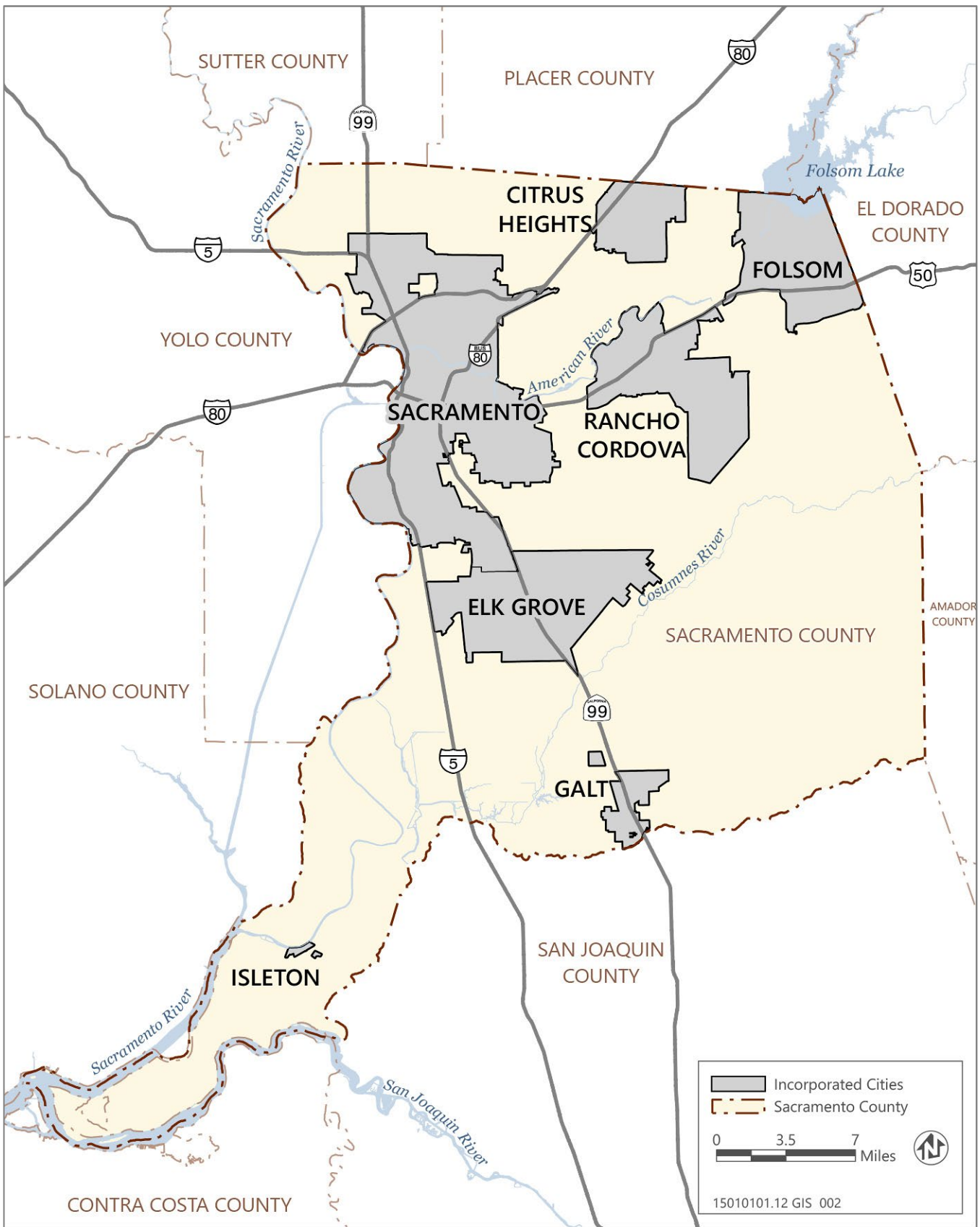
Alternatives. Suggestions for alternatives to the proposed CAP, and the GHG reduction measures contained therein, that could avoid or substantially lessen potentially significant impacts.

Interested Parties. Identification of public agencies, public and private groups, and individuals that the County should notice regarding the proposed CAP and accompanying SEIR.

PROJECT OVERVIEW

Location

The CAP would apply to existing and proposed development in unincorporated Sacramento County, which encompasses approximately 496,083 acres or 775 square miles, and County operations. Sacramento County is in the northern portion of California's Central Valley. As shown in Figure 1, it extends from the delta formed at the confluence of the Sacramento and San Joaquin Rivers in the southwest to Folsom Lake and the Sierra Nevada foothills in the northeast. It is bordered by eight counties: El Dorado, Amador, San Joaquin, Contra Costa, Solano, Yolo, Sutter, and Placer. Interstates 5 and 80, State Route 99, and U.S. Highway 50 provide regional access. The incorporated areas within the county (including the cities of Sacramento, Citrus Heights, Folsom, Rancho Cordova, Galt, Elk Grove, and Isleton) would not be subject to the proposed CAP.



Source: Adapted by Ascent Environmental in 2021.

Figure 1 Regional Location

Control Number PLNP2016-00063

Project Background

Land use and planning decisions within unincorporated Sacramento County are guided by the County's 2030 General Plan. The last update to the General Plan began in 2002 and concluded in November 2011. The County's 2030 General Plan EIR evaluated the environmental effects of growth consistent with the 2030 General Plan and identified a significant impact associated with GHG emissions. Two mitigation measures were adopted to address this impact: MM CC-1 modified the 2030 General Plan to include Policy LU-115 which identified a goal to help achieve the state's then-current goal of reducing GHG emissions to 1990 levels by the year 2020 (per Assembly Bill [AB] 32, the Global Warming Solutions Act of 2006). No further action related to MM CC-1 is required. MM CC-2 requires preparation of a CAP and specifies implementation measures, including when the County must adopt a CAP, what elements the CAP must contain, and how often the County shall complete an inventory of GHG emissions. MM CC-2 was incorporated into the General Plan as Implementation Measures F, G, H, I, and J (General Plan Land Use Element, page 125).

The County implemented MM-CC-2 in several phases. On November 9, 2011, the County Board of Supervisors adopted the *Climate Action Plan – Strategy and Framework Document*, which presented a framework for reducing GHG emissions and an overall strategy to address climate change. On September 11, 2012, the Board of Supervisors adopted the *Climate Action Plan – Government Operations*, which quantified GHG emissions from the County's operations (e.g., County-owned facilities, vehicles, and equipment) and identified measures to reduce these emissions.

The County began work on a comprehensive CAP in 2016, which would supersede the 2011 and 2012 documents. This CAP would update the unincorporated County's GHG inventory and forecasts, identify the required GHG reduction targets, and propose measures to achieve the required GHG reductions for the entire county. Additionally, to prepare for climate change impacts (e.g., impacts related to precipitation, flooding, heat waves, wildfires, air quality, water supply, water quality, natural ecosystems, and agriculture), this CAP would include preparation of a vulnerability assessment and an adaptation strategy.

Several drafts of the comprehensive CAP were circulated for public review in 2021 and 2022. The County continues to refine the CAP in response to stakeholder input. The proposed 2024 CAP would build upon the County's ongoing efforts to address climate change by refining the Final CAP released in August of 2022. The 2024 CAP will identify new GHG emission reduction targets based on the most recently adopted State legislation, modify GHG emission reduction measures (from those previously circulated for public review), and improve alignment of the CAP with recent changes in State regulations including the 2022 Climate Change Scoping Plan. The 2024 CAP will be developed to serve as a qualified GHG reduction plan used for programmatic tiering per CEQA Guidelines Sections 15064.4(b)(3) and 15183.5(b).

Project Description

The overall objective of the 2024 CAP is to reduce GHG emissions generated from activities within the unincorporated county (community) and GHG emissions generated by County facilities and operational activities throughout the county, including facilities and operations located within incorporated cities, to meet or exceed GHG reduction goals under State laws. The CAP will establish a GHG emissions reduction strategy informed by a baseline inventory and forecast emissions, and establish a strategy for adapting to the impacts of climate change, as described below.

Baseline and Forecast Greenhouse Gas Emissions

Inventory

The County has prepared a Community Inventory and a Government Operations Inventory that provide a snapshot of the major sources of emissions in a single year, while also providing a baseline from which emission trends are projected. The Community Inventory and Government Operations Inventory utilize data from the year 2021, as it was the most recently available complete data year at the time of preparation. The 2021 Community-wide GHG emissions inventory was developed using the U.S. Community Protocol for Accounting and Reporting of Greenhouse Gas Emissions (Community Protocol) version 1.2 (July 2019) developed by Local Governments for Sustainability (ICLEI). The 2021 Government Operations GHG emissions inventory was developed using the ICLEI Local Government Operations Protocol (LGO Protocol), version 1.1 (May 2010) developed by ICLEI.

Forecasts

GHG emissions forecasts provide an estimate of future GHG emissions levels based on a continuation of current trends in activity, population and job growth, and relevant regulatory actions by federal, state, and regional agencies (i.e., "legislative" actions) that have been adopted. Emissions forecasts provide insight into the scale of local reductions needed to achieve GHG emission reduction targets.

Using population, employment, and housing data, the results from the 2021 baseline year inventory, emissions will be forecast to 2045 for consistency with the target year for the CAP. Growth projections will be based on the Sacramento Area Council of Governments' 2020 Metropolitan Transportation Plan/Sustainable Communities Strategy, augmented as necessary to reflect in-process and reasonably foreseeable growth not captured in the 2020 Metropolitan Transportation Plan/Sustainable Communities Strategy growth projections.

Emissions Gap

The inventory and forecasts are used to develop reduction targets consistent with State mandates. The emissions gap, if any, between forecasted emissions and reduction targets serves as the foundation to determine the strategies and measures needed to reduce GHG emissions to meet the County's target.

Greenhouse Gas Reduction Targets

The 2024 CAP is intended to serve as the County's qualified plan for the reduction of GHG emissions in accordance with Section 15183.5 of the CEQA Guidelines. This requires that the plan establish a level, based on substantial evidence, below which the contribution to GHG emissions from activities covered by the plan would not be cumulatively considerable. The GHG reduction targets will be based on the most current State legislation (e.g., AB 1279) and planning documents (e.g., the California Air Resources Board's 2022 Scoping Plan).

Greenhouse Gas Reduction Strategy

The 2024 CAP will include a GHG reduction strategy that includes both quantified and non-quantified measures that are based on the 2022 Final CAP, which was circulated for public review but not approved by the County. However, GHG reduction measures may be revised, expanded, or replaced from those previously circulated for public reviews. To meet the requirements of CEQA Guidelines Section 15183.5 and the requirements of MM CC-2, the GHG reduction measures in the 2024 CAP will provide clear and specific implementation components for each of the measures. This will provide evidence that GHG reduction measures can be implemented, monitored, and enforced (where applicable), with clear pathways and metrics for achieving a determined GHG reduction level within the timeline of established targets.

Each GHG reduction measure will clearly identify the appropriate mechanism or vehicle for implementation, including whether the County will need to create a new program or modify an existing program, and whether the development of an ordinance or regulation subsequent to CAP adoption is appropriate to guide and enforce implementation. Not all measures in the CAP will be enforceable through an ordinance; non-regulatory or voluntary programs can be effective in mitigating GHG emissions and can be monitored for effectiveness and quantified reductions. A CAP Consistency Checklist will be required to enforce implementation of applicable GHG reduction measures on projects that wish to utilize the CEQA streamlining benefits of the 2024 CAP for their project-specific GHG impact analysis. Each GHG reduction measure will have a performance standard that will measure the success of a program or that equates to a long-term emissions reduction supported by substantial evidence.

In addition, each measure will include a clear timeline of implementation to support the GHG reductions that can be achieved within the CAP reduction target timeframe. This may include the year by which an ordinance would be adopted or becomes effective, a program established, or an outreach campaign planned and executed. For longer-term measures that include interdependent actions, require further evaluation or study, or currently lack funding sources, the measure will include estimated milestone dates by which certain implementing actions or phases would be completed, particularly when specific implementation details cannot be specified prior to consideration of the 2024 CAP for adoption.

Finally, each measure would include an action to develop a funding mechanism or identify a potential grant funding or financing source. The requirements of MM CC-2 state that an economic analysis must be performed for each GHG reduction measure. A Cost Analysis and Funding Strategy will be completed that will provide an economic analysis detailing a cost-benefit analysis to allow prioritization of near-term reduction measures and actions. The economic analysis will also analyze the County's needs for hiring additional staff to support implementation, as well as costs and funding and financing mechanisms. All costs would be provided as a cost to the County for measure implementation.

Climate Change Adaptation Strategy

This section describes the adaptation framework and presents measures that the County would take to address climate vulnerabilities and increase countywide resiliency, based on the results of the Climate Change Vulnerability Assessment performed for the unincorporated county. The adaptation measures set forth a strategy for the County to prepare for increased: temperatures and extreme heat days, risk of wildfire, drought, flooding, and sea level rise. Many climate adaptation measures may also reduce GHG emissions, improve public health, and achieve other co-benefits that further the County's sustainability and environmental justice goals and improve community resilience.

INTENDED USES OF THE EIR

The 2030 General Plan EIR includes a preliminary analysis of the potential effects of implementing MM CC-1 and MM CC-2 in Chapter 12, "Climate Change." In concert with state and federal activities, this mitigation is intended to offset the cumulatively significant climate change impact associated with implementation of the 2030 General Plan. The evaluation notes that although "the Climate Action Plan is intended to benefit the County in a variety of ways, there are potential negative physical consequences associated with implementation" (p. 12-33) and provides several specific examples.

As such, consistent with the requirement of CEQA Guidelines Sections 15162 and 15168, the County is preparing a subsequent program EIR (SEIR) that evaluates the scope of actions proposed under the CAP. CEQA Guidelines sections 15162 through 15164 set forth the requirements for additional environmental review when there is a previously certified EIR covering the project for which a subsequent discretionary action is required. Section 15168 sets forth the requirements for preparing a program EIR. The SEIR is appropriate because it is supplementing the analysis prepared in the 2030 General Plan EIR which was also a program EIR.

The County is the CEQA lead agency responsible for adoption and implementation of the proposed 2024 CAP. As the lead agency, the County is responsible for considering the adequacy of the supplemental environmental review before determining if the overall project should be adopted.

POTENTIAL ENVIRONMENTAL EFFECTS

The SEIR will describe existing conditions and evaluate the potential environmental effects of the 2024 CAP and a reasonable range of alternatives to the proposed plan, including a no-project alternative. The SEIR will address direct, indirect, and cumulative effects and will also discuss potential growth-inducing impacts. In accordance with CEQA Guidelines Section 15162, the evaluation of potential environmental effects in the SEIR will focus on whether the CAP would result in any new or substantially more severe significant impacts compared to those identified in the certified 2030 General Plan EIR. Lastly, the SEIR will identify feasible mitigation measures, if available, to reduce potentially significant impacts of implementing the specific GHG reduction measures identified in the CAP. At this time, the County has determined that the CAP could result in new or substantially more severe significant effects on the resource areas described below. Other environmental resources will be discussed at a lesser level of detail to substantiate the determination that no new or more severe impacts would occur.

Air Quality

This section of the SEIR will evaluate whether additional emissions would occur due to implementation of the 2024 CAP that were not evaluated in the certified 2030 General Plan EIR and will identify any revisions to mitigation measures or additional mitigation measures that would be necessary to avoid or reduce impacts. A qualitative, programmatic analysis of the potential impacts of implementing the identified GHG reduction measures will be conducted, consistent with requirements of State CEQA Guidelines Section 15168.

Biological Resources

This section of the SEIR will evaluate whether implementation of the proposed 2024 CAP would result in any new or more severe significant impacts to special-status species and/or habitat beyond those identified in the 2030 General Plan EIR and will identify any necessary mitigation measures to avoid or reduce impacts. A qualitative, programmatic analysis of the potential impacts of implementing the identified GHG reduction measures will be conducted, consistent with requirements of State CEQA Guidelines Section 15168.

Energy

This section will describe existing energy production and consumption within the county, including existing energy facilities and services in the county provided by the Sacramento Municipal Utility District and Pacific Gas and Electric and a profile of energy consumption in the county, consistent with the energy analysis completed for the CAP. The existing setting will also describe federal, state, and local regulations related to energy consumption, energy efficiency, and/or energy conservation.

The energy analysis will address potential energy use (or savings) associated with GHG reduction measures including electricity, natural gas, and transportation fuel consumption. Because an overarching goal of the CAP will be to reduce energy consumption, improve energy efficiency, and increase renewable energy supply, significant energy impacts are not anticipated. However, if potential impacts are identified, mitigation measures will be recommended to ensure compliance with applicable plans or programs with the intent to conserve energy. The analysis will also evaluate any potential impacts to energy infrastructure facilities.

Greenhouse Gas Emissions

This section of the SEIR will include a quantitative analysis of greenhouse gas emissions from all sectors (e.g., building energy, mobile, water and wastewater, solid waste) to assess the potential for construction- and operation-related greenhouse gas impacts. Consistent with the requirements of the State CEQA Guidelines Section 15168, the analysis will provide a program-level discussion of the impacts of implementation the CAP. Because an overarching goal of the CAP will be to reduce GHG emissions as described in MM CC-2, New or more severe GHG impacts are not anticipated.

Transportation

Senate Bill 743, which took effect on July 1, 2020, eliminated the use of automobile delay/level of service under CEQA and identified vehicle miles traveled (VMT) as generally being the most appropriate measure of evaluating transportation impacts (CEQA Guidelines section 15064.3). The SEIR will include analysis of VMT in accordance with Senate Bill 743. Additionally, the SEIR will include an evaluation of impacts on current programs, plans, ordinances, and policies addressing the circulation system (including transit, roadway, bicycle, and pedestrian facilities). This section will describe current VMT, bicycle, pedestrian, transit, and safety policies and standards of the County. The analysis will focus on GHG reduction measures associated with transportation and their relationship with current County VMT thresholds. The SEIR will identify any additional mitigation measures necessary to reduce new or more severe significant transportation impacts.

Tribal Cultural Resources

Tribal cultural resources were established as a new class of resources under CEQA by AB 52, which became effective on July 1, 2015. Because AB 52 was enacted after certification of the 2030 General Plan EIR, impacts on tribal cultural resources were not evaluated in that document. As such, the SEIR will include an analysis of potential tribal cultural resources impacts.

From: [Newton, Julie](#)
To: [Smith, Todd](#)
Subject: FW: Sac Co CAP, SEIR NOP: Scoping. Comment (350 Sacramento, 1/9/24)
Date: Friday, January 12, 2024 9:48:14 AM


From: PER-CEQA <CEQA@saccounty.gov>
Sent: Friday, January 12, 2024 9:31 AM
To: Newton, Julie <newtonj@saccounty.gov>; Messerschmitt, Kevin <messerschmittk@saccounty.gov>; Little, Alison <littlea@saccounty.gov>
Subject: FW: Sac Co CAP, SEIR NOP: Scoping. Comment (350 Sacramento, 1/9/24)

Andrea Guerra, Senior Office Assistant

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www.planning.saccounty.gov



Planning and Environmental Review has several customer service options available and appointments can be made for most services. Please see our website at planning.saccounty.gov for the most current information on how to obtain services including office and public counter hours.

 Please consider the environment before printing this email

From: Oscar Balaguer <oscarbal@hotmail.com>
Sent: Friday, January 12, 2024 9:03 AM
To: PER-CEQA <CEQA@saccounty.gov>
Cc: Steve Wirtz <wirtzsjw@aol.com>; Susan Herre <susanherre@gmail.com>; Ralph Propper <rpropper47@icloud.com>; Kent Lacin <kent@lacin.com>; Ann Amato <anngarden4@gmail.com>; Barbara Leary <barbaraleary@comcast.net>; Elizabeth Barrett <condosanders@yahoo.com>; Rick Codina <coyote1@surewest.net>; Laurie Rivlin Heller <laurierivlinheller@gmail.com>
Subject: Re: Sac Co CAP, SEIR NOP: Scoping. Comment (350 Sacramento, 1/9/24)

EXTERNAL EMAIL: If unknown sender, **do not** click links/attachments.
If you have concerns about this email, please report it via the Phish Alert button.

Dear CEQA Administrator,
Please note that in the subject letter, on page 9, bottom paragraph, reference to §21094(e) (4) is incorrect.
Thank you.

From: Oscar Balaguer <oscarbal@hotmail.com>

Sent: Wednesday, January 10, 2024 9:13 AM

To: CEQA@saccounty.gov <CEQA@saccounty.gov>

Cc: Steve Wirtz <wirtzsjw@aol.com>; Susan Herre <susanherre@gmail.com>; Ralph Propper <rpropper47@icloud.com>; Kent Lacin <kent@lacin.com>; Ann Amato <anngarden4@gmail.com>; Barbara Leary <barbaraleary@comcast.net>; Elizabeth Barrett <condosanders@yahoo.com>; Rick Codina <coyote1@surewest.net>; Laurie Rivlin Heller <laurierivlinheller@gmail.com>

Subject: Sac Co CAP, SEIR NOP: Scoping. Comment

CEQA@saccounty.gov.

Dear CEQA Administrator,

Pease find attached 350 Sacramento's comments on the subject SEIR.

Thank you very much



January 9, 2024

Mr. Todd Smith, Director
Sacramento County Planning and Environmental Review
827 7th Street,
Sacramento, CA 95814,

Via Email Only: CEQA@sacounty.gov.

SACRAMENTO COUNTY, DRAFT CAP REVISE: RESPONSE TO NOP

Dear Todd,

Bill McKibben famously observed in regard to climate change, “winning slow is losing”. 350 Sacramento (350 Sac) appreciates the opportunity to provide scoping suggestions for a revised draft of the County’s Climate Action Plan (CAP) and associated Supplemental EIR (SEIR). We are gratified that, based on the consultant’s scope of work (Consultant Scope),¹ the County has seen fit to address eight of 350 Sac’s long-standing concerns,² including by preparing the SEIR. However, over twelve years have passed since the County obligated itself to adopt a CAP “within a year”, and almost four years since supervisors formally initiated the CAP. We hope the NOP and this re-draft will lead to an effective, CEQA compliant CAP. The timing of the NOP seems irregular,³ and we hope any resulting delay will be minimal.

Our comments are organized as follows (hyperlinks aid navigation)

- I. [Project Background](#)
- II. [Comments on NOP](#)
- III. [County-Identified Alternatives](#)
- IV. [Proposed “Smart Growth” Alternative](#)
- V. [Application of CAP to Future Plans](#)

I. PROJECT BACKGROUND

In connection with its 2011 general plan update (GPU), the County committed to implementing a number of greenhouse gas (GHG) mitigation measures, including adopting a CAP “within a year”. Almost none of the measures have been accomplished to date, including CAP adoption. ATTACHMENT 1 reviews the County’s 2011 commitments and their implementation status.

The County formally initiated the CAP in 2020 at the urging of 350 Sac and others. Since then,

¹ Sacramento County. Sacramento County Climate Action Plan - Scope of Work and Schedule for Revisions and Technical Updates - June 2023. June 2023. Online: https://drive.google.com/file/d/1HNx900T6l-H0tMmw_sawB35seYa4SJAa/view?usp=sharing

² 350 Sac. Fact Sheet 7, County Progress In Addressing Draft CAP Deficiencies. November 2023. Online: <https://drive.google.com/file/d/1UdGqJwnSAiaNI28v1S65YN6-Fg-oS7uq/view?usp=sharing>.

³ CEQA Guidelines §15082 requires the NOP “immediately after deciding that an environmental impact report is required”; per the Consultant Scope this was known by June 2023.

the County has published five draft CAPs (four public, one administrative and shared with stakeholders). All were critiqued by 350 Sac,⁴ and others as, among other things, lacking measures substantiated as feasible, effective, and enforceable; and using an inappropriate environmental document. Our September 27, 2022 letter collates and updates comments to that date. We here incorporate all our prior comments by reference.

At a contentious September 27, 2022 hearing, supervisors declined to adopt a proposed final CAP. They directed certain revisions and that the item be returned to a December 6, 2022 Board meeting. It was not, and the current proposed revise continues the previous work. ATTACHMENT 2 provides a timeline of CAP development to date.

II. COMMENTS ON NOP

Our comments in this section are organized as follows:

- | | |
|---|---|
| A. EDITORIAL COMMENTS | E. POTENTIAL ENV EFFECTS |
| B. PROJECT BACKGROUND | F. SPRAWL MITIGATION IS UNSUPPORTED |
| C. REVISE SCS FORCASTS | G. IMPL MONITORING AND REPORTING |
| D. GHG REDUCTION STRATEGY | H. REQUEST TECHNICAL REPORTS |

A. EDITORIAL COMMENTS

1. **Table of Contents.** We're gratified that the SEIR will include a table of contents (Consultant Scope, p.11), and request that the revised CAP also include a complete table of contents, unlike previous versions. We also suggest that in both documents the listings be hyperlinked to their respective text sections to aid navigation, as is common nowadays.
2. **CAP Status.** Several references to the current and previous draft CAP could confuse readers as to the CAPs adoption status. , e.g., "...2022 Final CAP" (p. 8); "...update the CAP" (p. 9); "...Revised CAP" (pp.11); "...County's current CAP" (p. 11). These statements might imply that a communitywide CAP has been adopted, which is incorrect. To avoid ambiguity, we suggest future documents consistently add the modifier "draft"; and use the verb "revise" rather than "update".

⁴ [350 Sacramento \(350 Sac\), ECOS, Sierra Club. July 16, 2020.](#)
[350 Sac, September 25, 2020.](#)
[350 Sac, November 19, 2020.](#)
[350 Sac, January 18, 2021.](#)
[350 Sac, ECOS, March 23, 2021.](#)
[350 Sac, April 9, 2021.](#)
[350 Sac, October 8, 2021.](#)
[350 Sac, March 23, 2022.](#)
[350 Sac, September 27, 2022.](#)
[350 Sac, October 11, 2022.](#)
[350 Sac, August 3, 2023.](#)

B. PROJECT BACKGROUND (NOP p. 4 ff)

1. The CAP's History.

"The County implemented MM-CC-2 in several phases.... On September 11, 2012, the Board of Supervisors adopted the Climate Action Plan – Government Operations" ... "The County began work on a comprehensive CAP in 2016..." (both, NOP p. 4).

- a) Government Operations. The Government Operations CAP is not an element of mitigation measure MM-CC-2, so it appears incorrect to say it implements that measure.
- b) Work History. The County has not worked on the CAP since 2016 with any continuity, as might be implied. Staff made an abortive attempt to get the CAP off the ground in 2016, reaching out to stakeholders, and presenting supervisors with an updated GHG Inventory and sample mitigation measures at a May 2017 workshop. Supervisors did not direct staff to continue work, and no further work products were issued until after April 7, 2020, when Supervisors directed CAP initiation (see ATTACHMENT 2).

2. The Project's Purpose. Confusion as to project purpose could be problematic because it would influence the selection of alternatives. The NOP variously states:

- *"The CAP is intended to serve as mitigation for climate change impacts of the County's 2030 General Plan, as provided by Mitigation Measure (MM) CC-2 in the 2030 General Plan EIR (SCH # 2007082086)"* (p. 1).
- *"The overall objective of the 2024 CAP is to reduce GHG emissions generated from ... the unincorporated county (community) and ... County facilities ... to meet or exceed GHG reduction goals under State laws"* (p. 4).

Both statements are accurate as far as they go, and we suggest that one be chosen or their key features be combined. A possible formulation is:

The purpose of the CAP is to reduce GHG emissions from the unincorporated county, meeting or exceeding State GHG reduction goals to mitigate climate change impacts of the County's 2030 General Plan, as specified in Mitigation Measure CC-2 in the 2030 General Plan EIR (SCH # 2007082086)"

C. GHG EMISSIONS – REVISE SCS PROJECTIONS (NOP p.4 ff.)

"Growth projections will be based on [SACOG's SCS] ...augmented as necessary to reflect in-process and reasonably foreseeable growth not captured in the 2020 ...[SCS]" (p. 5).

The rationale for deviating from the 2020 SCS, and any available 2025 draft SCS projections, should be clearly explained. The SEIR should analyze the potential effects of any such deviations on achievement of the SCS's mandated "vehicle miles traveled" (VMT)-reduction goals; and other secondary and cumulative environmental impacts should be identified (see also comment II.E.2 re potential plan conflicts).

D. GREENHOUSE GAS REDUCTION STRATEGY (NOP p.5)

1. **Measure Substantiation.** We appreciate the statements in this section relating to substantiating compliance with CEQA requirements and the County's 2011 CAP commitments.

2. **Voluntary Programs**

"...voluntary programs can be effective ... and can be monitored for effectiveness and quantified reductions..." (NOP p. 5).

We agree in principle. However, such measures need to be substantiated as effective and practicably enforceable on the County through adoption in the CAP. They will need clear, meaningful, detailed performance criteria and monitoring parameters, documented in a checklist or comparable format, to allow timely tracking and modification if needed.

3. **Scheduling**

"...each measure will include a clear timeline of implementation.... This may include the year... longer-term measures...will include estimated milestone dates by which...actions...would be completed, particularly when... details cannot be specified prior to...CAP...adoption" (p. 5).

This statement raises uncertainty that scheduling will be detailed enough to substantiate CAP measures. Detailed timelines are critical for successful, timely implantation of complex programs such as the CAP' with inter-related and chronologically over-lapping tasks. Detailed scheduling, showing discrete, defined tasks, start and end dates, and task relationships allows efficient work sequencing, resource allocation, progress tracking and reporting; and provides a management a tool to avoid or address scheduling conflicts and setbacks. Nowadays, project management software makes it easy to create and use timelines. But careful planning is needed to ensure that the implementation scheme is both ambitious and realistic, and to ensure and demonstrate that the agency can feasibly complete the work as scheduled. A single end-point target date for measures is inadequate to inform management decisions and to provide accountability.

- a) **Implementing Activities.** We are gratified that, *"Ascent recommends assigning one or more implementing actions to each measure to define how ...[it] will be implemented... consistent with any performance standards, timing, and enforcement mechanism defined in Task 4.1"* (Consultant Scope, Task 4.2).
- b) Implementing, *"details [which] cannot be specified prior to...CAP...adoption"* should be avoided. The point of an "Action" plan is to provide decision makers and the public with measures which are actionable, not deferred. If any such detail cannot be avoided, it needs to be clearly justified as such, and the pathway and timeline for resolving such details documented and committed to consistent with Guidelines §15126.4(a)(1)(B), as part of the implementation scheme,.
- c) To support timely implementation, consistent with MM CC-2's "detailed" provision, each measure should be broken down into logical constituent tasks, with start and completion dates, expected products, and critical path relationships indicated. Consistent with professional-level project-management principles, activities should be of short duration and limited scope, to allow efficient, timely management,

- tracking, and problem-solving.
- b) Short-term measures, scheduled for accomplishment within two years; and near-term activities for longer-term measures, should include the year and month in which actions will be initiated and completed.
 - c) Longer term actions should be adequately conceptualized, with needed antecedent and supporting actions documented and realistic timeframes identified.
 - d) Schedules should be formally reviewed for update at least annually, in connection with the reporting schedule, to adjust for early or late task completion; and to further detail longer-term measures as their implementing activities come within the two-year time-frame
4. **Sequestration Targets.** The County's Consultant Scope, Task 3.2. notes that AB 1279 establishes a state 2045 GHG emissions goal of net zero/85% reduction, raising the possibility that up to 15 percent of the CAP's mitigation burden could be met through atmospheric drawdown. The County has strong regulatory authority over land use, and very little over natural and working lands management. We support restoring natural sequestration, but have previously provided,⁵ and here augment,⁶ difficulties in substantiating the effectiveness of a voluntary "carbon farming" program. We therefore encourage the County to focus on measures best aligned with its authorities.

In the context of natural sequestration, the County should use its land use authority to avoid loss of carbon stored on Sacramento County natural grassland and other soils, by maximum avoidance of construction-related disturbance. The more the County reduces emissions clearly within its control, especially by avoidance, the less it need consider unlikely re-capture of carbon released through County-permitted activities. Please see further discussion at ATTACHMENT 3. The GPU did not evaluate soil carbon losses from greenfield development whose GHG emissions would be governed by the CAP, and the SEIR should do so.

E. POTENTIAL ENVIRONMENTAL EFFECTS (NOP p. 6 ff.)

"... the SEIR will focus on whether the CAP would result in any new or substantially more severe significant impacts compared to those identified in the certified 2030 General Plan EIR" (NOP p. 6)

1. **Increased Significance of Impacts.** CAP-related GHG impacts may "be substantially more severe" now than when they were reviewed for the 2011 GPU, because targets under SB 32 and AB 1279 are substantially more stringent than those in effect in 2011 under AB 32.
2. **Standard of SEIR Analysis.**

"Consistent with the requirements of ... CEQA Guidelines Section 15168, the analysis will provide a program-level discussion of the impacts of implementation the CAP" (NOP, p. 7).

⁵ 350 Sac, October 8, 2021, pp. 23-25.

⁶ Julie Creswell. Companies' Climate Promises Face a Wild Card: Farmers. NY Times, July 9, 2022. Online: <https://www.nytimes.com/2022/07/09/business/farmers-climate-change.html>

Guidelines §15168 pertains to projects consistent with a community plan or zoning. Section 15183.5 refers more specifically to programmatic greenhouse gas reduction plans, e.g., CAPs. Reducing GHGs is best addressed at the program level, where fundamental land-use and other policy options not available during project-level review can be considered.

Pursuant to §15183.5(b)(1)(D), CAP measures must also demonstrate they would achieve the CAP's emission targets if implemented on a *"project-by project basis"*. This project-level specificity is reflected in the NOP's recognition that, to allow CEQA streamlining under the CAP, *"Each GHG reduction measure will have a performance standard"*, and an associated, *"CAP Consistency Checklist will be required to enforce implementation"* of the project-level performance standard through project-level permitting (both, NOP, p. 5). This requirement for enforceable project-level measures is perhaps unique among CEQA-regulated programmatic plans. To the extent that the CAP's measures are meant to be relied on for, and will streamline and supplant, subsequent project-level CEQA review, they require project-level environmental analysis.

3. **Air Quality Impacts** (NOP, p. 6). The CAP could facilitate approval of greenfield projects outside the County's adopted Urban Policy Area (UPA) and Urban Services Boundary (USB), requiring general plan amendments (GPA's). Such GPA projects include the Upper West Side and Grandpark developments currently in planning. Both projects are remote from existing urbanization, in a land use pattern known to induce on-road automobile traffic. The SEIR should discuss the CAP's potential secondary impacts to air quality from foreseeable emissions of priority pollutants from induced traffic.
4. **Loss of Sequestered Soil Carbon.** Soil disturbance, including from urban development, results in oxidation and release to the atmosphere of sequestered soil carbon, as discussed in comment II.D.4 above and attachment 3. The SEIR should analyze resulting soil carbon emissions.
5. **Conflicts with Existing Plans.** CEQA Guidelines §15125(d) requires that the SEIR discuss any inconsistencies with other plans. Any such inconsistencies are now unknown, but based on past draft CAPs, and information provided in the Consultant Scope and the NOP, the following may be possible:
 - a) Inconsistencies with GPU policy LU-3.
 - b) Inconsistencies with Phase 1 CAP
 - c) Inconsistencies with SACOG's SCS.
6. **Unexamined Excess Entitlements.** Per our previous comments,⁷ the County has entitled far more DU's than needed to accommodate expected growth, and plans to approve many more.⁸ Such excess entitlements, far exceeding market demand, appear

⁷ [350 Sac, April 9, 2021](#), p. 2.
[350 Sac, October 8, 2021](#), p. 11.
[350 Sac, Comment Letter, September 27, 2022](#), p. 8.

⁸ [350 Sac. Fact Sheet 3, Sacramento County CAP Allows More Sprawl and GHG Pollution. March 2022.](#)

likely to result in GHG emissions and other environmental impacts not previously subjected to CEQA analysis in the 2011 FEIR. The County has yet to respond to our concerns. The SEIR should consider the potential effects of such excess entitlements; alternatively, the SEIR should discuss this issue as a known controversy, pursuant to §15123(b)(2).

F. THE COUNTY'S SPRAWL MITIGATION APPEARS UNSUPPORTED

We have previously asserted that the County's proposed mitigation for project-specific expansion of the County's UPA. Land Use Policies LU-119 and LU-120, allowing project-specific expansion of the UPA growth boundary, were not subject to environmental review in the GPU's 2011 FEIR,⁹ and we here elaborate.

1. **The GPU FEIR's Analysis.** The FEIR found that project-specific UPA expansion:

- a) Conflicts with smart growth. *"The Jackson Highway Corridor¹⁰ conflicts with smart growth principles significantly..."* (GP FEIR p. 3-75).
- b) Confounds Infrastructure Planning. *"If this boundary is expanded more frequently than necessary or includes too much land, it makes the logical planning and prioritization of growth and infrastructure difficult to achieve. This policy conflicts with smart growth..."* (GP FEIR p.3-39).
- c) Undermines County goals, policies, and principles re infill, contiguous urban development, and the "Smart Growth" principles which the GPU claims to embody.¹¹
"Locating...growth...within an area dominated by open space and agriculture conflicts with smart growth. ...this superabundance of greenfield growth area is likely to draw development away from the more challenging infill and redevelopment projects... [which also] conflicts with smart growth..." (FEIR, pp. 3-31 - 3-32).
- d) Creates "Leapfrog Pressure" and planning complications.
"The larger the area designated for growth... the greater the potential [for] developments...disconnected...from each other and...existing urbanized area. This...scattered, or leapfrog, development makes it difficult to provide...walkable neighborhoods ... [and] causes difficulties with master planning transportation, drainage, and other infrastructure..." (FEIR, pp. 3-31 - 3-32).
- e) Would cause significant impacts.

⁹ [350 Sac, October 8, 2021. Comment letter](#), pp. 11-12.

¹⁰ In 2011, only three candidates for GPA project-specific UPA expansion were proposed, and discussed in the FEIR, all on the Jackson corridor: New Bridge, Jackson Township, and Jackson West (two of which are now approved). Subsequently, two more very large GPA projects in North Natomas were approved for planning and are in process. The FEIR's analysis would apply to all.

¹¹ Such policies include: EN-10G, LU-1, LU-3, LU-4, LU-5, LU-6, LU-7, LU-8, LU-11, LU-23, LU-26, LU-60, LU-81, LU-33, LU-34, LU-90, LU-57, LU-68, LU-74, LU-82, LU-108B.

The...policy conflicts with smart growth principles...are of great import, because the policies deal with expansion of the Urban Policy Area... The physical effects...are significant”, (FEIR, p. 3-40).

- f) Is not needed. The FEIR identified three environmentally preferable ways to meet housing needs: development of the Easton growth area; the West of Watt new growth area; and redevelopment of Commercial Corridors adjacent the City of Sacramento.¹²

“Among their advantages are adjacency to existing urban development, smart growth design, and access to transportation corridors and/or transit...consistent with the smart growth principles, impacts are less than significant” (FEIR, p. 3-34 - 3-35)”.

- g) Could be mitigated in only one way.

“[Project specific UPA expansion] conflicts with smart growth principles significantly, but the introduction of a policy requiring logical phasing of development in the area would reduce the impact to less-than-significant levels.” (GP FEIR p. 3-75).

2. **The County Response.** Supervisors did not adopt the FEIR’s proposed mitigation. Instead, they took three actions, none supported by the FEIR’s analyses:

- a) rejected policies to increase densities,
b) reduced the amount of growth assumed within the approved UPA,
c) approved two new land use policies permitting project-specific expansion of the UPA: ¹³

- i. New Policy LU-119 permits project-specific expansion, requires that such expansions be contiguous to the existing UPA boundary, and asserts that this assures urban continuity. However, because the UPA boundary is meant to delineate the furthest possible extent of development during the GPU’s planning period, it will rarely be built-out. As a result, the UPA boundary, originally established to demarcate the area within which growth would be accommodated, has become the malleable line from which further greenfield encroachment can progressively expand, project-by-project, in “leap-frog” fashion.
- ii. New Policy LU-120, directs the onsite form, but not the location, of such development. Onsite mitigation was not considered as a mitigation measure in the FEIR and does not address the location-based problems identified in the FEIR as being inherent to “leapfrog” development.

In summary, the mitigation identified in the FEIR was not adopted, and the adopted mitigation was not identified in the FEIR.

¹² Franklin Boulevard, Stockton Boulevard South and Central, Florin Road Area, Folsom Boulevard, Fair Oaks Boulevard West, Auburn Boulevard South, and Watt Avenue Central.

¹³ Sacramento County General Plan Update – Findings of Fact and Statement of Overriding Considerations (pp. 1-2). November 9, 2011.

3. The County's CEQA Findings.

- a) The County's Rationale. The County explains, "...accurately predicting future demand is difficult... Given turbulent market conditions that exist today, it is nearly impossible to accurately anticipate future housing demand".¹⁴ "... in 2011, the General Plan added policies...to allow applicants to request an expansion of the UPA anywhere within the USB¹⁵ regardless of demand or existing capacity. The County's intent was to let the market determine the need and location for new growth...".¹⁶
- b) The Effect of the County's Action. In effect, in 2011 the County abandoned its responsibility to plan efficient land use, and used its planning authority to invite inefficient "leapfrog" development outside the adopted County growth boundary, based on an unsupported contention that uncertainties in future growth made rational planning impossible. The observable result today is the multiple sprawl developments adopted and being planned along the Jackson highway and in North Natomas.
- c) The County's Legal Justification. Deviation from the FEIR's conclusion was reflected in the County's Findings, supported by an apparently inapposite legal precedent, *Laguna Beach*,¹⁷ which the Findings describe and quote as, "It is not unreasonable to conclude that an alternative not discussed in an EIR could be intelligently considered by studying the adequate descriptions of the plans that are discussed",

We question whether adoption of measures not at all considered in the FEIR's analysis; the efficacy of which cannot be deduced from the FEIR's findings; and which conflict with the FEIR's conclusions, properly falls within the decision-scope of *Laguna Beach*.

- c) The GPU's Unfaithful Transcription of GHG Mitigation. FEIR GHG mitigation measure CC-2 includes a proviso that its measures would be adopted into the GPU as policy statements. The County's Findings accurately quotes the FEIR's GHG mitigation measure CC-2, followed by a heading statement, "Actual text in the draft Land Use Element that complies with CC - 2:". However, the succeeding recitation of CC-2 differs from and is substantially weaker than that in the FEIR. The Findings do not acknowledge the difference, or explain in what sense the weaker version "complies" with the original language. ATTACHMENT 4 contrasts the two versions.
4. **Consideration in the SEIR.** CEQA Guidelines §21094(e)(4) requires that cumulative impacts not adequately analyzed in a prior EIR must be considered in a subsequent tiered environmental document. If Policies LU-119 and LU-120 were not adequately substantiated in the GPU FEIR, the SEIR should provide an analysis of those policies' potential effectiveness and impacts. Alternatively, the SEIR should discuss this issue as a known controversy, pursuant to §15123(b)(2).

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15 The Urban Policy Area (UPA) nominally establishes the area available for development during the current planning period. The Urban Services Boundary (USB) is the ultimate growth boundary established in the General Plan to demarcate the area beyond which urban growth is never expected to occur or associated County services provided. Several GPA projects now in planning lie outside both the UPA and USB.

16 Sacramento County. 2030 General Plan 2020 Annual Report. March 24, 2021

17 Village Laguna of Laguna Beach, Inc. v. Orange County Board of Supervisors (1982) 134 Cal.App.3d 1022, 1028-1029 (Laguna Beach)

G. IMPLEMENTATION MONITORING AND REPORTING

Timely program reporting is fundamental for accountability and to ensure prompt adjustments to the program when needed to accomplish its purpose. The NOP is silent on program reporting, but the Consultant Scope (Task 6.1.5) indicates the final SEIR will include a Mitigation Monitoring and Reporting Plan for all mitigation measures. We appreciate the intention to ensure that, “*the language used to identify the County’s CAP monitoring, evaluation, and reporting commitments is clear, specific, and enforceable*”. We have previously asserted that the prior drafts’ reporting scheme was not credible,¹⁸ and suggest:

1. **Annual Reporting.** There should be a minimum of annual public reporting to Supervisors, detailed enough to provide a complete and accurate assessment of program status relative to the implementation schedule.
2. **Formal CAP Updates** should be scheduled at five-year intervals, at dates certain, to ensure the program is evolving appropriately in response to emerging challenges and opportunities.
3. **Interim Reporting.** We strongly endorse the suggestion (Consultant Scope, Task 7) for, “*public information campaigns to share this data [ongoing monitoring and evaluation of the CAP’s progress], with the public and decision-makers (e.g., online dashboard)*”.

H. REQUEST FOR INTERIM TECHNICAL REPORTS

To enhance public participation in the revised CAP/EIR’s development, we request copies of the following final interim products:

1. Task 3 Technical Memorandum – Emissions Forecasts and Reduction Targets.
2. Task 4 Technical Memorandum – Revised GHG Reduction Measures.

III. COUNTY-IDENTIFIED ALTERNATIVES

Pursuant to §15126.6, the SEIR should describe a range of reasonable alternatives and evaluate their comparative merits. According to the Consultant Scope (p. 10), the County anticipates the draft SEIR “*will include an evaluation of three project alternatives*”:

- (1) No Action Alternative, “*...retention of the current CAP;*”
- (2) “[A]lternatives considered but rejected that may be based on previous concepts for the Revised CAP”
- (3) Project Alternative, the revised draft CAP.

Identifying the number and content of alternatives prior to CEQA scoping appears premature, and we are gratified the County is now requesting input regarding this key CEQA element.

Our comments on this section are organized as follows:

- A. NO ACTION ALTERNATIVE
- B. [ALTERNATIVES CONSIDERED BUT REJECTED](#)

¹⁸ 350 Sac, September 27, 2022, pp. 11-12.

A. NO ACTION ALTERNATIVE

1. The No Action alternative represents conditions that would prevail if the project were not adopted; and assumes that the August 2022 final draft, presented to supervisors but not adopted on September 27, 2022, would be adopted instead. Because a qualified CAP obviates further GHG CEQA review, that CAP's legally insufficient measures if unchallenged would result in cumulatively considerable secondary GHG impacts. Hence the necessity of the 2024 revised draft CAP, which as mentioned above promises to correct eight important deficiencies of that prior version. Any CAP, including the 2024 revision, if not adequately substantiated as feasible, effective, and enforceable would result in such adverse impacts.

B. ALTERNATIVES CONSIDERED BUT REJECTED”

The second alternative would involve, “*alternatives considered but rejected*” by County staff, who relegated them in the prior draft CAP to, “*Appendix F: Additional Options Considered for the CAP – Provides a discussion of strategy options and a list of CAP measures that were considered for inclusion, but excluded*”

We have previously commented, with examples, that Appendix F’s “reasons for dismissal” lack credibility.¹⁹ In any case, there is no problem re-considering previously rejected measures, but limiting options to those previously rejected seems arbitrary, and unlikely to provide the “range of reasonable alternatives” required by 14 CCR § 5126.6(a).

Instead of or in addition to the above we propose a new “smart growth” alternative.

IV. PROPOSED “SMART GROWTH” ALTERNATIVE ²⁰

Given the importance of VMT as a GHG source, Sacramento County’s land use choices will be the major factor in determining the County’s future emissions. The County is well-positioned to consider a “smart growth” alternative, focusing on infill and VMT reduction, because:

- The connection between land use and induced VMT is well-known;^{21 22 23}
- State and regional policy strongly favor infill and VMT reduction;

¹⁹ [350 Sac. October 8, 2021. Comment letter](#), (p. 26).

²⁰ “Smart Growth” is “*compact, efficient, and environmentally sensitive pattern of development that focuses future growth away from rural areas and closer to existing and planned job centers and public facilities, while preserving open space and making more efficient use of existing urban infrastructure*” (Golden Door Properties, LLC v. County of San Diego (2020) 50 Cal.App.5th 467)

²¹ Decker, N. et al. Right Type, Right Place - Assessing the Environmental and Economic Impacts of Infill Residential Development through 2030. Next 10. March 28, 2017. Online: <https://www.next10.org/publications/right-housing>.

²² Popovich, N et al. The Climate Impact of Your Neighborhood, Mapped. NY Times. December 13, 2022. Online: <https://www.nytimes.com/interactive/2022/12/13/climate/climate-footprint-map-neighborhood.html> <https://www.nytimes.com/interactive/2022/12/13/climate/climate-footprint-map-neighborhood.html>

²³ Karlamangla, S. What’s Your Neighborhood’s Climate Impact? NY Times. February. 6, 2023. Online: <https://www.nytimes.com/2023/02/06/us/california-neighborhood-climate-impact.html>

- Infill and VMT reduction are supported by the County’s 2011 GPU and other plans.
- Courts have recognized that in considering VMT reduction, a “smart growth” land use-alternative is appropriate, including in climate action plans.²⁴

Our comments in this section are organized as follows:

- A. INFILL ELEMENT
- B. [VMT-REDUCTION ELEMENT](#)

A. THE INFILL ELEMENT

1. **State Guidance.** The State has long and clearly maintained that, notwithstanding future phase-out of gasoline-fueled vehicles, reducing VMT through changes in local land use is critical to meeting the State’s GHG targets. SB 375 states:

“Section 1.(c). Greenhouse gas emissions from automobiles and light trucks can be substantially reduced by new vehicle technology and by the increased use of low carbon fuel. However, even taking these measures into account, it will be necessary to achieve significant additional greenhouse gas reductions from changed land use patterns and improved transportation. Without improved land use and transportation policy, California will not be able to achieve the goals of AB 32”, (emphasis added).

- a) **CARB Scoping Document.**²⁵ This State guidance states, “...strategies that support more compact development infill areas...have the greatest potential to reduce emissions (p. 5) ... the State has long been clear that urban infill projects, particularly in high-resource and low-VMT areas, would be generally supportive of the State’s climate and regional air quality goals” (p. 20). CARB’s “Priority GHG Reduction Strategies”,²⁶ include, “... enable mixed-use, walkable, transit-oriented, and compact infill development”, and, “Preserve natural and working lands ... guide development toward infill areas and do not convert “greenfield” land to urban uses (p.12).
- b) **CARB SCS Guidance.** SB 375 requires the Sacramento Council of Governments (SACOG) to adopt a regional Sustainable Community Strategies (SCS) to reduce VMT through coordinated transportation, housing, and land use planning. CARB sets VMT-reduction targets for SACOG and evaluates compliance. Developments consistent with the SCS are relieved of certain CEQA requirements.²⁷

“Many local agencies have not successfully advanced infill and climate-friendly

²⁴ Cleveland National Forest Foundation v. San Diego Association of Governments (2017) 17 Cal.App 5th 413 (“Cleveland III”). Golden Door Properties, LLC v. County of San Diego, 50 Cal. App. 5th 467 (2020)

²⁵ California Air Resources Board. 2022 Scoping Plan, appendix D, Local Actions. November 2022. Online: https://ww2.arb.ca.gov/sites/default/files/2022-05/2022-draft-sp-appendix-d-local-actions_0.pdf

²⁶ “...designated as ‘priority’ because they are the GHG reduction opportunities over which local governments have the most authority and that have the highest GHG reduction potential” (CARB, Scoping Plan, 2022, Table 1).

²⁷ CARB. Sustainable Communities & Climate Protection Program. Online: <https://ww2.arb.ca.gov/our-work/programs/sustainable-communities-climate-protection-program>

*development as needed, even with many regions identifying priority areas in the SCSs to do that. Too often growth is still being planned for land outside existing communities or built there first”.*²⁸

- c) CARB Mitigation Recommendations. In the context of SCS consistency, CARB has identified mitigation criteria focused on Sacramento County.²⁹
- d) Office of Planning and Research. *“Infill development is critical to accommodating growth and redesigning our cities to be environmentally- and socially-sustainable. OPR is committed to promoting compact development in order to: Reduce greenhouse gas emissions and improve regional air quality by reducing the distance people need to travel; reduce conversion of agricultural land, sensitive habitat, and open space for new development; reduce costs to build and maintain expensive infrastructure; facilitate healthy and environmentally-friendly active transportation; reduce storm-water runoff resulting in flooding and pollution of waterways; bring vibrancy, community and social connection to neighborhoods”.*³⁰

2 Regional Guidance

- a) SACOG’s regional SCS/Blueprint is mandated by SB 375 and focuses on infill, compact development, and related transportation strategies to reduce GHG emissions. *“Prioritizing and incentivizing infill development is one of the most important actions government agencies can take to reduce the amount and distance that people need to drive, manage congestion, foster economic development, and reduce tailpipe emissions that affect air quality and greenhouse gas emissions”.*³¹
- b) SMAQMD. The Sacramento Metropolitan AQMD publishes GHG thresholds and VMT-reduction guidance.³²
- c) Sacramento Regional Transit District (SacRT) provides bus, light rail, paratransit, and other transit services to Sacramento and nearby Counties. SacRT advocates for land use compatible with efficient transit service,

3. The County’s Plans

- a) The County General Plan (GP)

Infill is a stated priority in the goals, policies, and implementation measures of multiple GP elements including the Land Use, Housing, Economic Development, and

²⁸ California Air Resources Board. 2022 Progress Report, California’s Sustainable Communities and Climate Protection Act (SB 375), p. 36. 2022.

²⁹ CARB. Comments on the Sacramento County Transportation Maintenance, Safety, and Congestion Relief Act of 2022—Retail Transactions and Use Tax (Measure A). October 10, 2022. Online: https://drive.google.com/file/d/1-vFaHEOCBJDzs26rNj_3Po9Fk3evyi17/view?usp=sharing.

³⁰ Office of Planning and Research. Infill Development. Online: <https://opr.ca.gov/planning/land-use/infill-development>.

³¹ SACOG. Establishing Green Zones. Online: <https://www.sacog.org/funding/regional-funding-programs/green-means-go/establishing-green-zones>

³² SMAQMD. Greenhouse Gas Thresholds for Sacramento County. June 2, 2020. Online: <https://www.airquality.org/LandUseTransportation/Documents/SMAQMDGHGThresholds2020-03-04v2.pdf>

Circulation elements, and the GP's "Land Use Strategies and Policies" statement.³³ GP policies focusing on infill include LU-3, LU-4, LU-6, LU-7, and LU-8, among others.

GP Policy LU-3 states,

"It is the intent of the County to focus investment of public resources on revitalization efforts within existing communities, especially within commercial corridors, while also allowing planning and development to occur within strategic new growth areas".

Unfortunately, the GP does not define "strategic", so the practical application of policy LU-3 is subject to wide interpretation. However, LU-3 directs that,

"... the County must ensure that resources are not prematurely shifted away from corridor revitalization efforts and buildout of planned communities to plan for development in the new growth areas" (LU Element, p. 25).

The GP thus recognizes the practical tension between revitalizing existing communities and developing new areas, and cautions that revitalizing existing communities and buildout of already planned and approved communities near the urban core, waiting build-out, should precede before "shifting" resource to outlying greenfield areas.

The "streamlining" function of the CAP will support development of the GPA projects, drawing staff resources away from infill and buildout of already entitled projects. The SEIR should consider the environmental impacts of such diversion of staff resources to GPA greenfield development.

- b) The County's Phase 1 CAP.³⁴ The Phase 1 CAP was prepared to "adopt overall strategies and goals", and be "the foundation for the CAP components which follow, and to "augment and inform the Goals, Objectives, Policies and Implementation Measures of the 2030 General Plan"³⁵. The Phase 1 CAP discusses infill and VMT reduction at some length, e.g., "Sacramento County determines land use patterns, which in turn affect ... GHG emissions.... As VMT is directly tied to how communities are planned and developed, reducing VMT will require changes to ... land use ... practice (p. 33).
- c) The County Infill Development Program.³⁶ The County adopted an infill Program in 2008` seeking among other co-benefits to, "improve regional air quality by reducing greenhouse gas emissions (GHGs) and vehicles miles traveled)". Work lagged, but

³³ Sacramento County. 2030 General Plan 2022 Annual Report, Attachment 1. March 28, 2023.

³⁴ Sacramento County. Phase1 Climate Action Plan Framework and Policy Document. October 2011. Online: <https://planning.saccounty.gov/PlansandProjectsIn-Progress/Documents/Climate%20Action%20Plan/CAP%20Strategy%20and%20Framework%20Document.PDF>

³⁵ Sacramento County. "Resolution of the Board of Supervisors of the County of Sacramento, State of California Adopting a Strategy and Framework Document". November 9, 2011

³⁶ Sacramento County Infill Development Program. Online: <https://planning.saccounty.gov/Programs/Pages/InfillDevelopmentProgram.aspx>

in 2020 the County received LEAP funding to update the Program by:³⁷

- Assessing and developing a comprehensive inventory of infill sites.
- Analyzing existing regulations and codes to assess the impediments to development.
- Developing a comprehensive amendment package with a focus on reducing impediments for appropriate projects.
- Developing incentives/strategies to maximize infill opportunities.

Project completion was scheduled for September, 2023.

- d) The County's Green Means Go Zones. In partnership with SACOG, Sacramento County has identified and nominated five priority infill "Green Zones",³⁸ for funding through state Regional Early Action Program grants. Green Zones must be within infill areas defined by SACOG's 2020 MTP/SCS, planned for growth, and supported by local policies. They are, South Sacramento-Stockton Boulevard-14th Avenue to Mack Rd; Fair Oaks Blvd Corridor; Arden Way Corridor; Butterfield RT Station; and North Watt Corridor
- e) The 2022 Urban Land Institute Advisory Services Panel.³⁹ In November 2022, Sacramento County partnered with SACOG and the City of Folsom in a weeklong Panel centered on accelerating housing along suburban commercial corridors. The panel developed recommendations to facilitate infill residential development on North Watt Avenue in Sacramento County.
- f) The Re-Envision West Arcade Plan. In 2022 the County completed a two-year planning project to create safer and more appealing walking, rolling, bicycling, and driving conditions in the West Arcade community
- g) Other Related Activities⁴⁰
- (1) Completion of Active Transportation Plan.
 - (2) Amendments to facilitate Vineyard projects buildout.
 - (3) Update Stockton Boulevard SPA.
 - (4) Completion of ADU construction plans.
 - (5) In addition, the County has listed some 14 other plans and projects which it considers support infill.⁴¹

³⁷ Sacramento County. Board Agenda Item 10, Adopt Resolution Authorizing the Planning Director To Execute A Contract For Preparation Of The Infill Program Update With PlaceWorks Funded By A Local Early Action Planning Grant In The Amount Of \$249,978 With A Contingency Amount of \$25,000. August 23, 2022 .

³⁸ The County's five "Green Zones" are South Sacramento-Stockton Boulevard-14th Avenue to Mack Rd; Fair Oaks Blvd Corridor; Arden Way Corridor; Butterfield RT Station; and North Watt Corridor.

³⁹ Urban Land Institute (ULI) Advisory Services Panel. Online: <https://sacramento.uli.org/about/advisory-services/2022-uli-advisory-services-panel-with-sacog/>

⁴⁰ Sacramento County. 2030 General Plan 2022 Annual Report, Attachment 1. March 28, 2023.

⁴¹ Sacramento County. Board of Supervisor's Meeting, Adoption Of The Communitywide Climate Action Plan, Attachment 3, Response to Comments (pp. 13-14). September 27, 2022.

4. The County's Sprawl Bias

Notwithstanding the above policies and plans, in practice Sacramento County has favored sprawl as its primary growth-accommodation strategy. The County has entitled a large number of dwelling units in areas disjunct from existing urbanization, and plans to entitle many more.

- a) GPU Policy LU 119. As the County explains, “...in 2011, the General Plan added policies ... to allow applicants to request an expansion of the UPA anywhere within the USB⁴² regardless of demand or existing capacity. The County's intent was to let the market determine the need and location for new growth...”.⁴³ As discussed above in comment II.F, the County's invitation to sprawl development far from existing urbanization and rejection of densification policies, has shifted public and private resources from infill to sprawl.
- b) GPA Projects. Since 2011, the County has approved planning for six large GPA projects outside the adopted UPA growth boundary, so far approving two. To our knowledge, the County has never rejected a GPA application, either for planning or final approval.⁴⁴
- c) Excess Entitlements. As detailed in previous comments,⁴⁵ the County has entitled far more sprawl DU's than needed to accommodate expected growth, and plans to approve more. Excess entitlements far exceeding market demand will result in partially built-out tracts, with foreseeable GHG and other environmental impacts not subjected to prior CEQA analysis. The County has yet to respond to our remarks.
- d) County's Solution to Sprawl. The County has asserted that VMT induced by disjunct development will be reduced as further nearby greenfield projects are developed, creating urban mass – i.e., the solution to sprawl is more sprawl.⁴⁶
- e) County's Objection to SACOG SCS Draft Projections. Per comment II.C above, the County proposes to “augment” SACOG's draft SCS 2025 projections to reflect more County sprawl. The County has reportedly asked SACOG to modify the projections to show 333 percent more County sprawl and 50 percent less infill than SACOG's

⁴² The Urban Policy Area (UPA) nominally establishes the area available for development during the current planning period. The Urban Services Boundary (USB) is the ultimate growth boundary established in the General Plan to demarcate the area beyond which urban growth is never expected to occur or associated County services provided. Several GPA projects now in planning lie outside both the UPA and USB.

⁴³ Sacramento County. 2030 General Plan 2020 Annual Report. March 24, 2021

⁴⁴ 350 Sac. [Fact Sheet 3, Sacramento County CAP Allows More Sprawl and GHG Pollution. March 2022.](#)

⁴⁵ [350 Sac. Comment letter, April 9, 2021., pp. 2](#)
[350 Sac. Comment Letter, October 8, 2021., p. 11](#)
[350 Sac, Comment Letter, September 27, 2022, p. 8](#)

⁴⁶ Sacramento County. Jackson Township Draft Environmental Impact Report (Recirculated), pp. 20-41, Table SI-2. May 2021.

plan, which would undermine the SCS's ability to achieve its VMT-reduction goal.⁴⁷

B. VMT-REDUCTION ELEMENT

State, regional, and county support for VMT reduction measures is similar to that identified above for Infill. We recognize that the prior draft CAP includes several VMT reduction measures. Potential measures include, but are not limited to: T

- Transit-oriented development
- EV/ZEV support
- Transit and micro-transit
- Active transportation
- Shared mobility
- Travel demand management
- Complete streets
- Incentives
- Pricing disincentives.

V. APPLICATION OF CAP TO GENERAL PLAN AND UPDATE

The 2011 GPU's planning horizon is 2030, and updating will be a multi-year process. Supervisors budgeted \$250,000 for FY 2022-23 to initiate scoping and coordination work. The SEIR should indicate how the CAP will integrate with the current GP 2030, and into the future GP update process.

As always, our aim to support the County's adoption of an effective, CEQA-compliant CAP. Thank you for considering our comments.

Sincerely,



Oscar Balaguer, Chair
350 Sacramento CAP Team

Cc: Liaisons, CCL, ECOS, SCC, Sierra Club,

⁴⁷ Philp, Tom. Sacramento Bee, Sacramento supervisors are addicted to sprawl. It could cost our region dearly. December 7, 2023. Online:
<https://www.sacbee.com/opinion/article281716338.html#storylink=cpy>

**SACRAMENTO COUNTY CLIMATE MITIGATION
- DEFERRED AND DISREGARDED PROMISES -**

October 2011 – CAP Strategy and Framework Document³

The *Strategy Document* is meant to, “...adopt overall strategies and goals” which the community-wide CAP would “flesh out”. It states that, “reducing transportation-related ... emissions is critical... [and] requires a shift in long-standing ... thinking related to development ... [s]hifting development patterns to ... compact development”.

NOT DONE. The current draft CAP does not discuss shifting from continued sprawl.

November 2011 – General Plan Update & Environmental Impact Report¹

CEQA required the County to mitigate the GHG impacts of its 2011 General Plan update². The County deferred to promised future actions, including:

- Adopt a “detailed” Climate Action Plan “within one year”.
- Complete a GHG emissions inventory every three years.
- Adopt a Green Building Program by 2012, and update at minimum every five years.
- Adopt a development fee to fund the CAP.
- Adopt the promised mitigation into the General Plan

NOT DONE. No CAP adopted. Two Inventories completed out of five. No Green Building program established, or development fee adopted. Mitigation as adopted into the General Plan was substantially weakened.

June 2012 – Government Operations CAP⁴

The *Gov Ops CAP* described County operation emission-reductions:

- Implement 25 specified measures to reduce GHG emissions by 6,363 MTCO₂e/yr by 2020.
- Develop metrics to assess effectiveness of the Plan
- Report progress to elected officials and public, and update CAP as needed.

NOT DONE. No metrics, reports, or updates have been presented. The last draft CAP presents a Gov Ops plan with no evident correlation to or mention of the 2012 plan.

December 2020 – Climate Emergency Declaration⁵

The County’s CED directs that the CAP, “... shall explain the County’s approach to ... achieve carbon neutrality by 2030, and ... Countystaff shall evaluate the resources necessary ... and ... emergency action required ... [and] shall identify [funding] gaps and... recommendations”.

NOT DONE. The current draft CAP does not substantively explain how the County can achieve the CED’s goal; evaluate needed resources; or identify emergency actions or recommendations. The CAP delegates this work to a future proposal to be developed by a volunteer Task Force

¹ Sacramento County, General Plan 2030 FEIR, Vol II, “Mitigation Measures”, 2011 Page 12-39.

² Pursuant to the California Environmental Quality Act.

³ Sacramento County, Phase 1 CAP, Strategy and Framework Document, November 9, 2011.

⁴ Sacramento County, Climate Action Plan for Government Operations, June 2012.

⁵ Sacramento County, *Resolution Declaring A Climate Emergency*, December 2020, 3rd and 4th Resolves

SACRAMENTO COUNTY CLIMATE ACTION PLAN – HISTORY –

To a scientific certainty, unless global governments at every level rapidly transition from fossil fuels, their citizens will face progressively severe weather catastrophes. It is also widely recognized that this difficult transition is not happening fast enough.

Sacramento County began planning a climate action plan (CAP) in 2008. More than 15 years later, the County has not yet adopted a CAP. A review of the County's efforts may offer an instructive case study on how institutional inertia can stymie staff and public efforts to effectively complete what is arguably the most consequential planning effort the County will ever undertake. Key milestones in the County's process are listed below.

2007. SB 97 amends the California Environmental Protection Act (CEQA) to require analysis and mitigation of greenhouse gases (GHG) during CEQA process, effective March 18, 2010.

April 29, 2008. Sacramento County staff presents to the Board of Supervisors background information on climate change, State regulations, and associated opportunities and challenges.

May 27, 2008. Supervisors direct staff to return to the Board as needed with updates and work products requiring review and action.

May 12, 2009: Staff presents the draft Phase 1 CAP, the first of various work products prepared to address "regulatory drivers and local priorities". The draft includes a GHG emissions inventory, and describes how the County can integrate climate protection into planning and resource management, adopt green building practices, promote healthy, pedestrian-friendly communities, and curb vehicle emissions.

June 2, 2009: Supervisors allocate a portion of the County's federal Energy Efficiency Conservation Block Grant Program (EECBGP) grant to fund the Phase 2 CAP (a prime purpose of the EECBGP is to "reduce fossil fuel emissions").

August 25, 2010. At a Supervisor workshop, staff introduces the Phase 2 Implementation Plan which will include two phases: a 2A County government operations CAP, and a 2B communitywide CAP. Staff presents a timeline to provide, "adoption of a Phase 2 CAP within one year of the updated General Plan's adoption".

November 9, 2011. Supervisors adopt/certify a General Plan Update/Final Environmental Impact Report (FEIR), promising the County will:

- Adopt a Phase 1 CAP, "Framework and Policy Document",¹ which presents "overall strategies and goals"; and is meant to "augment and inform the Goals, Objectives, Policies and Implementation Measures of the 2030 General Plan"; and to be, "the foundation for the CAP components which follow".
 - Adopt a Phase 2B Communitywide CAP, "within one year... that includes economic analysis and detailed programs and performance measures, including timelines".
-

-
- Complete other specified GHG-reduction measures.

The General Plan update includes many policies supporting compact, climate-friendly growth; but it also for the first time creates a pathway for urban development outside the County's adopted urban growth boundaries. The Phase 1 CAP is adopted concurrently with the General Plan. The County subsequently fails almost all its GHG commitments. The Phase 1 Plan and General Plan each fail to contain or substantially weaken a number of measures which the FEIR specified were to be included. The County did not, as it promised, adopt the Phase 2B Communitywide CAP within one year (it is still outstanding); adopt a Green Building Program by 2012 and update every five years; provide triennial GHG inventories;² timely adopt GHG thresholds of significance;³ or enact a fee on new development to fund the CAP.

September 11, 2012. Using EECBGP funds, the County adopts a Phase 2A Government Operations CAP, specifying products and reports to be delivered. There is no evidence that these were ever produced. The County's recent drafts of a County Operations CAP do not mention the 2012 CAP or any accomplishments.

2016. County staff conducts targeted public outreach regarding the Phase 2B Communitywide CAP.

May 24, 2017. With the Communitywide CAP five years overdue, the County schedules a Board hearing to consider. Staff presents a base-year 2015 GHG Inventory; Vulnerability Assessment; and four potential GHG-reduction measures. Some Supervisors balk at the measures. Supervisors and staff state that staff will return with more detailed proposals in late 2017; however, they do not. Subsequently the County claims that the CAP is delayed pending the outcome of litigation in another jurisdiction (*Sierra Club/Golden Door v. County of San Diego*).

June 11, 2019. 350 and allies request CAP funding be provided in the County FY 2019-2020 Budget. There is no response.

January 27, 2020. 350 Sac and allies advise County in formal comments that since the 2011 commitment to adopt a CAP, four other jurisdictions in the SACOG region have adopted one, and three more are currently in active draft, notwithstanding pending litigation.

January 28, 2020. 350 Sac comments at the final adoption hearing for Mather South Specific Plan that approval would be inconsistent with the County's promise to address GHG emissions via a CAP, and therefore inconsistent with CEQA. Three Board members support CAP initiation. In February, 350 Sac and allies meet with the three Supervisors and with County staff, and request that the Board formally consider the CAP at an upcoming Annual General Plan Report hearing.

February 18, 2020. 350 Sac and allies write County staff, requesting that the 2019 Annual General Plan Report include a discussion of CAP status.

April 6, 2020. 350 and allies write Supervisors, thank for agreeing to discuss the CAP at an April 7, 2020 hearing on the County's annual general plan report; note that the report states

CAP work won't begin until “a path forward is made clear”; and asks the Board to direct staff to begin work.

April 7, 2020. Supervisors direct staff to initiate CAP work.

August 12, 2020. County initiates a “Focused Stakeholder Group” including environmental, equity, and building industry representatives. The Group meets five times. Absent professional facilitation; a discussion of possible shared goals; and a focus on participant interaction, a collaborative dynamic is not achieved. Meeting frequency decreases.

May 11 2021. At the fifth meeting of the Stakeholders Group, staff advises intent to use an Addendum to the 2011 General Plan FEIR for CEQA compliance. 350 Sac demurs at meeting and subsequently in writing. Staff does not schedule further meetings.

January 2021. County issues Administrative Draft CAP. 350 Sac and others comment to the effect that its measures are not substantiated as feasible, effective, and enforceable .

March 2021. County issues Public Draft CAP . 350 Sac and others comment to the effect that its measures are not substantiated as feasible, effective, and enforceable.

September 2021. County issues Final Draft CAP and an EIR Addendum to the 2011 County General Plan FEIR. 350 Sac and others comment to the effect that its measures are not substantiated as feasible, effective, and enforceable, and the Addendum is inconsistent with CEQA requirements.

February 2022. County issues Revised Final Draft CAP. 350 Sac and others comment to the effect that its measures are not substantiated as feasible, effective, and enforceable, and the Addendum is inconsistent with CEQA requirements.

August 2022. County issues second Revised Final Draft CAP; and a revised Addendum to the 2011 FEIR . 350 Sac comments to the effect that the CAP measures are not substantiated as feasible, effective, and enforceable, and the Addendum is inconsistent with CEQA requirements.

September 27, 2022. Staff presents the second Revised Final Draft CAP to Supervisors for adoption. 350 and others provide extensive written and oral comment. Supervisors decline to approve the CAP, request revision, and direct staff to bring it back to the Board’s December 6, 2022 meeting. or earlier. The December meeting agenda states in regard to the CAP, “THIS ITEM WILL BE DROPPED”, without further explanation.

October 13, 2023. Responding to multiple requests, staff provides 350 Sac a copy of a June 2023 consultant contract/work statement to revise the CAP and prepare a Supplemental EIR (SEIR). The specified work appears to address a number of the concerns expressed by 350 Sac and others since January 2021. Public review of the revised draft CAP is scheduled for May 2024.

December 14, 2023. County publishes a Notice of Preparation for the SEIR and schedules a January 10, 2024 scoping meeting.

**NATIVE CARBON SEQUESTRATION
IN
SACRAMENTO COUNTY SOIL –
ASSESSMENT, AVOIDANCE, AND MITIGATION**

A. Importance of Maintaining Natural Carbon Sequestration

Permanent loss of carbon sequestration due to construction-related vegetation and soil disturbance from greenfield development is among the reasonably foreseeable secondary impacts of CAP adoption the SEIR should evaluate. The California Resource Agency's Statement of Reasons for adopting CEQA Guidelines §15183.5 notes that, "*All substantial evidence regarding potential impacts of a project must be considered in an IS, even if the particular potential impact is not listed in The Resources the Appendix G checklist. (Protect the Historic Amador Waterways, 16 Cal.App.4th at 1109.)*".¹

The Sacramento Municipal Utility District (SMUD) has determined that natural soils and vegetation in Sacramento County sequester large amounts of carbon which are released with landscape disturbance, and found that such sequestration loss can be modeled and quantified under different development scenarios, allowing identification of mitigation choices.²

The California Air Resources Control Board (CARB) states:

*"Although natural and working lands can remove carbon dioxide from the atmosphere and sequester it in soil and vegetation, disturbances such as severe wildfire, land degradation, and conversion can cause these landscapes to emit more carbon dioxide than they store.... Protect[ng] land from conversion to more intensified uses by increasing conservation opportunities and pursuing local planning processes that avoid greenfield development" [can mitigate this loss].*³

B. Losses of Carbon Caused by Greenfield Development Should be Mitigated

SMUD has quantified the current landscape carbon storage in Sacramento County; forecasted Sacramento County landscape carbon storage under varied land use projections, and developed a method for incorporating carbon as an explicit conservation benefit in land use decision-making. Among the findings are:

- There is relatively little overall difference between the footprints of the business-as-usual and compact new growth scenarios, but the infill scenario retained a higher share of landscape carbon,
- The business-as-usual scenario would result in new emissions of 5.2 million MTCO₂e (via a reduction in the 2014 baseline stored carbon estimate), which exceeds the 2015 emissions of unincorporated Sacramento County.
- This information provides opportunity to leverage land use planning to maintain and expand

¹ Resources Agency, December 2009, p. 75.

² Sacramento Municipal Utility District (SMUD). Sacramento County Landscape Carbon Assessment – Initial Study, pp. 1-2. 2017

³ CARB. Natural and Working Lands Climate Change Implementation Plan - Concept Paper, p. 2. 2018.

landscape carbon stocks in Sacramento County.⁴

C. Tools are Available to Model Both Carbon Loss and Mitigation Options

“Planning for landscape carbon storage can make a meaningful mitigation contribution, and the analytical tools to do so in a spatially-explicit manner exist today for the Sacramento region.”⁵

SMUD has developed a GIS-based model that incorporates best practices and draws land classification data from USGS’s LANDFIRE program, soil carbon densities from the NRCS’s gSSURGO database, and biomass carbon densities from the California Air Resources Board.⁶

CARB’s *California Natural and Working Lands Carbon and Greenhouse Gas Model (CALAND)* is a carbon accounting model that assesses the projected GHG benefits of conservation, restoration, and management activities.⁷

⁴ Sacramento Municipal Utility District. Sacramento County Landscape Carbon Assessment Initial Study. December 2017, pp. 2-4.

⁵ SMUD, 2017, p. 7.

⁶ SMUD, 2017.

⁷ Natural Resources Agency. California Natural and Working Lands Carbon and Greenhouse Gas Model (CALAND). July 2017. Online: https://resources.ca.gov/CNRALegacyFiles/wp-Content/uploads/2017/01/CALAND-Technical-Description_9.22.17.pdf.

**SACRAMENTO COUNTY GHG COMMITMENTS
 FEIR / GPU INCONSISTENCIES**

GHG mitigation as transcribed in the General Plan was substantially weakened.

FEIR GHG mitigation measure CC-2 included a proviso that the measures would be adopted in the GPU as policy statements. The CEQA Findings accurately quote GHG mitigation measure CC-2, followed by the statement, “*Actual text in the draft Land Use Element that complies with CC – 2:*”. However, the succeeding recitation of CC-2 is substantially weaker than that in the FEIR. The Findings do not acknowledge the difference or explain in what sense the weaker version “complies” with the original language.

The following table displays both versions, with underlining to high-light discrepancies. In sum, the general plan version substantially weakens CAP adoption and funding commitments; and removes mitigation relating to green buildings, fees on new development, and targets for new development (targets were eventually adopted after projects were approved by the County over 350’s objections).

SAC CO GHG COMMITMENTS - FEIR / GPU INCONSISTENCIES			
FEIR, VOL II, p. 12-39, “MITIGATION MEASURES”		GPU LU-115, “IMPLEMENTATION MEASURES”	
CC-2	...the following shall be included [in the GPU] as implementation measures...		
CC-2, A.	... County shall adopt a <i>first-phase Climate Action Plan</i> , concurrent with [GPU] update, that contains...: .	F	Adopt ... a first-phase Climate Action Plan, concurrent with ...[GPU] approval
CC-2. A.a.	... County shall complete a GHG... inventory every three years ...	G.	... complete a GHG emissions inventory every three years
CC-2. A.b.	... <u>County shall adopt a green building program by 2012...updated... every 5 years.</u> :		[no mention]
CC-2, A.c.	... <u>County shall enact a Climate Change Program that includes</u> ...		[no mention]
CC-2, A.c.i	... <u>includes a fee</u> ...for all new development ...[to fund CAP]...oversight and maintenance ...	I.	... The County shall develop sustainable funding ... which <u>may include a fee</u> ...[on] development...
CC-2, A.c.ii	... <u>reduction targets that apply to new development</u>		[no mention]



January 31, 2024

Mr. Todd Smith, Director
Sacramento County Planning and Environmental Review
827 7th Street,
Sacramento, CA 95814,

Via Email Only: CEQA@saccounty.gov.

SACRAMENTO COUNTY, DRAFT CAP REVISE: RESPONSE TO NOP (REVISED)

Revision Note: These comments supersede and replace 350 Sacramento's January 9, 2024 similarly-titled letter. The two versions are substantively identical with the following exceptions:

- Section II.E.5, "Conflicts with Existing Plans", subsection a) has been augmented.
- Section II.F, "Sprawl Mitigation is Unsupported", Subsection 4, "Consideration in the SEIR" has been augmented.
- Section IV.A.3.a), "The County General Plan" has been augmented.
- Section IV.B, "VMT Reduction Element" has been augmented.
- A new Attachment 4, "Approved and Pending Major Residential Developments" has been added, referenced from pages 7, 8, and 12.
- Footnotes 10 and 23 have been revised.

Dear Todd,

Bill McKibben famously observed in regard to climate change, "winning slow is losing". 350 Sacramento (350 Sac) appreciates the opportunity to provide scoping suggestions for a revised draft of the County's Climate Action Plan (CAP) and associated Supplemental EIR (SEIR). We are gratified that, based on the consultant's scope of work (Consultant Scope),¹ the County has seen fit to address eight of 350 Sac's long-standing concerns,² including by preparing the SEIR. However, over twelve years have passed since the County obligated itself to adopt a CAP "within a year", and almost four years since supervisors formally initiated the CAP. We hope the NOP and this re-draft will lead to an effective, CEQA-compliant CAP. The timing of the NOP seems irregular,³ and we hope any resulting delay will be minimal.

Our comments are organized as follows (hyperlinks aid navigation)

- I. [Project Background](#)
- II. [Comments on NOP](#)
- III. [County-Identified Alternatives](#)
- IV. [Proposed "Smart Growth" Alternative](#)

¹ Sacramento County. Sacramento County Climate Action Plan - Scope of Work and Schedule for Revisions and Technical Updates - June 2023. June 2023. Online: https://drive.google.com/file/d/1HNx900T6l-H0tMmw_sawB35seYa4SJAa/view?usp=sharing

² 350 Sac. Fact Sheet 7, County Progress In Addressing Draft CAP Deficiencies. November 2023. Online: <https://drive.google.com/file/d/1UdGqJwnSAiaNI28v1S65YN6-Fg-oS7uq/view?usp=sharing>.

³ CEQA Guidelines §15082 requires the NOP "immediately after deciding that an environmental impact report is required"; per the Consultant Scope this was known by June 2023.

V. [Application of CAP to Future Plans](#)

I. PROJECT BACKGROUND

In connection with its 2011 general plan update (GPU), the County committed to implementing a number of greenhouse gas (GHG) mitigation measures, including adopting a CAP “within a year”. Almost none of the measures have been accomplished to date, including CAP adoption. [ATTACHMENT 1](#) reviews the County’s 2011 commitments and their implementation status.

The County formally initiated the CAP in 2020 at the urging of 350 Sac and others. Since then, the County has published five draft CAPs (four public, one administrative and shared with stakeholders). All were critiqued by 350 Sac,⁴ and others as, among other things, lacking measures substantiated as feasible, effective, and enforceable; and using an inappropriate environmental document. Our September 27, 2022 letter collates and updates our comments to that date. We here incorporate all our prior comments by reference.

At a contentious September 27, 2022 hearing, supervisors declined to adopt a proposed final CAP. They directed certain revisions and that the item be returned to a December 6, 2022 Board meeting. It was not, and the current proposed revise continues the previous work. [ATTACHMENT 2](#) provides a timeline of CAP development to date.

II. COMMENTS ON NOP

Our comments in this section are organized as follows:

- | | |
|---|---|
| A. EDITORIAL COMMENTS | E. POTENTIAL ENV EFFECTS |
| B. PROJECT BACKGROUND | F. SPRAWL MITIGATION IS UNSUPPORTED |
| C. REVISE SCS FORCASTS | G. IMPL MONITORING AND REPORTING |
| D. GHG REDUCTION STRATEGY | H. REQUEST TECHNICAL REPORTS |

A. EDITORIAL COMMENTS

1. **Table of Contents.** We’re gratified that the SEIR will include a table of contents (Consultant Scope, p.11), and request that the revised CAP also include a complete table of contents (unlike previous versions). We also suggest that in both documents the listings be hyperlinked to their respective text sections to aid navigation, as is common

⁴ [350 Sacramento \(350 Sac\), ECOS, Sierra Club. July 16, 2020.](#)
[350 Sac, September 25, 2020.](#)
[350 Sac, November 19, 2020.](#)
[350 Sac, January 18, 2021.](#)
[350 Sac, ECOS, March 23, 2021.](#)
[350 Sac, April 9, 2021.](#)
[350 Sac, October 8, 2021.](#)
[350 Sac, March 23, 2022.](#)
[350 Sac, September 27, 2022.](#)
[350 Sac, October 11, 2022.](#)
[350 Sac, August 3, 2023.](#)

nowadays.

2. **CAP Status.** Several references to the current and previous draft CAP could confuse readers as to the CAPs adoption status. , e.g., "...2022 Final CAP" (p. 8); "...update the CAP" (p. 9); "...Revised CAP" (pp.11); "...County's current CAP" (p. 11). These statements might imply that a communitywide CAP has been adopted, which is incorrect. To avoid ambiguity, we suggest future documents consistently add the modifier "draft"; and use the verb "revise" rather than "update".

B. PROJECT BACKGROUND (NOP p. 4 ff)

1. The CAP's History.

"The County implemented MM-CC-2 in several phases... On September 11, 2012, the Board of Supervisors adopted the Climate Action Plan – Government Operations" ... "The County began work on a comprehensive CAP in 2016..." (both, NOP p. 4).

- a) Government Operations. The Government Operations CAP is not an element of mitigation measure MM-CC-2, so it appears incorrect to say it implements that measure.
- b) Work History. The County has not worked on the CAP since 2016 with any continuity, as might be implied. Staff made an abortive attempt to get the CAP off the ground in 2016, reaching out to stakeholders, and presenting supervisors with an updated GHG Inventory and sample mitigation measures at a May 2017 workshop. Supervisors did not direct staff to continue work, and no further work products were issued until after April 7, 2020, when Supervisors directed CAP initiation (see Climate Action Plan History, ATTACHMENT 2).

2. **The Project's Purpose.** Confusion as to project purpose could be problematic because it would influence the selection of alternatives. The NOP variously states:

- *"The CAP is intended to serve as mitigation for climate change impacts of the County's 2030 General Plan, as provided by Mitigation Measure (MM) CC-2 in the 2030 General Plan EIR (SCH # 2007082086)"* (p. 1).
- *"The overall objective of the 2024 CAP is to reduce GHG emissions generated from ... the unincorporated county (community) and ... County facilities ... to meet or exceed GHG reduction goals under State laws"* (p. 4).

Both statements are accurate as far as they go, and we suggest that one be chosen or their key features be combined. A possible formulation is:

The purpose of the CAP is to reduce GHG emissions from the unincorporated county, meeting or exceeding State GHG reduction goals to mitigate climate change impacts of the County's 2030 General Plan, as specified in Mitigation Measure CC-2 in the 2030 General Plan EIR (SCH # 2007082086)"

C. GHG EMISSIONS – REVISE SCS PROJECTIONS (NOP p.4 ff.)

"Growth projections will be based on [SACOG's SCS] ...augmented as necessary to reflect in-process and reasonably foreseeable growth not captured_in the 2020 ...[SCS]" (p. 5).

The rationale for deviating from the 2020 SCS, and any available 2025 draft SCS projections, should be clearly explained. The SEIR should analyze the potential effects of any such deviations on achievement of the SCS's mandated "vehicle miles traveled" (VMT)-reduction goals; and other secondary and cumulative environmental impacts should be identified (see also comment II.E.2 re potential plan conflicts).

D. GREENHOUSE GAS REDUCTION STRATEGY (NOP p.5)

1. **Measure Substantiation.** We appreciate the statements in this section relating to substantiating compliance with CEQA requirements and the County's 2011 CAP commitments.

2. Voluntary Programs

"...voluntary programs can be effective ... and can be monitored for effectiveness and quantified reductions..." (NOP p. 5).

We agree in principle. However, such measures need to be substantiated as effective and practicably enforceable on the County through adoption in the CAP. They will need clear, meaningful, detailed performance criteria and monitoring parameters, documented in a checklist or comparable format, to allow timely tracking and modification if needed.

3. Scheduling

"...each measure will include a clear timeline of implementation.... This may include the year... longer-term measures...will include estimated milestone dates by which...actions...would be completed, particularly when... details cannot be specified prior to...CAP...adoption" (p. 5).

This statement raises uncertainty that scheduling will be detailed enough to substantiate CAP measures. Detailed timelines are critical for successful, timely implantation of complex programs such as the CAP's, with inter-related and chronologically over-lapping tasks. Detailed scheduling, showing discrete, defined tasks, start and end dates, and task relationships allows efficient work sequencing, resource allocation, progress tracking and reporting; and provides management a tool to avoid or address scheduling conflicts and setbacks. Nowadays, project management software makes it easy to create and use timelines. But careful planning is needed to ensure that the implementation scheme is both ambitious and realistic, and to ensure and demonstrate that the agency can feasibly complete the work as scheduled. A single end-point target date for measures is inadequate to inform management decisions and to provide accountability.

- a) Implementing Activities. We are gratified that, *"Ascent recommends assigning one or more implementing actions to each measure to define how ...[it] will be implemented... consistent with any performance standards, timing, and enforcement mechanism defined in Task 4.1"* (Consultant Scope, Task 4.2).
- b) Implementing, *"details [which] cannot be specified prior to...CAP...adoption"* should be avoided. The point of an "Action" plan is to provide decision makers and the public with measures which are actionable, not deferred. If any such detail cannot be avoided, it needs to be clearly justified as such, and the pathway and timeline for resolving such details documented and committed to consistent with Guidelines

- §15126.4(a)(1)(B), as part of the implementation scheme,
- c) To support timely implementation, consistent with MM CC-2's "detailed" provision, each measure should be broken down into logical constituent tasks, with start and completion dates, expected products, and critical path relationships indicated. Consistent with professional-level project-management principles, activities should be of short duration and limited scope, to allow efficient, timely management, tracking, and problem-solving.
 - b) Short-term measures, scheduled for accomplishment within two years; and near-term activities for longer-term measures, should include the year and month in which actions will be initiated and completed.
 - c) Longer term actions should be adequately conceptualized, with needed antecedent and supporting actions documented and realistic timeframes identified.
 - d) Schedules should be formally reviewed for update at least annually, in connection with the reporting schedule, to adjust for early or late task completion; and to further detail longer-term measures as their implementing activities come within the two-year time-frame
4. **Sequestration Targets.** The County's Consultant Scope, Task 3.2. notes that AB 1279 establishes a state 2045 GHG emissions goal of net zero/85% reduction, raising the possibility that up to 15 percent of the CAP's mitigation burden could be met through atmospheric drawdown. The County has strong regulatory authority over land use, and very little over natural and working lands management. We support restoring natural sequestration, but have previously provided,⁵ and here augment,⁶ difficulties in substantiating the effectiveness of a voluntary "carbon farming" program. We therefore encourage the County to focus on measures best aligned with its authorities.

In the context of natural sequestration, the County should use its land use authority to avoid loss of carbon stored on Sacramento County natural grassland and other soils, by maximum avoidance of construction-related disturbance. The more the County reduces emissions clearly within its control, especially by avoidance, the less it need consider unlikely re-capture of carbon released through County-permitted activities. Please see further discussion at ATTACHMENT 3. The GPU did not evaluate soil carbon losses from greenfield development whose GHG emissions would be governed by the CAP, and the SEIR should do so.

E. POTENTIAL ENVIRONMENTAL EFFECTS (NOP p. 6 ff.)

"... the SEIR will focus on whether the CAP would result in any new or substantially more severe significant impacts compared to those identified in the certified 2030 General Plan EIR" (NOP p. 6)

1. **Increased Significance of Impacts.** CAP-related GHG impacts may "be substantially more severe" now than when they were reviewed for the 2011 GPU, because targets under SB 32 and AB 1279 are substantially more stringent than those in effect in 2011

⁵ [350 Sac, October 8, 2021](#) (pp. 23-25).

⁶ Julie Creswell. Companies' Climate Promises Face a Wild Card: Farmers. NY Times, July 9, 2022. Online: <https://www.nytimes.com/2022/07/09/business/farmers-climate-change.html>

under AB 32.

2. **Standard of SEIR Analysis.**

“Consistent with the requirements of ... CEQA Guidelines Section 15168, the analysis will provide a program-level discussion of the impacts of implementation the CAP” (NOP, p. 7).

Guidelines §15168 pertains to projects consistent with a community plan or zoning. Section 15183.5 refers more specifically to programmatic greenhouse gas reduction plans, e.g., CAPs. Reducing GHGs is best addressed at the program level, where fundamental land-use and other policy options not available during project-level review can be considered.

Pursuant to §15183.5(b)(1)(D), CAP measures must also demonstrate they would achieve the CAP’s emission targets if implemented on a *“project-by project basis”*. This project-level specificity is reflected in the NOP’s recognition that, to allow CEQA streamlining under the CAP, *“Each GHG reduction measure will have a performance standard”*, and an associated, *“CAP Consistency Checklist will be required to enforce implementation”* of the project-level performance standard through project-level permitting (both, NOP, p. 5). This requirement for enforceable project-level measures is perhaps unique among CEQA-regulated programmatic plans. To the extent that the CAP’s measures are meant to be relied on for, and will streamline and supplant, subsequent project-level CEQA review, they require project-level environmental analysis.

3. **Air Quality Impacts** (NOP, p. 6). The CAP could facilitate approval of greenfield projects outside the County’s adopted Urban Policy Area (UPA) and Urban Services Boundary (USB), requiring general plan amendments (GPA’s). Such GPA projects include the Upper West Side and Grandpark developments currently in planning. Both projects are remote from existing urbanization, in a land use pattern known to induce on-road automobile traffic. The SEIR should discuss the CAP’s potential secondary impacts to air quality from foreseeable emissions of priority pollutants from induced traffic.
4. **Loss of Sequestered Soil Carbon.** Soil disturbance, including from urban development, results in oxidation and release to the atmosphere of sequestered soil carbon, as discussed in comment II.D.4 above and ATTACHMENT 3. The SEIR should analyze resulting soil carbon emissions.
5. **Conflicts with Existing Plans.** CEQA Guidelines §15125(d) requires that the SEIR discuss any inconsistencies with other plans. Any such inconsistencies are now unknown, but based on past draft CAPs, and information provided in the Consultant Scope and the NOP, the following may be possible:
 - a) Inconsistencies with GPU policies LU-3 and LU-68.
 - b) Inconsistencies with Phase 1 CAP
 - c) Inconsistencies with SACOG’s SCS.

6. **Unexamined Excess Entitlements.** Per our previous comments,⁷ the County has entitled far more DU's than needed to accommodate expected growth, and plans to approve many more as displayed in ATTACHMENT 4. Such excess entitlements, far exceeding market demand, appear likely to result in GHG emissions and other environmental impacts not previously subjected to CEQA analysis in the 2011 FEIR. The County has yet to respond to our concerns. The SEIR should consider the potential effects of such excess entitlements; alternatively, the SEIR should discuss this issue as a known controversy, pursuant to §15123(b)(2).

F. THE COUNTY'S SPRAWL MITIGATION APPEARS UNSUPPORTED

We have previously asserted that the County's proposed mitigation for project-specific expansion of the County's UPA. Land Use Policies LU-119 and LU-120, allowing project-specific expansion of the UPA growth boundary, were not subject to environmental review in the GPU's 2011 FEIR,⁸ and we here elaborate.

1. **The GPU FEIR's Analysis.** The FEIR found that project-specific UPA expansion:
- a) Conflicts with smart growth. *"The Jackson Highway Corridor⁹ conflicts with smart growth principles significantly..."* (GP FEIR p. 3-75).
 - b) Confounds Infrastructure Planning. *"If this boundary is expanded more frequently than necessary or includes too much land, it makes the logical planning and prioritization of growth and infrastructure difficult to achieve. This policy conflicts with smart growth..."* (GP FEIR p.3-39).
 - c) Undermines County goals, policies, and principles re infill, contiguous urban development, and the "Smart Growth" principles which the GPU claims to embody.¹⁰
"Locating...growth...within an area dominated by open space and agriculture conflicts with smart growth. ...this superabundance of greenfield growth area is likely to draw development away from the more challenging infill and redevelopment projects... [which also] conflicts with smart growth..." (FEIR, pp. 3-31 - 3-32).

⁷ [350 Sac, April 9, 2021](#) (p. 2).

[350 Sac, October 8, 2021](#) (p. 11).

[350 Sac, Comment Letter, September 27, 2022](#) (p. 8).

⁸ [350 Sac, October 8, 2021. Comment letter](#) (pp. 11-12).

⁹ In 2011, only three candidates for GPA project-specific UPA expansion were proposed, and discussed in the FEIR, all on the Jackson corridor: New Bridge, Jackson Township, and Jackson West (two of which are now approved). Subsequently, two more very large GPA projects in North Natomas were approved for planning and are in process. The FEIR's analysis would apply to all.

¹⁰ Such policies include: EN-10G, LU-1, LU-3, LU-4, LU-5, LU-6, LU-7, LU -8, LU-11, LU-23, LU-26, LU-60, LU-81, LU-33, LU-34, LU-68, LU-90, LU-57, LU-68, LU-74, LU-82, LU-108B.

d) Creates “Leapfrog Pressure” and planning complications.

“The larger the area designated for growth... the greater the potential [for] developments... disconnected... from each other and... existing urbanized area. This... scattered, or leapfrog, development makes it difficult to provide... walkable neighborhoods ... [and] causes difficulties with master planning transportation, drainage, and other infrastructure....” (FEIR, pp. 3-31 - 3-32).

e) Would cause significant impacts.

The... policy conflicts with smart growth principles... are of great import, because the policies deal with expansion of the Urban Policy Area... The physical effects... are significant”, (FEIR, p. 3-40).

f) Is not needed. The FEIR identified three environmentally preferable ways to meet housing needs: development of the Easton growth area; the West of Watt new growth area; and redevelopment of Commercial Corridors adjacent the City of Sacramento.¹¹

“Among their advantages are adjacency to existing urban development, smart growth design, and access to transportation corridors and/or transit... consistent with the smart growth principles, impacts are less than significant” (FEIR, p. 3-34 - 3-35)”.

g) Could be mitigated in only one way.

“[Project specific UPA expansion] conflicts with smart growth principles significantly, but the introduction of a policy requiring logical phasing of development in the area would reduce the impact to less-than-significant levels.” (GP FEIR p. 3-75).

2. **The County Response.** Supervisors did not adopt the FEIR’s proposed mitigation. Instead, they took three actions, none supported by the FEIR’s analyses:

- a) rejected policies to increase densities,
- b) reduced the amount of growth assumed within the approved UPA,
- c) approved two new land use policies permitting project-specific expansion of the UPA: ¹²
 - i. New Policy LU-119 permits project-specific expansion, requires that such expansions be contiguous to the existing UPA boundary, and asserts that this assures urban continuity. However, because the UPA boundary is meant to delineate the furthest possible extent of development during the GPU’s planning period, it will rarely be built-out. As a result, the UPA boundary, originally established to demarcate the area within which growth would be accommodated, has become the malleable line from which further greenfield encroachment can progressively expand, project-by-project, in “leap-frog” fashion.

¹¹ Franklin Boulevard, Stockton Boulevard South and Central, Florin Road Area, Folsom Boulevard, Fair Oaks Boulevard West, Auburn Boulevard South, and Watt Avenue Central.

¹² Sacramento County. General Plan Update, Findings of Fact and Statement of Overriding Considerations (pp. 1-2). November 9, 2011.

- ii. New Policy LU-120, directs the onsite form, but not the location, of such development. Onsite mitigation was not considered as a mitigation measure in the FEIR and does not address the location-based problems identified in the FEIR as being inherent to “leapfrog” development.

In summary, the mitigation identified in the FEIR was not adopted, and the adopted mitigation was not identified in the FEIR.

3. The County’s CEQA Findings.

- a) The County’s Rationale. The County explains, “...*accurately predicting future demand is difficult... Given turbulent market conditions that exist today, it is nearly impossible to accurately anticipate future housing demand*”.¹³ “[I]n 2011, the General Plan added policies...to allow applicants to request an expansion of the UPA anywhere within the USB¹⁴ regardless of demand or existing capacity. The County’s intent was to let the market determine the need and location for new growth...”.¹⁵
- b) The Effect of the County’s Action. In effect, in 2011 the County abandoned its responsibility to plan efficient land use, and used its planning authority to invite inefficient “leapfrog” development outside the adopted County growth boundary, based on an unsupported contention that uncertainties in future growth made rational planning impossible. The observable result today is the multiple sprawl developments adopted and being planned along the Jackson highway and in North Natomas.
- c) The County’s Legal Justification. Deviation from the FEIR’s conclusion was reflected in the County’s Findings, supported by an apparently inapposite legal precedent, *Laguna Beach*,¹⁶ which the Findings describe, and quote as, “*It is not unreasonable to conclude that an alternative not discussed in an EIR could be intelligently considered by studying the adequate descriptions of the plans that are discussed*”,

However, we question whether adoption of measures not at all considered in the FEIR’s analysis; the efficacy of which cannot be deduced from the FEIR’s findings; and which conflict with the FEIR’s conclusions, properly falls within the decision-scope of *Laguna Beach*.

- c) The GPU’s Unfaithful Transcription of GHG Mitigation. FEIR GHG mitigation measure CC-2 includes a proviso that its measures would be adopted into the GPU as policy statements. The County’s Findings accurately quotes the FEIR’s GHG mitigation measure CC-2, followed by a heading statement, “*Actual text in the draft Land Use Element that complies with CC - 2:*”. However, the succeeding recitation of CC-2 differs from and is substantially weaker than that in the FEIR. The Findings do not

¹³ Sacramento County. General Plan Update, Findings of Fact and Statement of Overriding Considerations (p. 2). November 9, 2011.

¹⁴ The Urban Policy Area (UPA) nominally establishes the area available for development during the current planning period. The Urban Services Boundary (USB) is the ultimate growth boundary established in the General Plan to demarcate the area beyond which urban growth is never expected to occur or associated County services provided. Several GPA projects now in planning lie outside both the UPA and USB.

¹⁵ Sacramento County. 2030 General Plan 2020 Annual Report. March 24, 2021

¹⁶ Village Laguna of Laguna Beach, Inc. v. Orange County Board of Supervisors (1982) 134 Cal.App.3d 1022, 1028-1029 (Laguna Beach)

acknowledge the difference, or explain in what sense the weaker version “complies” with the original language. ATTACHMENT 5 contrasts the two versions.

4. Consideration in the SEIR.

Read together, relevant CEQA Guidelines provisions require that CEQA Findings be supported by substantial evidence, and that potential impacts not adequately analyzed in a prior EIR be fully considered in a subsequent tiered environmental document.¹⁷ The County Board of Supervisors adopted GPU Policies LU-119 and LU-120 when approving the 2011 General Plan update as a means of mitigating “leapfrog” development. The County’s Findings state, “...*the Project includes a new growth management policy...supported by the environmental analysis provided in the FEIR*”, with an inappropriately cite to *Laguna Beach* as discussed above (Section II.F.3.c). However, GPU Policies LU-119 and LU-120 were not in any way considered in the County’s 2011 GPU FEIR, nor could they have been. These measures were developed and adopted after preparation of the FEIR, and the efficacy of their measures is not substantiated either in the FEIR or in the County’s Findings. Consequently, the measures’ effect in mitigating impacts from GPA projects outside the UPA, and their own potentially significant environmental impacts, have not been subject to prior environmental review. The SEIR is therefore required to provide such analysis.

The related issues requiring review in the SEIR include:

- a) LU-120, vision of proximity to future projects. GPU Policy LU-120, PC-1, requires, “...*a vision of how the development will connect to other adjacent existing and potential future development areas within the USB....*” That the County values adjacency to potential future development as highly as to existing urbanization invites the “leapfrog pressure” the FEIR warns against, wherein each GPA project provides a springboard for future projects, encroaching progressively further outward from the adopted UPA boundary into rural, natural, and working lands. It also calls into question what “strategic” consideration the County is pursuing, as cited in GPU Policy LU-3 (see section IV.A.3.a) below). The 2011 FEIR did not consider the efficacy of LU-120’s measures in mitigating the adverse impacts of “leapfrog pressure”.
- b) LU-120 – Alternative 1, CB-4, Transit. In principle, transit service can reduce VMT among a serviced population. Criterion CB-4 requires that at least 65 percent of all residential units be located within ½ mile of existing or planned transit service (for GPA projects there will never be existing service), and headways of at least hourly, half-hourly, or every 15 minutes during peak hours, with credit given for more frequent headways. Pursuant to existing County plans, transit service will be phased in during project buildout, with target headways reached only at full buildout.^{18 19} However, the following issues are not addressed in the 2011 FEIR:

¹⁷ §15091(b); §15064(h)(3), §15130(e), §15183(j).

¹⁸ E.g., Sacramento County. Final Environmental Impact Report, Jackson Township Specific Plan. November 2022.

¹⁹ Sacramento County. Staff Report, Transportation Workshop for the Jackson Corridor Development Projects Transportation Mitigation Strategy. July 23, 2019. Online: <https://agendanet.sacounty.gov/BoardofSupervisors/Documents/ViewDocument/BDL%20Jackson%20Highway%20Master%20Plan%20Workshop.docx.pdf?meetingId=3529&documentType=Agend>

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- i. Potentially ineffective headways. Transit ridership correlates directly with headway frequency. LU-120, Alternative 1 identifies five scoring criteria, each with three levels of performance assigned different point values. Under the County's scoring system, target headways of as much as an hour (and less frequent until full buildout) would be allowed. This is unlikely to substantially reduce VMT.
 - ii. Planned buildout period. Target headways, and maximum VMT reduction will be achieved only at full project buildout. In analyzing impacts, VMT/GHG modelling should document emissions during the planned buildout period, before target headways and ridership rates are achieved.
 - iii. Delayed buildout due to excess entitlements . Per previous 350 Sac comments (cited in Section III.E.6 above), the County's adopted and planned projects will provide a 400 percent excess of residential building entitlements relative to SACOG's projected market demand. This plethora of competing projects pursuing limited market demand will likely result in partial build-out of scattered, competing tracts, and indefinitely delay full planned build-out and achievement of target headways. This scattered and incomplete buildout would also undermine the County's strategy to reduce VMT by approving multiple large projects with enough cumulative urban mass to shorten some vehicle trips.
- c) LU-124 – Fifty-acre mitigation exemption. Per GPU Policy LU-124, "*expansions of the UPA (<50 acres) may be considered independent of the requirements per LU-119 and LU-120*". Although impacts from smaller CPA projects may be less than from the County's very large adopted and planned ones, no evidence is presented in the FEIR that they are less than significant. These smaller GPA projects are exempt from the general mitigation specified for GPA projects; could be located anywhere within the USB; and are of unlimited number, so impacts could be cumulatively considerable. This issue is not addressed in the 2011 FEIR.
- d) The County's Solution to Sprawl. The County has asserted that VMT induced by disjunct development will be reduced as further nearby greenfield projects are developed, creating urban mass,²⁰ i.e., the solution to sprawl is more sprawl. This concept is supported by LU-120's measures PC-1 and CB-2, which respectively invite a vision of how a proposed GPA project outside the UPA will connect to potential future GPA projects, in "leapfrog" fashion; and require that project plans include service areas near residences to provide local urban mass. The result would be, and is, to provide multiple opportunities for residential development at various locations in the unincorporated County, far exceeding SACOG's growth projections for the County, but capable of absorbing a large portion of regional population growth. However, because the number of adopted and planned County-entitled dwelling units far exceeds foreseeable market demand, providing 140 years-worth of growth at current buildout rates,²¹ future development would compete for shares of a limited market. As a result, the entitled projects will likely be too thinly built-out to

a&itemId=241436&publishId=795061&isSection=false.

²⁰ Sacramento County. Final Environmental Impact Report, Jackson Township Specific Plan. November 2022.

²¹ Sacramento County. 2030 General Plan 2020 Annual Report. March 24, 2021.

provide the urban mass or to support the transit service that the County is counting on to mitigate the VMT induced by far-flung greenfield development.

The County's 2011 FEIR clearly states that a growth pattern involving development outside the UPA would cause significant impacts; and high induced VMT/GHGs is certainly among them. The County has to-date entitled or approved for planning five very large GPA developments in the central and northern unincorporated areas (see [ATTACHMENT 4](#)); and a sixth massive project is proposed in the east County, outside both the UPA and Urban Services Boundaries.^{22, 23}

GPU Policies LU-119 and LU-120 authorize, support, and purport to mitigate the environmental impacts of the above-described pattern of widespread greenfield development. However, because the County's 2011 GPU FEIR did not assess the efficacy or growth implications of these policies, decision makers and the public were, and are, improperly deprived of analysis of their mitigation value and environmental impacts. To correct this and satisfy CEQA's informational and substantive mitigation requirements, the SEIR should address the cumulative, indirect, and growth-inducing impacts associated with development patterns facilitated through these GPU Policies.

G. IMPLEMENTATION MONITORING AND REPORTING

Timely program reporting is fundamental for accountability and to ensure prompt adjustments to the program when needed to accomplish its purpose. The NOP is silent on program reporting, but the Consultant Scope (Task 6.1.5) indicates the final SEIR will include a Mitigation Monitoring and Reporting Plan for all mitigation measures. We appreciate the intention to ensure that, "*the language used to identify the County's CAP monitoring, evaluation, and reporting commitments is clear, specific, and enforceable*". We have previously asserted that the prior drafts' reporting scheme was not credible,²⁴ and suggest:

1. **Annual Reporting.** There should be a minimum of annual public reporting to Supervisors, detailed enough to provide a complete and accurate assessment of program status relative to the implementation schedule.
2. **Formal CAP Updates** should be scheduled at five-year intervals, at dates certain, to ensure the program is evolving appropriately in response to emerging challenges and opportunities.
3. **Interim Reporting.** We strongly endorse the suggestion (Consultant Scope, Task 7) for, "*public information campaigns to share this data [ongoing monitoring and evaluation of the CAP's progress], with the public and decision-makers (e.g., online dashboard)*".

H. REQUEST FOR INTERIM TECHNICAL REPORTS

To enhance public participation in the revised CAP/EIR's development, we request copies

²² Re UPA and Urban Services Boundary (USB), see footnote 15,

²³ The project would encompass 2.876 acres, 8,817 dwelling units, and a medical complex. Epidauros Management Company. Community for Health and Independence, Project Narrative. December 22, 2023.

²⁴ [350 Sac, September 27, 2022](#) (pp. 11-12).

of the following final interim products:

1. Task 3 Technical Memorandum – Emissions Forecasts and Reduction Targets.
2. Task 4 Technical Memorandum – Revised GHG Reduction Measures.

III. COUNTY-IDENTIFIED ALTERNATIVES

Pursuant to §15126.6, the SEIR should describe a range of reasonable alternatives and evaluate their comparative merits. According to the Consultant Scope (p. 10), the County anticipates the draft SEIR “will include an evaluation of three project alternatives”:

- (1) No Action Alternative, “...retention of the current CAP;”
- (2) “[A]lternatives considered but rejected that may be based on previous concepts for the Revised CAP”
- (3) Project Alternative; the revised draft CAP.

Identifying the number and content of alternatives prior to CEQA scoping appears premature, and we are gratified the County is now requesting input regarding this key CEQA element.

Our comments on this section are organized as follows:

- A. NO ACTION ALTERNATIVE
- B. [ALTERNATIVES CONSIDERED BUT REJECTED](#)

A. NO ACTION ALTERNATIVE

1. The No Action alternative represents conditions that would prevail if the project were not adopted; and assumes that the August 2022 final draft, presented to supervisors but not adopted on September 27, 2022, would be adopted instead. Because a qualified CAP obviates further GHG CEQA review, that CAP’s legally insufficient measures if unchallenged would result in cumulatively considerable secondary GHG impacts. Hence the necessity of the 2024 revised draft CAP, which as mentioned above promises to correct eight important deficiencies of that prior version. Any CAP, including the 2024 revision, if not adequately substantiated as feasible, effective, and enforceable would result in such adverse impacts.

B. ALTERNATIVES CONSIDERED BUT REJECTED”

The second alternative would involve, “*alternatives considered but rejected*” by County staff, who relegated them in the prior draft CAP to, “*Appendix F: Additional Options Considered for the CAP – Provides a discussion of strategy options and a list of CAP measures that were considered for inclusion, but excluded ...*”

We have previously commented, with examples, that Appendix F’s “reasons for dismissal” lack credibility.²⁵ In any case, there is no problem re-considering previously rejected measures, but limiting options to those previously rejected seems arbitrary, and unlikely to provide the “range of reasonable alternatives” required by 14 CCR § 5126.6(a).

²⁵ [350 Sac, October 8, 2021. Comment letter](#) (p. 26).

Instead of or in addition to the above we propose a new “smart growth” alternative.

IV. PROPOSED “SMART GROWTH”²⁶ ALTERNATIVE

Given the importance of VMT as a GHG source, Sacramento County’s land use choices will be the major factor in determining the County’s future emissions. The County is well-positioned to consider a “smart growth” alternative, focusing on infill and VMT reduction, because:

- The connection between land use and induced VMT is well-known;^{27 28 29}
- State and regional policy strongly favor infill and VMT reduction;
- Infill and VMT reduction are supported by the County’s 2011 GPU and other plans.
- Courts have recognized that in considering VMT reduction, a “smart growth” land use-alternative is appropriate, including in climate action plans.³⁰

Our comments in this section are organized as follows:

- A. INFILL ELEMENT
- B. [VMT-REDUCTION ELEMENT](#)

A. THE INFILL ELEMENT

1. **State Guidance.** The State has long and clearly maintained that, notwithstanding future phase-out of gasoline-fueled vehicles, reducing VMT through changes in local land use is critical to meeting the State’s GHG targets. SB 375 states:

“Section 1.(c). Greenhouse gas emissions from automobiles and light trucks can be substantially reduced by new vehicle technology and by the increased use of low carbon fuel. However, even taking these measures into account, it will be necessary to achieve significant additional greenhouse gas reductions from changed land use patterns and improved transportation. Without improved land

²⁶ “Smart Growth” is “compact, efficient, and environmentally sensitive pattern of development that focuses future growth away from rural areas and closer to existing and planned job centers and public facilities, while preserving open space and making more efficient use of existing urban infrastructure” (Golden Door Properties, LLC v. County of San Diego (2020) 50 Cal.App.5th 467)

²⁷ Decker, N. et al. Right Type, Right Place - Assessing the Environmental and Economic Impacts of Infill Residential Development through 2030. Next 10. March 28, 2017. Online: <https://www.next10.org/publications/right-housing>.

²⁸ Popovich, N et al. The Climate Impact of Your Neighborhood, Mapped. NY Times. December 13, 2022. Online: <https://www.nytimes.com/interactive/2022/12/13/climate/climate-footprint-map-neighborhood.html> <https://www.nytimes.com/interactive/2022/12/13/climate/climate-footprint-map-neighborhood.html>

²⁹ Karlamangla, S. What’s Your Neighborhood’s Climate Impact? NY Times. February. 6, 2023. Online: <https://www.nytimes.com/2023/02/06/us/california-neighborhood-climate-impact.html>

³⁰ Cleveland National Forest Foundation v. San Diego Association of Governments (2017) 17 Cal.App 5th 413 (“Cleveland III”). Golden Door Properties, LLC v. County of San Diego, 50 Cal. App. 5th 467 (2020)

use and transportation policy, California will not be able to achieve the goals of AB 32", (emphasis added).

- a) CARB Scoping Document.³¹ This State guidance states, "...strategies that support more compact development infill areas...have the greatest potential to reduce emissions (p. 5) ... the State has long been clear that urban infill projects, particularly in high-resource and low-VMT areas, would be generally supportive of the State's climate and regional air quality goals" (p. 20). CARB's "Priority GHG Reduction Strategies",³² include, "... enable mixed-use, walkable, transit-oriented, and compact infill development", and, "Preserve natural and working lands ... guide development toward infill areas and do not convert "greenfield" land to urban uses (p.12).
- b) CARB SCS Guidance. SB 375 requires the Sacramento Council of Governments (SACOG) to adopt a regional Sustainable Community Strategies (SCS) to reduce VMT through coordinated transportation, housing, and land use planning. CARB sets VMT-reduction targets for SACOG and evaluates compliance. Developments consistent with the SCS are relieved of certain CEQA requirements.³³
"Many local agencies have not successfully advanced infill and climate-friendly development as needed, even with many regions identifying priority areas in the SCSs to do that. Too often growth is still being planned for land outside existing communities or built there first".³⁴
- c) CARB Mitigation Recommendations. In the context of SCS consistency, CARB has identified mitigation criteria focused on Sacramento County.³⁵
- d) Office of Planning and Research. *"Infill development is critical to accommodating growth and redesigning our cities to be environmentally- and socially-sustainable. OPR is committed to promoting compact development in order to: Reduce greenhouse gas emissions and improve regional air quality by reducing the distance people need to travel; reduce conversion of agricultural land, sensitive habitat, and open space for new development; reduce costs to build and maintain expensive infrastructure; facilitate healthy and environmentally-friendly active transportation; reduce storm-water runoff resulting in flooding and pollution of waterways; bring vibrancy, community and social connection to neighborhoods".³⁶*

³¹ California Air Resources Board. 2022 Scoping Plan, appendix D, Local Actions. November 2022. Online: https://ww2.arb.ca.gov/sites/default/files/2022-05/2022-draft-sp-appendix-d-local-actions_0.pdf

³² "...designated as 'priority' because they are the GHG reduction opportunities over which local governments have the most authority and that have the highest GHG reduction potential" (CARB, Scoping Plan, 2022, Table 1).

³³ CARB. Sustainable Communities & Climate Protection Program. Online: <https://ww2.arb.ca.gov/our-work/programs/sustainable-communities-climate-protection-program>

³⁴ California Air Resources Board. 2022 Progress Report, California's Sustainable Communities and Climate Protection Act (SB 375) (p. 36). 2022.

³⁵ CARB. Comments on the Sacramento County Transportation Maintenance, Safety, and Congestion Relief Act of 2022—Retail Transactions and Use Tax (Measure A). October 10, 2022. Online: https://drive.google.com/file/d/1-vFaHEOCBJDzs26rNj_3Po9Fk3evyi17/view?usp=sharing.

³⁶ Office of Planning and Research. Infill Development. Online: <https://opr.ca.gov/planning/land->

2. Regional Guidance

- a) SACOG's regional SCS/Blueprint is mandated by SB 375 and focuses on infill, compact development, and related transportation strategies to reduce GHG emissions. *"Prioritizing and incentivizing infill development is one of the most important actions government agencies can take to reduce the amount and distance that people need to drive, manage congestion, foster economic development, and reduce tailpipe emissions that affect air quality and greenhouse gas emissions"*.³⁷
- b) SMAQMD. The Sacramento Metropolitan AQMD publishes GHG thresholds and VMT-reduction guidance.³⁸
- c) Sacramento Regional Transit District (SacRT) provides bus, light rail, paratransit, and other transit services to Sacramento and nearby Counties. SacRT advocates for land use compatible with efficient transit service,

3. The County's Plans

- a) The County General Plan (GP)

Infill is a stated priority in the goals, policies, and implementation measures of multiple GP elements including the Land Use, Housing, Economic Development, and Circulation elements, and the GP's "Land Use Strategies and Policies" statement.³⁹ GP policies focusing on infill include LU-3, LU-4, LU-6, LU-7, LU-8, and LU-68 among others.

GP Policy LU-3 states,

"It is the intent of the County to focus investment of public resources on revitalization efforts within existing communities, especially within commercial corridors, while also allowing planning and development to occur within strategic new growth areas".

Unfortunately, the GP does not define "strategic", so the practical application of policy LU-3 is subject to wide interpretation. However, LU-3 directs that,

"... the County must ensure that resources are not prematurely shifted away from corridor revitalization efforts and buildout of planned communities to plan for development in the new growth areas" (LU Element, p. 25).

Similarly, GP Policy LU-68 directs,

[use/infill-development.](#)

³⁷ SACOG. Establishing Green Zones. Online: <https://www.sacog.org/funding/regional-funding-programs/green-means-go/establishing-green-zones>

³⁸ SMAQMD. Greenhouse Gas Thresholds for Sacramento County. June 2, 2020. Online: <https://www.airquality.org/LandUseTransportation/Documents/SMAQMDGHGThresholds2020-03-04v2.pdf>

³⁹ Sacramento County. 2030 General Plan 2022 Annual Report, Attachment 1. March 28, 2023.

“Give the highest priority for public funding to projects that facilitate and encourage infill, reuse, redevelopment and rehabilitation, mixed-use development, particularly in Environmental Justice Communities, and that will result in per-person vehicle miles traveled lower than the County average ...”

The GP thus recognizes the practical tension between revitalizing existing communities and developing new areas, and cautions that revitalizing existing communities and buildout of already planned and approved communities near the urban core, waiting build-out, should have priority and precede before “shifting” resource to outlying greenfield areas.

The “streamlining” function of the CAP will support development of the GPA projects, drawing staff resources away from infill and buildout of already entitled projects. The SEIR should consider the environmental impacts of such diversion of staff resources to GPA greenfield development.

- b) The County’s Phase 1 CAP.⁴⁰ The Phase 1 CAP was prepared to “*adopt overall strategies and goals*”, and be “*the foundation for the CAP components which follow*”, and to “*augment and inform the Goals, Objectives, Policies and Implementation Measures of the 2030 General Plan*”⁴¹. The Phase 1 CAP discusses infill and VMT reduction at some length, e.g., “*Sacramento County determines land use patterns, which in turn affect ... GHG emissions.... As VMT is directly tied to how communities are planned and developed, reducing VMT will require changes to ... land use ... practice (p. 33)*”.
- c) The County Infill Development Program.⁴² The County adopted an infill Program in 2008` seeking among other co-benefits to, “*improve regional air quality by reducing greenhouse gas emissions (GHGs) and vehicles miles traveled*”⁴³. Work lagged, but in 2020 the County received LEAP funding to update the Program by:
- Assessing and developing a comprehensive inventory of infill sites.
 - Analyzing existing regulations and codes to assess the impediments to development.
 - Developing a comprehensive amendment package with a focus on reducing impediments for appropriate projects.
 - Developing incentives/strategies to maximize infill opportunities.

⁴⁰ Sacramento County. Phase1 Climate Action Plan Framework and Policy Document. October 2011. Online: <https://planning.saccounty.gov/PlansandProjectsIn-Progress/Documents/Climate%20Action%20Plan/CAP%20Strategy%20and%20Framework%20Document.PDF>

⁴¹ Sacramento County. “Resolution of the Board of Supervisors of the County of Sacramento, State of California Adopting a Strategy and Framework Document”. November 9, 2011

⁴² Sacramento County Infill Development Program. Online: <https://planning.saccounty.gov/Programs/Pages/InfillDevelopmentProgram.aspx>

⁴³ Sacramento County. Board Agenda Item 10, Adopt Resolution Authorizing the Planning Director To Execute A Contract For Preparation Of The Infill Program Update With PlaceWorks Funded By A Local Early Action Planning Grant In The Amount Of \$249,978 With A Contingency Amount of \$25,000. August 23, 2022 .

Project completion was scheduled for September, 2023.

- d) The County's Green Means Go Zones. In partnership with SACOG, Sacramento County has identified and nominated five priority infill "Green Zones",⁴⁴ for funding through state Regional Early Action Program grants. Green Zones must be within infill areas defined by SACOG's 2020 MTP/SCS, planned for growth, and supported by local policies. They are, South Sacramento-Stockton Boulevard-14th Avenue to Mack Rd; Fair Oaks Blvd Corridor; Arden Way Corridor; Butterfield RT Station; and North Watt Corridor
- e) The 2022 Urban Land Institute Advisory Services Panel.⁴⁵ In November 2022, Sacramento County partnered with SACOG and the City of Folsom in a weeklong Panel centered on accelerating housing along suburban commercial corridors. The panel developed recommendations to facilitate infill residential development on North Watt Avenue in Sacramento County.
- f) The Re-Envision West Arcade Plan. In 2022 the County completed a two-year planning project to create safer and more appealing walking, rolling, bicycling, and driving conditions in the West Arcade community
- g) Other Related Activities ⁴⁶
 - (1) Completion of Active Transportation Plan.
 - (2) Amendments to facilitate Vineyard projects buildout.
 - (3) Update Stockton Boulevard SPA.
 - (4) Completion of ADU construction plans.
 - (5) In addition, the County has listed some 14 other plans and projects which it considers support infill.⁴⁷

4. The County's Sprawl Bias

Notwithstanding the above policies and plans, in practice Sacramento County has favored sprawl as its primary growth-accommodation strategy. The County has entitled a large number of dwelling units in areas disjunct from existing urbanization, and plans to entitle many more (ATTACHMENT 4) .

- a) GPU Policy LU 119. As the County explains, "*...in 2011, the General Plan added policies ... to allow applicants to request an expansion of the UPA anywhere within the USB*"⁴⁸ regardless of demand or existing capacity. The County's intent was to let

⁴⁴ The County's five "Green Zones" are South Sacramento-Stockton Boulevard-14th Avenue to Mack Rd; Fair Oaks Blvd Corridor; Arden Way Corridor; Butterfield RT Station; and North Watt Corridor.

⁴⁵ Urban Land Institute (ULI) Advisory Services Panel. Online: <https://sacramento.uli.org/about/advisory-services/2022-uli-advisory-services-panel-with-sacog/>

⁴⁶ Sacramento County. 2030 General Plan 2022 Annual Report, Attachment 1. March 28, 2023.

⁴⁷ Sacramento County. Board of Supervisor's Meeting, Adoption Of The Communitywide Climate Action Plan, Attachment 3, Response to Comments (pp. 13-14). September 27, 2022.

⁴⁸ The Urban Policy Area (UPA) nominally establishes the area available for development during the current planning period. The Urban Services Boundary (USB) is the ultimate growth boundary established in the General Plan to demarcate the area beyond which urban growth is never expected to occur or associated County services provided. Several GPA projects now in planning lie outside both the UPA and USB.

- the market determine the need and location for new growth...*⁴⁹ As discussed above in comment II.F, the County's invitation to sprawl development far from existing urbanization and rejection of densification policies, has shifted public and private resources from infill to sprawl.
- b) GPA Projects. Since 2011, the County has approved planning for six large GPA projects outside the adopted UPA growth boundary, so far approving two. To our knowledge, the County has never rejected a GPA application, either for planning or final approval.⁵⁰
 - c) Excess Entitlements. As detailed in previous comments,⁵¹ the County has entitled far more sprawl DU's than needed to accommodate expected growth, and plans to approve more. Excess entitlements far exceeding market demand will result in partially built-out tracts, with foreseeable GHG and other environmental impacts not subjected to prior CEQA analysis. The County has yet to respond to our remarks.
 - d) County's Solution to Sprawl. The County has asserted that VMT induced by disjunct development will be reduced as further nearby greenfield projects are developed, creating urban mass – i.e., the solution to sprawl is more sprawl.⁵²
 - e) County's Objection to SACOG SCS Draft Projections. Per comment II.C above, the County proposes to "augment" SACOG's draft SCS 2025 projections to reflect more County sprawl. The County has reportedly asked SACOG to modify the projections to show 333 percent more County sprawl and 50 percent less infill than SACOG's plan, which would undermine the SCS's ability to achieve its VMT-reduction goal.⁵³

B. VMT-REDUCTION ELEMENT

1. **State, Regional, and County support** for VMT reduction measures is similar to that identified above for Infill. We recognize that the prior draft CAP includes several VMT reduction measures. Potential measures include, but are not limited to: T
 - Transit-oriented development
 - EV/ZEV support
 - Transit and micro-transit
 - Active transportation
 - Shared mobility
 - Travel demand management

⁴⁹ Sacramento County. 2030 General Plan 2020 Annual Report. March 24, 2021

⁵⁰ 350 Sac. [Fact Sheet 3, Sacramento County CAP Allows More Sprawl and GHG Pollution. March 2022.](#)

⁵¹ [350 Sac. Comment letter, April 9, 2021](#) (p. 2).
[350 Sac. Comment Letter, October 8, 2021](#) (p. 11).
[350 Sac. Comment Letter, September 27, 2022](#) (p. 8).

⁵² Sacramento County. Jackson Township Draft Environmental Impact Report (Recirculated), pp. 20-41, Table SI-2. May 2021.

⁵³ Philp, Tom. Sacramento Bee, Sacramento supervisors are addicted to sprawl. It could cost our region dearly. December 7, 2023. Online:
<https://www.sacbee.com/opinion/article281716338.html#storylink=cpy>

- Complete streets
- Incentives
- Pricing disincentives.

2. **EV/ZEV Support.** We support the current NOP response comments submitted by the Sacramento Electric Vehicle Association. We endorse and recommend using the rate of EV adoption, as documented by the California Energy Commission in collaboration with the Department of Motor Vehicles, as the most meaningful parameter to track and report the success of EV-related measures.⁵⁴

V. APPLICATION OF CAP TO GENERAL PLAN AND UPDATE

The 2011 GPU's planning horizon is 2030, and updating will be a multi-year process. Supervisors budgeted \$250,000 for FY 2022-23 to initiate scoping and coordination work. The SEIR should indicate how the CAP will integrate with the current GP 2030, and into the future GP update process.

As always, our aim to support the County's adoption of an effective, CEQA-compliant CAP. Thank you for considering our comments.

Sincerely,



Oscar Balaguer, Chair
350 Sacramento CAP Team

Cc: Liaisons, CCL, ECOS, SCC, Sierra Club, Sac EV

⁵⁴ California Energy Commission. California Energy Commission Zero Emission Vehicle and Infrastructure Statistics. Online: <http://www.energy.ca.gov/zevstats>.

SACRAMENTO COUNTY CLIMATE MITIGATION - DEFERRED AND DISREGARDED PROMISES -

October 2011 – CAP Strategy and Framework Document³

The *Strategy Document* is meant to, “...adopt overall strategies and goals” which the community-wide CAP would “flesh out”. It states that, “reducing transportation-related ... emissions is critical... [and] requires a shift in long-standing ... thinking related to development ... [s]hifting development patterns to ... compact development”.

NOT DONE. The current draft CAP does not discuss shifting from continued sprawl.

November 2011 – General Plan Update & Environmental Impact Report¹

CEQA required the County to mitigate the GHG impacts of its 2011 General Plan update². The County deferred to promised future actions, including:

- Adopt a “detailed” Climate Action Plan “within one year”.
- Complete a GHG emissions inventory every three years.
- Adopt a Green Building Program by 2012, and update at minimum every five years.
- Adopt a development fee to fund the CAP.
- Adopt the promised mitigation into the General Plan

NOT DONE. No CAP adopted. Two Inventories completed out of five. No Green Building program established, or development fee adopted. Mitigation as adopted into the General Plan was substantially weakened.

June 2012 – Government Operations CAP⁴

The *Gov Ops CAP* described County operation emission-reductions:

- Implement 25 specified measures to reduce GHG emissions by 6,363 MTCO₂e/yr by 2020.
- Develop metrics to assess effectiveness of the Plan
- Report progress to elected officials and public, and update CAP as needed.

NOT DONE. No metrics, reports, or updates have been presented. The last draft CAP presents a Gov Ops plan with no evident correlation to or mention of the 2012 plan.

December 2020 – Climate Emergency Declaration⁵

The County’s CED directs that the CAP, “ ... shall explain the County’s approach to ... achieve carbon neutrality by 2030, and ... Countystaff shall evaluate the resources necessary ... and ... emergency action required ... [and] shall identify [funding] gaps and... recommendations”.

NOT DONE. The current draft CAP does not substantively explain how the County can achieve the CED’s goal; evaluate needed resources; or identify emergency actions or recommendations. The CAP delegates this work to a future proposal to be developed by a volunteer Task Force

¹ Sacramento County, General Plan 2030 FEIR, Vol II, “Mitigation Measures”, 2011 Page 12-39.

² Pursuant to the California Environmental Quality Act.

³ Sacramento County, Phase 1 CAP, Strategy and Framework Document, November 9, 2011.

⁴ Sacramento County, Climate Action Plan for Government Operations, June 2012.

⁵ Sacramento County, *Resolution Declaring A Climate Emergency*, December 2020, 3rd and 4th Resolves

SACRAMENTO COUNTY CLIMATE ACTION PLAN – HISTORY –

To a scientific certainty, unless global governments at every level rapidly transition from fossil fuels, their citizens will face progressively severe weather catastrophes. It is also widely recognized that this difficult transition is not happening fast enough.

Sacramento County began planning a climate action plan (CAP) in 2008. More than 15 years later, the County has not yet adopted a CAP. A review of the County's efforts may offer an instructive case study on how institutional inertia can stymie staff and public efforts to effectively complete what is arguably the most consequential planning effort the County will ever undertake. Key milestones in the County's process are listed below.

2007. SB 97 amends the California Environmental Protection Act (CEQA) to require analysis and mitigation of greenhouse gases (GHG) during CEQA process, effective March 18, 2010.

April 29, 2008. Sacramento County staff presents to the Board of Supervisors background information on climate change, State regulations, and associated opportunities and challenges.

May 27, 2008. Supervisors direct staff to return to the Board as needed with updates and work products requiring review and action.

May 12, 2009: Staff presents the draft Phase 1 CAP, the first of various work products prepared to address "regulatory drivers and local priorities". The draft includes a GHG emissions inventory, and describes how the County can integrate climate protection into planning and resource management, adopt green building practices, promote healthy, pedestrian-friendly communities, and curb vehicle emissions.

June 2, 2009: Supervisors allocate a portion of the County's federal Energy Efficiency Conservation Block Grant Program (EECBGP) grant to fund the Phase 2 CAP (a prime purpose of the EECBGP is to "reduce fossil fuel emissions").

August 25, 2010. At a Supervisor workshop, staff introduces the Phase 2 Implementation Plan which will include two phases: a 2A County government operations CAP, and a 2B communitywide CAP. Staff presents a timeline to provide, "adoption of a Phase 2 CAP within one year of the updated General Plan's adoption".

November 9, 2011. Supervisors adopt/certify a General Plan Update/Final Environmental Impact Report (FEIR), promising the County will:

- Adopt a Phase 1 CAP, "Framework and Policy Document",¹ which presents "overall strategies and goals"; and is meant to "augment and inform the Goals, Objectives, Policies and Implementation Measures of the 2030 General Plan"; and to be, "the foundation for the CAP components which follow".
 - Adopt a Phase 2B Communitywide CAP, "within one year... that includes economic analysis and detailed programs and performance measures, including timelines".
-

-
- Complete other specified GHG-reduction measures.

The General Plan update includes many policies supporting compact, climate-friendly growth; but it also for the first time creates a pathway for urban development outside the County's adopted urban growth boundaries. The Phase 1 CAP is adopted concurrently with the General Plan. The County subsequently fails almost all its GHG commitments. The Phase 1 Plan and General Plan each fail to contain or substantially weaken a number of measures which the FEIR specified were to be included. The County did not, as it promised, adopt the Phase 2B Communitywide CAP within one year (it is still outstanding); adopt a Green Building Program by 2012 and update every five years; provide triennial GHG inventories;² timely adopt GHG thresholds of significance;³ or enact a fee on new development to fund the CAP.

September 11, 2012. Using EECBGP funds, the County adopts a Phase 2A Government Operations CAP, specifying products and reports to be delivered. There is no evidence that these were ever produced. The County's recent drafts of a County Operations CAP do not mention the 2012 CAP or any accomplishments.

2016. County staff conducts targeted public outreach regarding the Phase 2B Communitywide CAP.

May 24, 2017. With the Communitywide CAP five years overdue, the County schedules a Board hearing to consider. Staff presents a base-year 2015 GHG Inventory; Vulnerability Assessment; and four potential GHG-reduction measures. Some Supervisors balk at the measures. Supervisors and staff state that staff will return with more detailed proposals in late 2017; however, they do not. Subsequently the County claims that the CAP is delayed pending the outcome of litigation in another jurisdiction (*Sierra Club/Golden Door v. County of San Diego*).

June 11, 2019. 350 and allies request CAP funding be provided in the County FY 2019-2020 Budget. There is no response.

January 27, 2020. 350 Sac and allies advise County in formal comments that since the 2011 commitment to adopt a CAP, four other jurisdictions in the SACOG region have adopted one, and three more are currently in active draft, notwithstanding pending litigation.

January 28, 2020. 350 Sac comments at the final adoption hearing for Mather South Specific Plan that approval would be inconsistent with the County's promise to address GHG emissions via a CAP, and therefore inconsistent with CEQA. Three Board members support CAP initiation. In February, 350 Sac and allies meet with the three Supervisors and with County staff, and request that the Board formally consider the CAP at an upcoming Annual General Plan Report hearing.

February 18, 2020. 350 Sac and allies write County staff, requesting that the 2019 Annual General Plan Report include a discussion of CAP status.

April 6, 2020. 350 and allies write Supervisors, thank for agreeing to discuss the CAP at an April 7, 2020 hearing on the County's annual general plan report; note that the report states CAP work won't begin until "a path forward is made clear"; and asks the Board to direct staff to begin work.

April 7, 2020. Supervisors direct staff to initiate CAP work.

August 12, 2020. County initiates a "Focused Stakeholder Group" including environmental, equity, and building industry representatives. The Group meets five times. Absent professional facilitation; a discussion of possible shared goals; and a focus on participant interaction, a collaborative dynamic is not achieved. Meeting frequency decreases.

May 11 2021. At the fifth meeting of the Stakeholders Group, staff advises intent to use an Addendum to the 2011 General Plan FEIR for CEQA compliance. 350 Sac demurs at meeting and subsequently in writing. Staff does not schedule further meetings.

January 2021. County issues Administrative Draft CAP. 350 Sac and others comment to the effect that its measures are not substantiated as feasible, effective, and enforceable .

March 2021. County issues Public Draft CAP . 350 Sac and others comment to the effect that its measures are not substantiated as feasible, effective, and enforceable.

September 2021. County issues Final Draft CAP and an EIR Addendum to the 2011 County General Plan FEIR. 350 Sac and others comment to the effect that its measures are not substantiated as feasible, effective, and enforceable, and the Addendum is inconsistent with CEQA requirements.

February 2022. County issues Revised Final Draft CAP. 350 Sac and others comment to the effect that its measures are not substantiated as feasible, effective, and enforceable, and the Addendum is inconsistent with CEQA requirements.

August 2022. County issues second Revised Final Draft CAP; and a revised Addendum to the 2011 FEIR . 350 Sac comments to the effect that the CAP measures are not substantiated as feasible, effective, and enforceable, and the Addendum is inconsistent with CEQA requirements.

September 27, 2022. Staff presents the second Revised Final Draft CAP to Supervisors for adoption. 350 and others provide extensive written and oral comment. Supervisors decline to approve the CAP, request revision, and direct staff to bring it back to the Board's December 6, 2022 meeting. or earlier. The December meeting agenda states in regard to the CAP, "THIS ITEM WILL BE DROPPED", without further explanation.

October 13, 2023. Responding to multiple requests, staff provides 350 Sac a copy of a June 2023 consultant contract/work statement to revise the CAP and prepare a Supplemental EIR (SEIR). The specified work appears to address a number of the concerns expressed by 350 Sac and others since January 2021. Public review of the revised draft CAP is scheduled for May 2024.

December 14, 2023. County publishes a Notice of Preparation for the SEIR and schedules a January 10, 2024 scoping meeting.

**NATIVE CARBON SEQUESTRATION
IN
SACRAMENTO COUNTY SOIL –
ASSESSMENT, AVOIDANCE, AND MITIGATION**

A. Importance of Maintaining Natural Carbon Sequestration

Permanent loss of carbon sequestration due to construction-related vegetation and soil disturbance from greenfield development is among the reasonably foreseeable secondary impacts of CAP adoption the SEIR should evaluate. The California Resource Agency's Statement of Reasons for adopting CEQA Guidelines §15183.5 notes that, "*All substantial evidence regarding potential impacts of a project must be considered in an IS, even if the particular potential impact is not listed in The Resources the Appendix G checklist. (Protect the Historic Amador Waterways, 16 Cal.App.4th at 1109.)*"¹

The Sacramento Municipal Utility District (SMUD) has determined that natural soils and vegetation in Sacramento County sequester large amounts of carbon which are released with landscape disturbance, and found that such sequestration loss can be modeled and quantified under different development scenarios, allowing identification of mitigation choices.²

The California Air Resources Control Board (CARB) states:

*"Although natural and working lands can remove carbon dioxide from the atmosphere and sequester it in soil and vegetation, disturbances such as severe wildfire, land degradation, and conversion can cause these landscapes to emit more carbon dioxide than they store.... Protect[ng] land from conversion to more intensified uses by increasing conservation opportunities and pursuing local planning processes that avoid greenfield development" [can mitigate this loss].*³

B. Losses of Carbon Caused by Greenfield Development Should be Mitigated

SMUD has quantified the current landscape carbon storage in Sacramento County; forecasted Sacramento County landscape carbon storage under varied land use projections, and developed a method for incorporating carbon as an explicit conservation benefit in land use decision-making. Among the findings are:

- There is relatively little overall difference between the footprints of the business-as-usual and compact new growth scenarios, but the infill scenario retained a higher share of landscape carbon,
- The business-as-usual scenario would result in new emissions of 5.2 million MTCO₂e (via a reduction in the 2014 baseline stored carbon estimate), which exceeds the 2015 emissions of unincorporated Sacramento County.
- This information provides opportunity to leverage land use planning to maintain and

¹ Resources Agency, December 2009, p. 75.

² Sacramento Municipal Utility District (SMUD). Sacramento County Landscape Carbon Assessment – Initial Study, pp. 1-2. 2017

³ CARB. Natural and Working Lands Climate Change Implementation Plan - Concept Paper, p. 2. 2018.

expand landscape carbon stocks in Sacramento County.⁴

C. Tools are Available to Model Both Carbon Loss and Mitigation Options

“Planning for landscape carbon storage can make a meaningful mitigation contribution, and the analytical tools to do so in a spatially-explicit manner exist today for the Sacramento region.”⁵

SMUD has developed a GIS-based model that incorporates best practices and draws land classification data from USGS’s LANDFIRE program, soil carbon densities from the NRCS’s gSSURGO database, and biomass carbon densities from the California Air Resources Board.⁶

CARB’s *California Natural and Working Lands Carbon and Greenhouse Gas Model (CALAND)* is a carbon accounting model that assesses the projected GHG benefits of conservation, restoration, and management activities.⁷

⁴ Sacramento Municipal Utility District. Sacramento County Landscape Carbon Assessment Initial Study. December 2017, pp. 2-4.

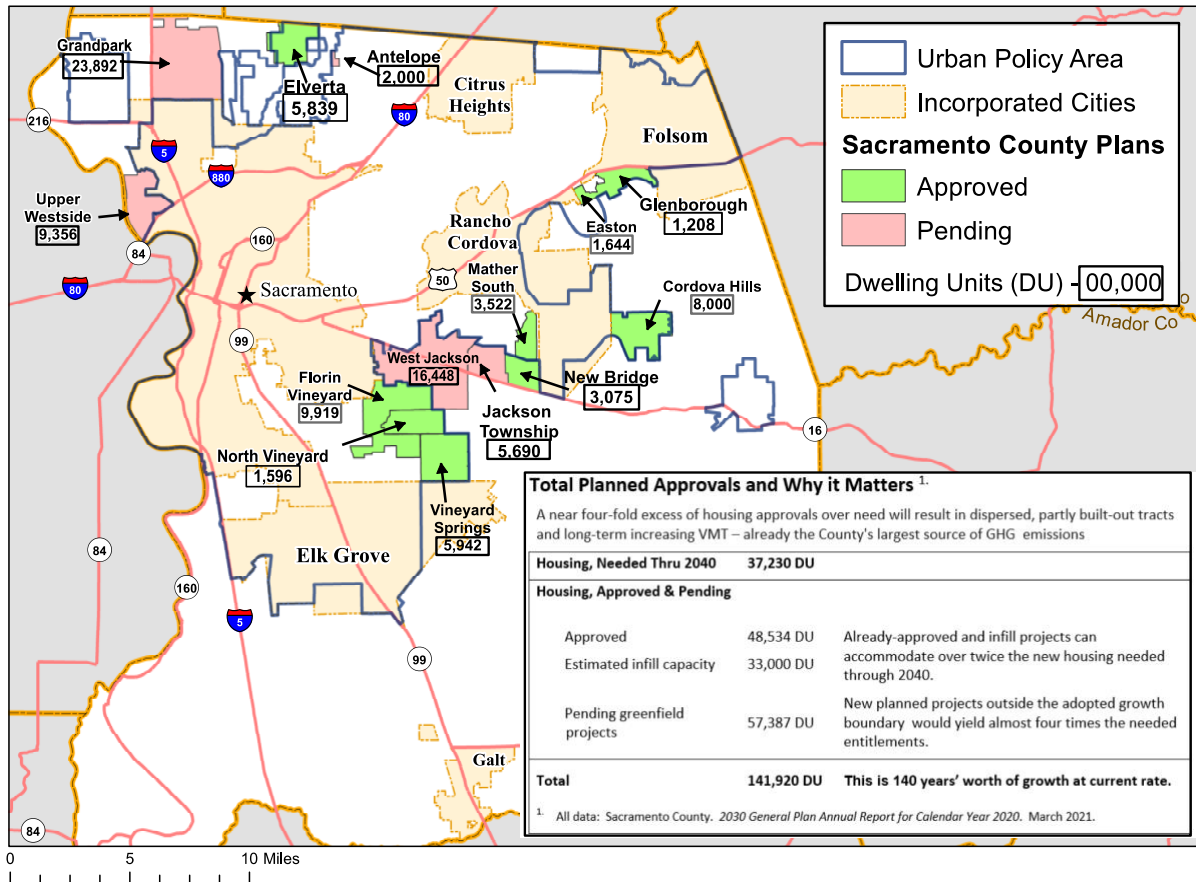
⁵ SMUD, 2017, p. 7.

⁶ SMUD, 2017.

⁷ Natural Resources Agency. California Natural and Working Lands Carbon and Greenhouse Gas Model (CALAND). July 2017. Online: https://resources.ca.gov/CNRALegacyFiles/wp-Content/uploads/2017/01/CALAND-Technical-Description_9.22.17.pdf.

SACRAMENTO COUNTY APPROVED AND PENDING MAJOR RESIDENTIAL DEVELOPMENTS

Sacramento County's Excess Housing Approvals will Increase GHG Emissions



**SACRAMENTO COUNTY GHG COMMITMENTS
 FEIR / GPU INCONSISTENCIES**

GHG mitigation as transcribed in the General Plan was substantially weakened.

FEIR GHG mitigation measure CC-2 included a proviso that the measures would be adopted in the GPU as policy statements. The CEQA Findings accurately quote GHG mitigation measure CC-2, followed by the statement, “*Actual text in the draft Land Use Element that complies with CC – 2:*”. However, the succeeding recitation of CC-2 is substantially weaker than that in the FEIR. The Findings do not acknowledge the difference or explain in what sense the weaker version “complies” with the original language.

The following table displays both versions, with underlining to high-light discrepancies. In sum, the general plan version substantially weakens CAP adoption and funding commitments; and removes mitigation relating to green buildings, fees on new development, and targets for new development (targets were eventually adopted after projects were approved by the County over 350’s objections).

SAC CO GHG COMMITMENTS - FEIR / GPU INCONSISTENCIES			
FEIR, VOL II, p. 12-39, “MITIGATION MEASURES”		GPU LU-115, “IMPLEMENTATION MEASURES”	
CC-2	...the following shall be included [in the GPU] as implementation measures...		
CC-2, A.	... County shall adopt a <i>first-phase Climate Action Plan</i> , concurrent with [GPU] update, that contains...: .	F	Adopt ... a first-phase Climate Action Plan, concurrent with ...[GPU] approval
CC-2. A.a.	... County shall complete a GHG... inventory every three years ...	G.	... complete a GHG emissions inventory every three years
CC-2. A.b.	... <u>County shall adopt a green building program by 2012...updated... every 5 years.</u> :		[no mention]
CC-2, A.c.	... <u>County shall enact a Climate Change Program that includes</u> ...		[no mention]
CC-2, A.c.i	... <u>includes a fee</u> ...for all new development ...[to fund CAP]...oversight and maintenance ...	I.	... The County shall develop sustainable funding ... which <u>may include a fee</u> ...[on] development...
CC-2, A.c.ii	... <u>reduction targets that apply to new development</u>		[no mention]

California Department of Transportation

DISTRICT 3
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January 9, 2024

GTS #03-SAC-2023-01584
SCH #2023120386

Mr. Todd Smith
Planning Director
Planning and Environmental Review
827 7th Street, Room 225
Sacramento, CA 95814

PLNP2016-00063 Sacramento County Climate Action Plan

Dear Mr. Smith:

Thank you for including the California Department of Transportation (Caltrans) in the review process for the project referenced above. We reviewed this local development for impacts to the State Highway System (SHS) in keeping with our mission, vision, and goals, some of which includes addressing equity, climate change, and safety, as outlined in our statewide plans such as the California Transportation Plan 2050, Caltrans Strategic Plan, and Climate Action Plan for Transportation Infrastructure.

The CAP would apply to existing and proposed development in unincorporated Sacramento County, which encompasses approximately 496,083 acres or 775 square miles, and County operations. Sacramento County is in the northern portion of California's Central Valley. The overall objective of the 2024 CAP is to reduce GHG emissions generated from activities within the unincorporated county (community) and GHG emissions generated by County facilities and operational activities throughout the county, including facilities and operations located within incorporated cities, to meet or exceed GHG reduction goals under State laws. The CAP will establish a GHG emissions reduction strategy informed by a baseline inventory and forecast emissions and establish a strategy for adapting to the impacts of climate change. Based on the Notice of Preparation of a Draft Environmental Impact Report (EIR) provided, Caltrans has the following requests and recommendations:

Freeway Operations

In order to reduce GHG and VMT, SAC County is preparing a plan to integrate its public transportation plan with SACRT and local infrastructure. Caltrans supports the Goals and Objectives proposed by the CAP. However, this CAP document only provides high level scope and objectives. It is difficult to identify what Caltrans' roles and responsibilities are to help Sacramento County to achieve its GHG and VMT reduction goal. It is recommended to have a meeting with Sacramento County and generate an Action Items List to identify what Caltrans can do/perform to accomplish the objective from the CAP. Also, we can mention that the County would be benefited greatly with the expansion of transit to better serve the whole County and reduce VMT by giving people other transportation options.

Traffic Safety

The comments are limited without a more concrete less aspirational document. The improvements that are laid out are welcome especially with regard to pedestrian and bike safety. The GHG reduction measures mention working in partnership with various agencies to promote ped/bike infrastructure and update the pedestrian and bicycle master plans. We hope there is follow up and these programs will lead to projects (development of a pedestrian capital improvement program is promising for example).

Complete Streets

Caltrans in cooperation with Sacramento County to reduce GHG emissions through the implementation of complete streets improvements county wide. Caltrans to evaluate multi-modal transportation improvements, including safety improvements across a variety of travel modes, changes in land use or other regulations to attract community level economic development, and community identification and place-making. Implementation of Pedestrian Master Plan, updating community and corridor plans to foster robust transit, bike and pedestrian improvements, infill development and establish a focus on ride share and employee transportation plans (may include telework solutions).

Forecasting & Modeling

The Sacramento County Climate Action Plan (CAP) is aimed at lessening greenhouse gas emissions (GHGs) to at or below the GHG emissions targets as per state policy. Please provide a report documenting the forecast GHG emissions with and without the alternative VMT reduction mitigation strategies.

Mr. Todd Smith, Planning Director
January 9, 2024
Page 3

Encroachment Permit

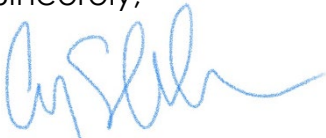
Any project along or within the State's ROW requires an encroachment permit issued by Caltrans. To apply, a completed encroachment permit application, environmental documentation, and five sets of plans clearly indicating State ROW must be submitted to:

Hikmat Bsaibess
California Department of Transportation
District 3, Office of Permits
703 B Street
Marysville, CA 95901

Please provide our office with copies of any further actions regarding this project. We would appreciate the opportunity to review and comment on any changes related to this development.

If you have any questions regarding these comments or require additional information, please contact Satwinder Dhatt, Local Development Review Coordinator, by phone (530) 821-8261 or via email at satwinder.dhatt@dot.ca.gov.

Sincerely,



GARY ARNOLD, Branch Chief
Local Development Review, Equity and Complete Streets
Division of Planning, Local Assistance, and Sustainability
California Department of Transportation, District 3



State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
North Central Region
1701 Nimbus Road, Suite A
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GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director



January 29, 2024

Todd Smith, Planning Director
Sacramento County
827 7th Street, Room 225
Sacramento, CA 95814
CEQA@saccounty.gov

Subject: 2024 SACRAMENTO COUNTY CLIMATE ACTION PLAN (CAP)
DRAFT SUBSEQUENT ENVIRONMENTAL IMPACT REPORT (DSEIR)
SCH No. 2023120386

Dear Todd Smith:

The California Department of Fish and Wildlife (CDFW) received and reviewed the Notice of Preparation of a Draft Subsequent Environmental Impact Report (DSEIR) from Sacramento County (County) for the 2024 Sacramento County Climate Action Plan (Project) in Sacramento County pursuant the California Environmental Quality Act (CEQA) statute and guidelines.¹

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish, wildlife, plants and their habitats. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may need to exercise its own regulatory authority under the Fish and Game Code (Fish & G. Code).

CDFW ROLE

CDFW is California's Trustee Agency for fish and wildlife resources and holds those resources in trust by statute for all the people of the State (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a)). CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (*Id.*, § 1802.). Similarly, for purposes of CEQA, CDFW provides, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

¹ CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

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CDFW may also act as a Responsible Agency under CEQA. (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381.) CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code. As proposed, for example, the Project may be subject to CDFW's lake and streambed alteration regulatory authority. (Fish & G. Code, § 1600 et seq.) Likewise, to the extent implementation of the Project as proposed may result in "take" as defined by State law of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), the project proponent may seek related take authorization as provided by the Fish and Game Code.

PROJECT DESCRIPTION SUMMARY

The Project site is located in existing and proposed development in unincorporated Sacramento County, which encompasses approximately 496,083 acres or 775 square miles, and County operations. It extends from the delta formed at the confluence of the Sacramento and San Joaquin Rivers in the southwest to Folsom Lake and the Sierra Nevada foothills in the northeast. It is bordered by eight counties: El Dorado, Amador, San Joaquin, Contra Costa, Solano, Yolo, Sutter, and Placer.

The Project consists of both quantified and non-quantified activities/measures that will reduce greenhouse gas (GHG) emissions generated from activities within the unincorporated county (community) and GHG emissions generated by County facilities and operational activities throughout the county, including facilities and operations located within incorporated cities, to meet or exceed GHG reduction goals under State laws. The activities/measures are based on the 2022 Final CAP. The following sustainability planning strategies were considered when developing the activities/measures:

1. Clean Energy: Focuses on providing clean and affordable sources of energy for the County by increasing the use of renewables.
2. Low and Zero Emissions Vehicles and Equipment: Support electrification and alternative fuels in on- and off-road vehicles and equipment, as well as fuel efficiency measures that would reduce the amount of gasoline and diesel fuel consumed.
3. Green Buildings: Reduce commercial and residential building energy and water consumption, and incorporate design features that reduce or eliminate the need for fossil fuels.
4. Natural and Working Lands: Sequester carbon dioxide from the atmosphere by focusing on habitat preservation, increasing urban forest and connected open space, and carbon farming.
5. Reduced Driving and Alternative Transportation Modes: Reduce emissions-generating activities by promoting public transit, and alternative modes of transportation such as biking and walking, carpooling, and transit-oriented development.

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The 2024 CAP will establish a GHG emissions reduction strategy informed by a baseline inventory and forecast emissions, and establish a strategy for adapting to the impacts of climate change.

COMMENTS AND RECOMMENDATIONS

CDFW offers the comments and recommendations presented below to assist Sacramento County in adequately identifying and/or mitigating the Project's significant, or potentially significant, impacts on biological resources. The comments and recommendations are also offered to enable CDFW to adequately review and comment on the proposed Project with respect to impacts on biological resources. CDFW recommends that the forthcoming DSEIR address the following:

Project Description

The Project description should include the whole action as defined in the CEQA Guidelines § 15378 and should include appropriate detailed exhibits disclosing the Project area including temporary impacted areas such as equipment stage area, spoils areas, adjacent infrastructure development, staging areas and access and haul roads if applicable.

As required by § 15126.6 of the CEQA Guidelines, the DSEIR should include an appropriate range of reasonable and feasible alternatives that would attain most of the basic Project objectives and avoid or minimize significant impacts to resources under CDFW's jurisdiction.

Assessment of Biological Resources

Section 15125(c) of the CEQA Guidelines states that knowledge of the regional setting of a project is critical to the assessment of environmental impacts and that special emphasis should be placed on environmental resources that are rare or unique to the region. To enable CDFW staff to adequately review and comment on the Project, the DSEIR should include a complete assessment of the flora and fauna within and adjacent to the Project footprint, with emphasis on identifying rare, threatened, endangered, and other sensitive species and their associated habitats. CDFW recommends the DSEIR specifically include:

1. A general assessment of all habitat types located within the Project footprint, and a generalized map that identifies the location of each habitat type. CDFW recommends that floristic, alliance- and/or association-based mapping and assessment be completed following, *The Manual of California Vegetation*, second edition (Sawyer 2009). Adjoining habitat areas should also be included in this assessment where site activities could lead to direct or indirect impacts offsite. Habitat mapping at the alliance level will help establish baseline vegetation conditions.
2. A general biological inventory of the fish, amphibian, reptile, bird, and mammal species that are present or have the potential to be present within each habitat

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type onsite and within adjacent areas that could be affected by the Project. CDFW recommends that the California Natural Diversity Database (CNDDDB), as well as previous studies performed in the area, be consulted to assess the potential presence of sensitive species and habitats. A nine United States Geologic Survey 7.5-minute quadrangle search is recommended to determine what may occur in the region, larger if the Project area extends past one quad (see *Data Use Guidelines* on the Department webpage www.wildlife.ca.gov/Data/CNDDDB/Maps-and-Data). Please review the webpage for information on how to access the database to obtain current information on any previously reported sensitive species and habitat, including Significant Natural Areas identified under Chapter 12 of the Fish and Game Code, in the vicinity of the Project. CDFW recommends that CNDDDB Field Survey Forms be completed and submitted to CNDDDB to document survey results. Online forms can be obtained and submitted at: <https://www.wildlife.ca.gov/Data/CNDDDB/Submitting-Data>.

Please note that CDFW's CNDDDB is not exhaustive in terms of the data it houses, nor is it an absence database. CDFW recommends that it be used as a starting point in gathering information about the *potential presence* of species within the general area of the Project site. Other sources for identification of species and habitats near or adjacent to the Project area should include, but may not be limited to, State and federal resource agency lists, California Wildlife Habitat Relationship System, California Native Plant Society Inventory, agency contacts, environmental documents for other projects in the vicinity, academics, and professional or scientific organizations.

3. A complete and recent inventory of rare, threatened, endangered, and other sensitive species located within the Project footprint and within offsite areas with the potential to be affected, including California Species of Special Concern and California Fully Protected Species (Fish & G. Code § § 3511, 4700, 5050, and 5515). Species to be addressed should include all those which meet the CEQA definition (CEQA Guidelines § 15380). The inventory should address seasonal variations in use of the Project area and should not be limited to resident species. CDFW recommends Sacramento County rely on survey and monitoring protocols and guidelines available at: www.wildlife.ca.gov/Conservation/Survey-Protocols. Alternative survey protocols may be warranted; justification should be provided to substantiate why an alternative protocol is necessary. Acceptable species-specific survey procedures should be developed in consultation with CDFW and the U.S. Fish and Wildlife Service, where necessary. Some aspects of the Project may warrant periodic updated surveys for certain sensitive taxa, particularly if the Project is proposed to occur over a protracted time frame, or in phases, or if surveys are completed during periods of drought or deluge.
4. Information on the regional setting that is critical to an assessment of environmental impacts, with special emphasis on resources that are rare or unique to the region (CEQA Guidelines § 15125[c]).

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Analysis of Direct, Indirect, and Cumulative Impacts to Biological Resources

The DSEIR should provide a thorough discussion of the Project's potential direct, indirect, and cumulative impacts on biological resources. To ensure that Project impacts on biological resources are fully analyzed, the following information should be included in the DSEIR:

1. The DSEIR should define the threshold of significance for each impact and describe the criteria used to determine whether the impacts are significant (CEQA Guidelines, § 15064, subd. (f)). The DSEIR must demonstrate that the significant environmental impacts of the Project were adequately investigated and discussed, and it must permit the significant effects of the Project to be considered in the full environmental context.
2. A discussion of potential impacts from lighting, noise, human activity, and wildlife-human interactions created by Project activities especially those adjacent to natural areas, exotic and/or invasive species occurrences, and drainages. The DSEIR should address Project-related changes to drainage patterns and water quality within, upstream, and downstream of the Project site, including: volume, velocity, and frequency of existing and post-Project surface flows; polluted runoff; soil erosion and/or sedimentation in streams and water bodies; and post-Project fate of runoff from the Project site.
3. A discussion of potential indirect Project impacts on biological resources, including resources in areas adjacent to the Project footprint, such as nearby public lands (e.g., National Forests, State Parks, etc.), open space, adjacent natural habitats, riparian ecosystems, wildlife corridors, and any designated and/or proposed reserve or mitigation lands (e.g., preserved lands associated with a Conservation or Recovery Plan, or other conserved lands).
4. A cumulative effects analysis developed as described under CEQA Guidelines section 15130. The DSEIR should discuss the Project's cumulative impacts to natural resources and determine if that contribution would result in a significant impact. The DSEIR should include a list of present, past, and probable future projects producing related impacts to biological resources or shall include a summary of the projections contained in an adopted local, regional, or statewide plan, that consider conditions contributing to a cumulative effect. The cumulative analysis shall include impact analysis of vegetation and habitat reductions within the area and their potential cumulative effects. Please include all potential direct and indirect Project-related impacts to riparian areas, wetlands, wildlife corridors or wildlife movement areas, aquatic habitats, sensitive species and/or special-status species, open space, and adjacent natural habitats in the cumulative effects analysis.

CDFW supports Project activities that help reduce GHG emissions to reduce climate change, especially if the Project activities avoid or minimize impacts to sensitive

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biological resources and effectively conserve wetlands, riparian forests, oak woodlands, streams, and other sensitive habitats.

Mitigation Measures for Project Impacts to Biological Resources

The DSEIR should include appropriate and adequate avoidance, minimization, and/or mitigation measures for all direct, indirect, and cumulative impacts that are expected to occur as a result of the construction and long-term operation and maintenance of the Project. CDFW also recommends the environmental documentation provide scientifically supported discussion regarding adequate avoidance, minimization, and/or mitigation measures to address the Project's significant impacts upon fish and wildlife and their habitat. For individual projects, mitigation must be roughly proportional to the level of impacts, including cumulative impacts, in accordance with the provisions of CEQA (Guidelines § § 15126.4(a)(4)(B), 15064, 15065, and 16355). In order for mitigation measures to be effective, they must be specific, enforceable, and feasible actions that will improve environmental conditions. When proposing measures to avoid, minimize, or mitigate impacts, CDFW recommends consideration of the following:

1. *Fully Protected Species*: Several Fully Protected Species (Fish & G. Code § 3511 and 4700) have the potential to occur within or adjacent to the Project area, including, but not limited to: California black rail (*Laterallus jamaicensis coturniculus*), golden eagle (*Aquila chrysaetos*), white-tailed kite (*Elanus leucurus*), ringtail (*Genus Bassariscus*), and wolverine (*Gulo luscus*). Project activities described in the DSEIR should be designed to completely avoid any fully protected species that have the potential to be present within or adjacent to the Project area. Fully protected species may not be taken or possessed at any time and no licenses or permits may be issued for their take except as follows:
 - Take is necessary for scientific research,
 - Efforts to recover a fully protected, endangered, or threatened species, live capture and relocation of a bird species for the protection of livestock, or
 - They are a covered species whose conservation and management is provided for in a Natural Community Conservation Plan (Fish & G. Code 3511, 4700, 5050, and 5515).

Project proponents should consult with CDFW early in the project planning process.

CDFW also recommends the DSEIR fully analyze potential adverse impacts to fully protected species due to habitat modification, loss of foraging habitat, and/or interruption of migratory and breeding behaviors. CDFW recommends that Sacramento County include in the analysis how appropriate avoidance, minimization and mitigation measures will reduce indirect impacts to fully protected species.

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2. *Species of Special Concern*: Several Species of Special Concern (SSC) have the potential to occur within or adjacent to the Project area, including, but not limited to: western spadefoot (*Spea hammondi*), burrowing owl (*Athene cunicularia*), western pond turtle (*Emys marmorata*), and loggerhead shrike (*Lanius ludovicianus*). Project activities described in the DSEIR should be designed to avoid any SSC that have the potential to be present within or adjacent to the Project area. CDFW also recommends that the DSEIR fully analyze potential adverse impacts to SSC due to habitat modification, loss of foraging habitat, and/or interruption of migratory and breeding behaviors. CDFW recommends Sacramento County include in the analysis how appropriate avoidance, minimization and mitigation measures will reduce impacts to SSC.
3. *Sensitive Plant Communities*: CDFW considers sensitive plant communities to be imperiled habitats having both local and regional significance. Plant communities, alliances, and associations with a statewide ranking of S-1, S-2, S-3, and S-4 should be considered sensitive and declining at the local and regional level. These ranks can be obtained by querying the CNDDDB and are included in *The Manual of California Vegetation* (Sawyer 2009). The DSEIR should include measures to fully avoid and otherwise protect sensitive plant communities from Project-related direct and indirect impacts.
4. *Mitigation*: CDFW considers adverse Project-related impacts to sensitive species and habitats to be significant to both local and regional ecosystems, and the DSEIR should include mitigation measures for adverse Project-related impacts to these resources. Mitigation measures should emphasize avoidance and reduction of Project impacts. For unavoidable impacts, onsite habitat restoration, enhancement, or permanent protection should be evaluated and discussed in detail. If onsite mitigation is not feasible or would not be biologically viable and therefore not adequately mitigate the loss of biological functions and values, offsite mitigation through habitat creation and/or acquisition and preservation in perpetuity should be addressed.

The DSEIR should include measures to perpetually protect the targeted habitat values within mitigation areas from direct and indirect adverse impacts in order to meet mitigation objectives to offset Project-induced qualitative and quantitative losses of biological values. Specific issues that should be addressed include restrictions on access, proposed land dedications, long-term monitoring and management programs, control of illegal dumping, water pollution, increased human intrusion, etc.

The 2022 Final CAP identified Natural and Working Lands as a sustainability planning strategy which sequesters carbon dioxide from the atmosphere by focusing on habitat preservation, increasing urban forest and connected open space, and carbon farming. CDFW supports Project activities that provides carbon storage in natural and working lands to mitigate greenhouse gas emissions. CDFW recommends that carbon storage involves the usage of native trees and shrubs to restore the natural habitats of special-status species like riparian forests

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and oak woodlands. CDFW recognizes Sacramento County's concern about the increased risk of wildfires from the planting due to climate change, so CDFW recommends that native fire-resistant species be considered as part of the planting palette such as California buckeyes (*Aesculus californica*).

The 2022 Final CAP discussed preparation for increased drought and increased flooding resulting from climate change involving improving water quality, streamflow, flood management, and watershed stewardship in the Sacramento River and the Lower American River watersheds. CDFW recommends that some of the improvements be focused on improvement of fish habitats. Project activities that benefit fish species such as restoring degraded channels and floodplains to original form and function, creating/opening tidal channels, removing natural barriers to increase spawning habitat, and protecting and improving wetland-fed streams that maintain higher summer flows can also create new flood capacity and increase water retention.

Also discussed in the 2022 Final CAP was restoring and replanting concrete lined channels and bared disturbed areas (around streams) to act as flood protection, improve water quality, and prevent erosion/sedimentation to help deal with climate change effects. CDFW strongly supports these Project activities as they increase stream habitat resiliency as well as provide restored habitat for local native species.

The 2022 Final CAP mentioned replacement of outdated lighting with new LED lighting. CDFW recommends that, for human and wildlife benefit, permanent project lighting implement the following measures to reduce excessive lighting at night:

1. All new installations or replacements of previously existing light emitters or bulb types for permanent use have an output of 2,700 kelvin or less that results in the output of a warm white color spectrum;
2. All new installations or replacements of previously existing light emitters or bulb types be fitted with back-shielding;
3. The surface area of the light should be directed so that it does not project into adjacent natural lands and habitat areas;
4. All permanent lighting should be directed towards the ground and employ adjusted mast height and adjusted reach arm lengths designed for site specific conditions to reduce light pollution into adjacent natural lands and habitat areas;
5. Motion sensor-based lighting systems, programmable lighting systems that operate on timers, and/or systems that have the potential to be shut down or tuned down in light intensity during critical times of the year such as migratory bird season or amphibian mating periods should be used, especially in areas adjacent to natural lands and habitat areas;

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6. New lighting installations should be designed to include lights embedded in stairs, bollards, and other new features to produce light for visibility and safety at ground level and to minimize the amount of overhead light spillage.
5. *Habitat Revegetation/Restoration Plans*: Plans for restoration and revegetation should be prepared by persons with expertise in the regional ecosystems and native plant restoration techniques. Plans should identify the assumptions used to develop the proposed restoration strategy. Each plan should include, at a minimum: (a) the location of restoration sites and assessment of appropriate reference sites; (b) the plant species to be used, sources of local propagules, container sizes, and seeding rates; (c) a schematic depicting the mitigation area; (d) a local seed and cuttings and planting schedule; (e) a description of the irrigation methodology; (f) measures to control exotic vegetation on site; (g) specific success criteria; (h) a detailed monitoring program; (i) contingency measures should the success criteria not be met; and (j) identification of the party responsible for meeting the success criteria and providing for conservation of the mitigation site in perpetuity. Monitoring of restoration areas should extend across a sufficient time frame to ensure that the new habitat is established, self-sustaining, and capable of surviving drought.

CDFW recommends that local onsite propagules from the Project area and nearby vicinity be collected and used for restoration purposes. Onsite seed collection should be appropriately timed to ensure the viability of the seeds when planted. Onsite vegetation mapping at the alliance and/or association level should be used to develop appropriate restoration goals and local plant palettes. Reference areas should be identified to help guide restoration efforts. Specific restoration plans should be developed for various Project components as appropriate. Restoration objectives should include protecting special habitat elements or re-creating them in areas affected by the Project. Examples may include retention of woody material, logs, snags, rocks, and brush piles. Fish and Game Code sections 1002, 1002.5 and 1003 authorize CDFW to issue permits for the take or possession of plants and wildlife for scientific, educational, and propagation purposes. Please see our website for more information on Scientific Collecting Permits at www.wildlife.ca.gov/Licensing/Scientific-Collecting#53949678-regulations-.

Another area of restoration mitigation opportunity is invasive plant species management. Many rare, threatened, and endangered native plants are more susceptible to extinction caused by climate change due principally to small population sizes and limited suitable habitat types. While some animals have the ability to move when conditions become unfavorable, plants are immobile and thus cannot as easily adapt to a quickly changing environment. Climate change may alter plant life stages such as leaf emergence or flowering period which may hinder survival and reproduction. Some studies estimate that endemic plant species' ranges may shift up to 90 miles under intense climate change, but this shift may be a slow process relative to a rapidly changing climate. Furthermore,

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plants that are restricted to extremely specific habitats are especially at risk because while the climatic environment may shift, the soil and nutrient environment will not. Invasive plant species pose a threat to native plants because invasives tend to do well in the changing conditions that climate change is thought to promote, and those invasives may then out-compete rare plants for vital resources. Invasive species management should aim to conserve and manage large areas of protected habitat for plants, which may rely on dispersal and a variety of habitat gradients and varied microsites to cope with the changing environment. Efforts should focus on reducing the negative effects of non-native invasive plant species like preventing the introduction of these species into the natural habitats of the County, detecting and responding to introductions when they occur, and preventing the spread of invasive plant species that have become established.

6. *Nesting Birds*: Please note that it is the Project proponent's responsibility to comply with all applicable laws related to nesting birds and birds of prey. Migratory nongame native bird species are protected by international treaty under the federal Migratory Bird Treaty Act (MBTA) of 1918, as amended (16 U.S.C. 703 *et seq.*). CDFW implemented the MBTA by adopting the Fish and Game Code section 3513. Fish and Game Code sections 3503, 3503.5 and 3800 provide additional protection to nongame birds, birds of prey, their nests and eggs. Sections 3503, 3503.5, and 3513 of the Fish and Game Code afford protective measures as follows: section 3503 states that it is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by the Fish and Game Code or any regulation made pursuant thereto; section 3503.5 states that it is unlawful to take, possess, or destroy any birds in the orders Falconiformes or Strigiformes (birds-of-prey) or to take, possess, or destroy the nest or eggs of any such bird except as otherwise provided by the Fish and Game Code or any regulation adopted pursuant thereto; and section 3513 states that it is unlawful to take or possess any migratory nongame bird as designated in the MBTA or any part of such migratory nongame bird except as provided by rules and regulations adopted by the Secretary of the Interior under provisions of the MBTA.

Potential habitat for nesting birds and birds of prey is present within the Project area. The Project should disclose all potential activities that may incur a direct or indirect take to nongame nesting birds within the Project footprint and its vicinity. Appropriate avoidance, minimization, and/or mitigation measures to avoid take must be included in the DSEIR.

Particular focus should also be directed to Project activities involving renewable energy installations like solar panels, wind turbines, and concentrated solar power (mirrors). While these renewable energy infrastructures are valuable tools to reduce GHG emission, they also have the side effect of potentially resulting in long-term take of both avian and bat species even after construction is completed. CDFW recommends the DSEIR fully analyze potential solar panels collisions because, from the air, they appear similar to water bodies (lakes) and birds fly into it, especially waterfowl. Similarly, Sacramento County should analyze concentrated solar power

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which can burn birds if they fly in the direct path where the mirrors focus the sunlight onto the receiver. Furthermore, CDFW recommends the DSEIR fully analyze potential impacts from wind turbines which can strike birds if they fly past them, especially at night when visibility is reduced.

CDFW recommends the DSEIR include specific avoidance and minimization measures to ensure that impacts to nesting birds or their nests do not occur. Project-specific avoidance and minimization measures may include, but not be limited to: Project phasing and timing, monitoring of Project-related noise (where applicable), sound walls, and buffers, where appropriate. The DSEIR should also include specific avoidance and minimization measures that will be implemented should a nest be located within the Project site. In addition to larger, protocol level survey efforts (e.g., Swainson's hawk surveys) and scientific assessments, CDFW recommends a final preconstruction survey be required no more than three (3) days prior to vegetation clearing or ground disturbance activities, as instances of nesting could be missed if surveys are conducted earlier.

The County should consider avoiding the construction of these renewable energy infrastructures near suitable habitats for birds and not in their migratory routes. Large solar installations should be properly sited to avoid disrupting bird habitat, and to minimize the chances that birds collide with the solar panels and associated infrastructure, like transmission lines and substations. In addition, the County should consider installation of deterrence devices to reduce the likelihood of bird collisions like acoustics sounds of predators or the distress calls of each species to keep birds away, painting of turbine blades black to reduce motion smearing to make the blades more visible to the birds, turbine shutdown when birds are flying nearby, and plastic predators to scare birds away.

7. *Moving out of Harm's Way*: The Project is anticipated to result in the clearing of natural habitats that support native species. To avoid direct mortality, Sacramento County should state in the DSEIR a requirement for a qualified biologist with the proper handling permits, will be retained to be onsite prior to and during all ground- and habitat-disturbing activities. Furthermore, the DSEIR should describe that the qualified biologist with the proper permits may move out of harm's way special-status species or other wildlife of low or limited mobility that would otherwise be injured or killed from Project-related activities, as needed. The DSEIR should also describe qualified biologist qualifications and authorities to stop work to prevent direct mortality of special-status species. CDFW recommends fish and wildlife species be allowed to move out of harm's way on their own volition, if possible, and to assist their relocation as a last resort. It should be noted that the temporary relocation of onsite wildlife does not constitute effective mitigation for habitat loss.
8. *Translocation of Species*: CDFW generally does not support the use of relocation, salvage, and/or transplantation as the sole mitigation for impacts to rare, threatened, or endangered species as these efforts are generally experimental in nature and largely unsuccessful. Therefore, the DSEIR should describe additional mitigation measures utilizing habitat restoration, conservation, and/or preservation, in addition

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to avoidance and minimization measures, if it is determined that there may be impacts to rare, threatened, or endangered species.

The DSEIR should incorporate mitigation performance standards that would ensure that impacts are reduced to a less-than-significant level. Mitigation measures proposed in the DSEIR should be made a condition of approval of the Project. Please note that obtaining a permit from CDFW by itself with no other mitigation proposal may constitute mitigation deferral. CEQA Guidelines section 15126.4, subdivision (a)(1)(B) states that formulation of mitigation measures should not be deferred until some future time. To avoid deferring mitigation in this way, the DSEIR should describe avoidance, minimization and mitigation measures that would be implemented should the impact occur.

California Endangered Species Act

CDFW is responsible for ensuring appropriate conservation of fish and wildlife resources including threatened, endangered, and/or candidate plant and animal species, pursuant to CESA. CDFW recommends that a CESA Incidental Take Permit (ITP) be obtained if the Project has the potential to result in “take” (Fish & G. Code § 86 defines “take” as “hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill”) of State-listed CESA species, either through construction or over the life of the Project.

State-listed species with the potential to occur in the area include, but are not limited to: Antioch Dunes evening-primrose (*Oenothera deltoides* ssp. *howellii*), bald eagle (*Haliaeetus leucocephalus*), bank swallow (*Riparia riparia*), Boggs Lake hedge-hyssop (*Gratiola heterosepala*), California tiger salamander - central California DPS (*Ambystoma californiense* pop. 1), Crotch’s bumble bee (*Bombus crotchii*), delta smelt (*Hypomesus transpacificus*), giant garter snake (*Thamnophis gigas*), least Bell’s vireo (*Vireo bellii pusillus*), longfin smelt (*Spirinchus thaleichthys*), Mason’s lilaepsis (*Lilaepsis masonii*), Sacramento Orcutt grass (*Orcuttia viscida*), salt-marsh harvest mouse (*Reithrodontomys raviventris*), slender Orcutt grass (*Orcuttia tenuis*), soft salty bird’s-beak (*Chloropyron molle* ssp. *molle*), Swainson’s hawk (*Buteo swainsoni*), tricolored blackbird (*Agelaius tricolor*), and western yellow-billed cuckoo (*Coccyzus americanus occidentalis*).

The DSEIR should disclose the potential of the Project to take State-listed species and how the impacts will be avoided, minimized, and mitigated. Please note that mitigation measures that are adequate to reduce impacts to a less-than significant level to meet CEQA requirements may not be enough for the issuance of an ITP. To facilitate the issuance of an ITP, if applicable, CDFW recommends the DSEIR include measures to minimize and fully mitigate the impacts to any State-listed species the Project has potential to take. CDFW encourages early consultation with staff to determine appropriate measures to facilitate future permitting processes and to engage with the U.S. Fish and Wildlife Service and/or National Marine Fisheries Service to coordinate specific measures if both State and federally listed species may be present within the Project vicinity.

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Native Plant Protection Act

The Native Plant Protection Act (Fish & G. Code §1900 *et seq.*) prohibits the take or possession of State-listed rare and endangered plants, including any part or product thereof, unless authorized by CDFW or in certain limited circumstances. Take of State-listed rare and/or endangered plants due to Project activities may only be permitted through an ITP or other authorization issued by CDFW pursuant to California Code of Regulations, Title 14, section 786.9 subdivision (b).

Lake and Streambed Alteration Program

The DSEIR should generally identify all perennial, intermittent, and ephemeral rivers, streams, lakes, other hydrologically connected aquatic features, and any associated biological resources/habitats present within the entire Project footprint (including utilities, access and staging areas). The environmental document should analyze all potential temporary, permanent, direct, indirect and/or cumulative impacts to the above-mentioned features and associated biological resources/habitats that may occur because of the Project. If it is determined the Project will result in significant impacts to these resources the DSEIR shall propose appropriate avoidance, minimization and/or mitigation measures to reduce impacts to a less-than-significant level.

Section 1602 of the Fish and Game Code requires an entity to notify CDFW prior to commencing any activity that may do one or more of the following:

1. Substantially divert or obstruct the natural flow of any river, stream or lake;
2. Substantially change or use any material from the bed, channel or bank of any river, stream, or lake; or
3. Deposit debris, waste or other materials where it may pass into any river, stream or lake.

Please note that "any river, stream or lake" includes those that are episodic (i.e., those that are dry for periods of time) as well as those that are perennial (i.e., those that flow year-round). This includes ephemeral streams and watercourses with a subsurface flow. It may also apply to work undertaken within the flood plain of a body of water.

If upon review of an entity's notification, CDFW determines that the Project activities may substantially adversely affect an existing fish or wildlife resource, a Lake and Streambed Alteration (LSA) Agreement will be issued which will include reasonable measures necessary to protect the resource. CDFW's issuance of an LSA Agreement is a "project" subject to CEQA (see Pub. Resources Code 21065). To facilitate issuance of an LSA Agreement, if one is necessary, the DSEIR should fully identify the potential impacts to the lake, stream, or riparian resources, and provide adequate avoidance, mitigation, and monitoring and reporting commitments. Early consultation with CDFW is recommended, since modification of the Project may avoid or reduce impacts to fish and wildlife resources. All LSA Notification types must be submitted online through CDFW's Environmental Permit Information Management System (EPIMS). For more

2024 Sacramento County Action Plan

January 29, 2024

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information about EPIMS, please visit <https://wildlife.ca.gov/Conservation/Environmental-Review/EPIMS>. More information about LSA Notifications, paper forms and fees may be found at <https://www.wildlife.ca.gov/Conservation/Environmental-Review/LSA>.

Please note that other agencies may use specific methods and definitions to determine impacts to areas subject to their authorities. These methods and definitions often do not include all needed information for CDFW to determine the extent of fish and wildlife resources affected by activities subject to Notification under Fish and Game Code section 1602. Therefore, CDFW does not recommend relying solely on methods developed specifically for delineating areas subject to other agencies' jurisdiction (such as United States Army Corps of Engineers) when mapping lakes, streams, wetlands, floodplains, riparian areas, etc. in preparation for submitting a Notification of an LSA.

CDFW relies on the lead agency environmental document analysis when acting as a responsible agency issuing an LSA Agreement. CDFW recommends lead agencies coordinate with us as early as possible, since potential modification of the proposed Project may avoid or reduce impacts to fish and wildlife resources and expedite the Project approval process.

The following information will be required for the processing of an LSA Notification and CDFW recommends incorporating this information into any forthcoming CEQA document(s) to avoid subsequent documentation and Project delays:

1. Mapping and quantification of lakes, streams, and associated fish and wildlife habitat (e.g., riparian habitat, freshwater wetlands, etc.) that will be temporarily and/or permanently impacted by the Project, including impacts from access and staging areas. Please include an estimate of impact to each habitat type.
2. Discussion of specific avoidance, minimization, and mitigation measures to reduce Project impacts to fish and wildlife resources to a less-than-significant level. Please refer to section 15370 of the CEQA Guidelines.

Based on review of Project materials, aerial photography and observation of the site from public roadways, the Project site supports streams (American River, Cosumnes River, Mokelumne River, Sacramento River, San Joaquin River, Sacramento–San Joaquin River Delta, and their tributaries), lakes (Folsom Lake, Lake Natomas, Stone Lake, etc.), and their associated tributaries and riparian habitat. CDFW recommends the DSEIR fully identify the Project's potential impacts to the stream and/or its associated vegetation and wetlands.

ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database, which may be used to make subsequent or supplemental environmental determinations (Pub. Resources Code, § 21003, subd. (e)). Accordingly, please report any special-status species and natural communities detected during Project surveys to CNDDDB. The CNDDDB field survey form

2024 Sacramento County Action Plan

January 29, 2024

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can be found at the following link: <https://www.wildlife.ca.gov/Data/CNDDDB/Submitting-Data>. The completed form can be submitted online or mailed electronically to CNDDDB at the following email address: CNDDDB@wildlife.ca.gov.

FILING FEES

The Project, as proposed, would have an effect on fish and wildlife, and assessment of filing fees is necessary. Fees are payable upon filing of the Notice of Determination by Sacramento County and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required in order for the underlying project approval to be operative, vested, and final. (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code § 711.4; Pub. Resources Code, § 21089.)

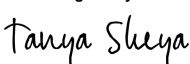
CONCLUSION

Pursuant to Public Resources Code sections 21092 and 21092.2, CDFW requests written notification of proposed actions and pending decisions regarding the Project. Written notifications shall be directed to: California Department of Fish and Wildlife North Central Region, 1701 Nimbus Road, Rancho Cordova, CA 95670 or emailed to R2CEQA@wildlife.ca.gov.

CDFW appreciates the opportunity to comment on the Notice of Preparation of the DSEIR for the 2024 Sacramento County Climate Action Plan and recommends that Sacramento County address CDFW's comments and concerns in the forthcoming DSEIR. CDFW personnel are available for consultation regarding biological resources and strategies to minimize impacts.

If you have any questions regarding the comments provided in this letter, or wish to schedule a meeting and/or site visit within CDFW Region 2 (Sacramento County east of Interstate 5), please contact Harvey Tran, Senior Environmental Scientist at (916) 358-4035 or harvey.tran@wildlife.ca.gov. Within CDFW Region 3 (Sacramento County west of Interstate 5), please contact Andrea Boertien, Environmental Scientist at (707) 317-0388 or Andrea.Boertien@wildlife.ca.gov.

Sincerely,

DocuSigned by:

1ABC45303752499...

Tanya Sheya
Environmental Program Manager

2024 Sacramento County Action Plan

January 29, 2024

Page **16** of **16**

ec: Dylan Wood, Senior Environmental Scientist (Supervisory)
Harvey Tran, Senior Environmental Scientist (Specialist)
Michelle Battaglia, Senior Environmental Scientist (Supervisory)
Andrea Boertien, Environmental Scientist
California Department of Fish and Wildlife

Office of Planning and Research, State Clearinghouse, Sacramento

REFERENCES

Sawyer, J. O., T. Keeler-Wolf, and J. M. Evens. 2009. A Manual of California Vegetation, 2nd ed. California Native Plant Society Press, Sacramento, California.
<http://vegetation.cnps.org/>



Chatten-Brown Law Group, APC
Kathryn Pettit | Associate
325 W. Washington Street, Suite 2193
San Diego, CA 92103
kmp@chattenbrownlawgroup.com
Phone: (619) 393-1440

January 31, 2024

Todd Smith, Planning Director
Planning and Environmental Review
827 7th St., Room 225
Sacramento, CA 95814
smithtodd@saccounty.gov

**Re: Scoping Comments on the Sacramento County Climate Action Plan
Subsequent Environmental Impact Report**

Dear Mr. Smith:

Please accept the following comments on behalf of the Sacramento Group and the Mother Lode Chapter of the Sierra Club (“Sierra Club”) regarding the preparation of a Subsequent Environmental Impact Report (“SEIR”) for the Sacramento County Climate Action Plan (“CAP”). The Sierra Club has provided comments on prior versions of the Sacramento County CAP and remains dedicated to ensuring effective strategies for greenhouse gas (“GHG”) reductions and adapting to climate change. Sierra Club appreciates the County undertaking an SEIR and providing the opportunity to provide scoping comments.

In addition to the impacts, mitigation strategies, and alternatives described in the County’s Notice, the Sierra Club requests that the following be studied in the SEIR.

I. Land Use Impacts Must Be Studied

Land use must be added as a focus area of the SEIR. Land use often “drives GHG emissions”. (*See Golden Door Properties, LLC v. County of San Diego* (2020) 50 Cal.App.5th 467, 549.). Several land use impacts should be examined in the SEIR. For example, the SEIR must study whether additional transportation corridors and other proposed land use changes will be consistent with the Sacramento Area Council of Government (“SACOG”) Blueprint. The CAP must also include land use policies to encourage smart growth and reduce GHG emissions related to transportation, the largest source of GHG emissions in the County.

Additionally, the SEIR must evaluate and address the GHG emissions that will be created from urban boundary adjustments, including the cumulative impacts of recently approved and pending urban boundary adjustment projects. Previously, the Sierra Club raised concerns that previous inventories and forecasts were inaccurate because they did not account for GHGs from pending

or approved projects that were not included in SACOG's growth projections. The following plans and projects must be included in the study:

- Cordova Hills Specific Plan;
- Jackson Township Specific Plan;
- Newbridge Specific Plan;
- The Northwest Special Planning Area;
- Specific Plans and projects in Unincorporated Sacramento County, including the West Jackson Specific Plan; and
- Any additional projects beyond the UPA and USB including, Jackson West, Grand Park, and Upper West Side, and the recently submitted Conceptual Annexation Proposal for the City of Folsom.

The SEIR must also evaluate any impacts to the County's agricultural lands, forest lands, and lands with high carbon sequestration. Preservation of these areas is essential – not only to meeting reduction targets and neutrality goals, but also to the health of the community and environment.

II. CAP Components and Measures To Be Studied

The SEIR must examine whether the CAP's baseline year serves as an accurate representation of local emissions levels. The Sierra Club has raised concerns in previous comments and at scoping meetings that 2021 may be under representative of the area's emissions, given that COVID was still greatly impacting the County at this time. The baseline for the CAP must rely on the best available data to provide an accurate and updated representation of the County's emissions levels and sources. Therefore, if the CAP intends to rely on 2021 as a baseline, we request that the SEIR provide substantial evidence that this year is in fact the most accurate data.

Additionally, the SEIR should study carbon neutrality requirements for new greenfield development. The CAP had previously included a carbon neutrality requirement, but this was taken out. As a preliminary matter, Sierra Club advocates for smart growth, and opposes greenfield sprawl that results in significant GHG impacts. However, if the County is to consider a new greenfield development, it must require carbon neutrality to preclude obstruction of the County's GHG reduction targets. Further, any carbon neutrality requirement must include adequate safeguards to ensure the CAP will not facilitate urban sprawl and that new greenfield development will actually achieve carbon neutrality. Out-of-County carbon offsets must not be relied on, given the prolific evidence demonstrating they do not produce the promised GHG reductions, as discussed further below in Section III.¹

¹ See Patrick Greenfield, "Cookstove carbon offsets overstate climate benefit by 1000%, study finds," *The Guardian* (January 23, 2024) (<https://www.theguardian.com/environment/2024/jan/23/clean-cookstove-carbon-offsets->

We request that the SEIR examine the CAP's unquantified measures and whether quantification is achievable for those measures. Sierra Club recognizes that not every measure can be quantified, however, more quantification allows more robust tracking of the CAP's progress in reducing emissions. Previously, some CAP components were unquantified due to lack of data. The SEIR provides an opportunity to examine new information² and support quantification where the requisite data exists.

In addition, the SEIR must evaluate the enforceability of both quantified and unquantified CAP measures. Too much reliance on voluntary measures, flexible requirements, and soft actions could frustrate the goals of the CAP. The feasibility and effectiveness of the CAP's implementation timelines must also be evaluated. Previous versions of and addendums to the CAP utilized different implementation dates and timelines. Sierra Club supports urgent and achievable action to address climate change.

The SEIR must also evaluate the CAP's monitoring and updating procedures, and whether they serve as an adequate safeguard for identifying and resolving inefficiencies and problems. The CAP must require regular assessments of its effectiveness, including the GHG reductions achieved by each measure.

Finally, the SEIR must evaluate the CAP's consistency with State regulations and requirements. Sierra Club appreciates the County's plans to update the CAP to comply with recent changes, including the State's 2022 Climate Scoping Plan.

III. Mitigation Measures That Must Be Studied

The SEIR must evaluate the feasibility of a local GHG mitigation program. Sierra Club has consistently supported the creation of a local GHG mitigation program over out-of-jurisdiction solutions or reliance on state programs. A local mitigation program is feasible and would help the County achieve its reduction targets, concentrate benefits of mitigation programs within the County, and allow the County to better enforce mitigation programs. Therefore, a local GHG mitigation program must be studied. The analysis should include sufficient details, including protocols and standards, for a local program that will ensure reductions are real, quantifiable, verified, additional, and permanent.

[overstate-climate-benefit-by-1000-percent](#)); Nina Lakhani, "Revealed: top carbon offset projects may not cut planet-heating emissions," *The Guardian* (Sept. 9, 2023) (<https://www.theguardian.com/environment/2023/sep/19/do-carbon-credit-reduce-emissions-greenhouse-gases>).

² New information might include updated cost-effectiveness studies from the California Statewide Reach Codes Program and recommendations from the County's Climate Emergency Task Force. The Nonresidential New Construction Reach Code Cost-Effectiveness Study was released in November 2022. See Southern California Edison Co., "2022 Code: Nonresidential New Construction Reach Code Cost-Effectiveness Study." (https://localenergycodes.com/download/1266/file_path/fieldList/2022%20Nonres%20New%20Construction%20Cost-ef%20Report.pdf.)

Generally, Sierra Club is concerned with the efficacy of out of County offset programs and their ability to deliver promised reductions. For instance, a 2019 study by the Harvard Kennedy School identified issues with California’s compliance offset market, including that one protocol produced more than 115.6 million illegitimate offsets.³ Moreover, a paper by the University of California San Diego and Scripps Institute of Oceanography identified problems with out-of-jurisdiction carbon offsets, including that it is nearly impossible to tell if a project is additional.⁴ If the CAP plans to allow out-of-County offsets, the SEIR must analyze the impact of this non-local mitigation on the County’s ability to meet its targets and enforce GHG mitigation standards.

While previous iterations of the CAP evolved to prioritize local offset projects over out-of-jurisdiction options, this preference is illusory if there are no local mitigation opportunities available. The CAP must preclude use of out-of-County carbon offset programs, and should instead establish local projects which can be verified and provide co-benefits for the community.

IV. Smart Growth Alternatives Must Be Studied

The SEIR must study a smart growth alternative that aligns with the regional transportation plan. Including a smart growth alternative in the SEIR is wholly appropriate and can provide meaningful strategies for GHG reduction. In *Golden Door Properties, LLC v. County of San Diego* (2020) 50 Cal.App.5th 467, the Court of Appeal found that a smart growth alternative was consistent with achieving the goals of the San Diego County CAP. (*Id.* at p. 107.) The court rejected the County’s arguments that the CAP was “not a land use plan, but an emissions reduction plan” instead finding that “land use often drives GHG emission levels.” (*Id.* at 549.) For example, “the amount of GHG emissions from agricultural land and open space will be vastly different if that same land contains 14,000 homes, roads, and infrastructure.” (*Ibid.*) Therefore, a smart growth land use alternative was reasonably related to the CAP’s objective of GHG emission reductions. (*Ibid.*)

Similarly, land use and future development will influence GHG emissions in Sacramento County. A smart growth alternative would be consistent with the goals of the CAP and must be evaluated in the SEIR.

³ Jack B. Smith, “California Compliance Offsets: Problematic Protocols and Buyer Behavior,” Harvard Kennedy School, Mossavar-Rahmani Center for Business and Government (March 2019) (available online at https://www.hks.harvard.edu/sites/default/files/centers/mrcbg/files/120_final.pdf).

⁴ Sara Wanous, “Carbon Offsets in San Diego County: An Analysis of Carbon Offset Policy Effectiveness, Best Practices, and Local Viability in the San Diego County Region,” *UC San Diego: Climate Science and Policy* (2019) (available online at <https://escholarship.org/uc/item/2t48k6m7>).

Smith
January 31, 2024
Page 5

V. Conclusion

Thank you for considering these comments. Sierra Club looks forward to the completion of the SEIR, an important next step in developing a successful CAP.

Sincerely,

A handwritten signature in blue ink that reads "Kathryn Pettit". The signature is written in a cursive, flowing style.

Kathryn Pettit
Josh Chatten-Brown
Madelyn Sickle

From: susanherre@gmail.com
To: [Smith, Todd](#); [PER-CEQA](#)
Cc: [Supervisor Serna](#); [Pat Hume](#); [Rich Desmond](#); [Kennedy, Supervisor](#); [Frost, Supervisor](#); [Clerk of the Board Public Email](#); rpropper47@icloud.com; [ECOS Sacramento](#)
Subject: ECOS Comment Letter re Notice of Preparation for SEIR for SacCounty CAP
Date: Wednesday, January 31, 2024 3:32:14 PM
Attachments: [240131 ECOS letter to Todd Smith re SacCountyCAP NOP.pdf](#)
Importance: High

EXTERNAL EMAIL: If unknown sender, **do not** click links/attachments.
If you have concerns about this email, please report it via the Phish Alert button.

Dear Todd,

ECOS offers two comments on the subject document, summarized below. Please see the **attached letter** for supporting information.

1. The Climate Action Plan (CAP) and SEIR should be complete, that is, they should show how carbon neutrality will be achieved in the County in whatever year the County believes is realistic.
2. We know that land use and transportation are the keys to GHG emissions reduction. Therefore, the CAP and SEIR should include alternatives or scenarios showing three levels and locations of development – mostly greenfield, some greenfield/some infill, and mostly infill – similar the SACOG’s three Pathways for our region that were discussed by the jurisdictions last summer.

Thank you for your consideration of these comments.

Sincerely yours,

Susan



SUSAN HERRE AIA AICP
President of the Board of Directors
Environmental Council of Sacramento
<https://www.ecosacramento.net/>
202-747-4087

From: Laurie Heller, 1401 Perkins Way, Sacramento CA 95818

To: Mr. Todd Smith, Director, Sacramento County Planning and Environmental Review

Re: SACRAMENTO COUNTY CAP REVISE AND SEIR - COMMENTS

Via Email Only: CEQA@saccounty.gov.

There are some things only government can do to make the structural changes necessary to address our climate crisis. The Biden administration provided a range of 'carrots' (grants) to tempt state and local governments to do the right thing. In recent decades, the State of California made numerous policy changes (AB 32, SB 375, et al) to compel local governments to take the necessary steps. My favorite recent example is ending food waste in our landfills. Adoption by individuals and businesses is made possible through State policy and County implementation, including education and support.

Likewise, reducing VMT and GHGs by reducing automobile traffic could be achieved through joint government action. Change is more attractive when local government has federal and state dollars to spend. But reducing VMT can only be adopted by the public if there is a change in local land use policy.

Growing up on the East Coast we relied on public transit. Even in the suburbs, I could easily walk from home/school/work to bus stops, or park-and-ride at an Amtrak station. Fifty years ago, we could travel long or short distances on public transit at affordable prices. In recent years too I traveled for work and pleasure through the Middle-States and New England on an expanded public-private network of trains and buses. I used dedicated express trains on the Boston-NYC-DC corridor, visited family on the Hudson River line, and the recently opened line through the Berkshires and Vermont. I did the same in Europe, relying on express buses (now enhanced by Uber and Lyft) between London and Oxford, high-speed rail from Sevilla to Madrid, and local trains from St. Petersburg to the Baltic beaches. Perhaps you have done this too.

But that could never happen here. In the Sacramento Valley we do not build communities to facilitate public transit, so the market forces which ensure success cannot work. I place the blame squarely on the County's 19th century conception of land-use.

Sacramento County has regulatory authority, but its land-use practices frequently conflict with the 'Smart Growth' principles in its General Plan. Expanding the UPI, as Sacramento County has consistently done, makes long-term infrastructure planning difficult, and undermines the County's own goals, policies, and principles. The potential to scatter development anywhere in the County a project may be proposed makes it especially difficult to master-plan transportation, or build walkable neighborhoods near work, schools, hospitals, et al.

Leap-frog development also draws dollars away from the more challenging infill and redevelopment projects. Yet the practice has been ubiquitous in Sacramento County – despite the 'carrots' Federal, State, and regional agencies offer for infill and transit-oriented development. Landowners know to wait patiently until Supervisors vote to breach the UPI in favor of their project. But allowing growth in areas dominated by open space and agriculture is done at a cost to the needs of vulnerable communities within their districts – and Supervisors' expressed claims of 'concern.'

The purpose of the CAP is to reduce GHG emissions in the unincorporated county, of which 40% are from VMT. But reducing VMT will not be accomplished by electric vehicles alone. PUBLIC TRANSIT should be a

feasible alternative. That requires a shift in Sacramento County's land use policies, and an honest FOCUS ON CONTIGUOUS URBAN DEVELOPMENT AND TRANSIT-ORIENTED INFILL. The County must show ALTERNATIVES in the SEIR that step up to the challenge – and make the essential course corrections on our current path to climate hell.

From: [Newton, Julie](#)
To: [Smith, Todd](#)
Subject: FW: EIR Comments
Date: Thursday, January 11, 2024 9:55:47 AM

-----Original Message-----

From: PER-CEQA <CEQA@saccounty.gov>
Sent: Wednesday, January 10, 2024 7:42 AM
To: Newton, Julie <newtonj@saccounty.gov>
Cc: Little, Alison <littlea@saccounty.gov>; Messerschmitt, Kevin <messerschmittk@saccounty.gov>
Subject: FW: EIR Comments

Andrea Guerra, Senior Office Assistant
Planning and Environmental Review
827 7th Street, Room 225, Sacramento, CA 95814 | (916) 874-2862 (direct) www.planning.saccounty.gov

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-----Original Message-----

From: Karen Jacques <threegables1819@gmail.com>
Sent: Tuesday, January 9, 2024 9:33 PM
To: PER-CEQA <CEQA@saccounty.gov>
Subject: EIR Comments

EXTERNAL EMAIL: If unknown sender, do not click links/attachments.
If you have concerns about this email, please report it via the Phish Alert button.

I am a resident of Sacramento County's District 1 and I am extremely concerned about the worsening climate crisis. I want to see the County do everything possible to address it. I am relieved to see the County begin its' long awaited the EIR process. I am writing to say that the Draft EIR must include a "smart growth" alternative and that "smart growth" alternative must be the preferred alternative. I believe that developing and adopting a 'smart growth' alternative is the single most effective thing cities and counties can do to reduce their green house gas emissions.

Vehicle emissions are the greatest source of green house gases in California. It is imperative that Sacramento County do everything possible to reduce vehicle miles traveled (VMT) and meet or, preferably, exceed state and regional (SACOG) VMT goals. The only way the County can do this is to stop its long history of relentless sprawl, establish a firm urban limit line that is adhered to and that protects both existing agricultural lands and existing wild lands and the wild species that inhabit them. What's needed is the creation and adoption of a 'smart growth' EIR alternative that prioritizes infill and mixed use. It needs to have the kind of density that encourages and supports mass transit. It also needs to be conducive to walking and biking with shaded streets, bicycle lanes, intersections that pedestrians can safely cross and shops located within easy walking distance of residences. It also needs a mixture of residence types, not just single family homes. It must include housing affordable to lower income residents. It is imperative that Sacramento County become a place where a person doesn't need to own a car to live comfortably and where households can share one car instead of having two or three.

It has been a long time since the County completed its last County wide EIR and there has already been far too much sprawl (including projects the County approved, but that aren't built yet). This EIR must be the EIR that ends sprawl and changes how the county develops. Time is of the essence. Please treat this EIR and the County's long awaited Climate Action Plan as priorities.

Thank-you for this opportunity to comment.

Karen Jacques, District 1

From: [Newton, Julie](#)
To: [Smith, Todd](#)
Subject: FW: Improving the Sacramento County CAP
Date: Tuesday, January 16, 2024 8:05:25 AM


From: PER-CEQA <CEQA@saccounty.gov>
Sent: Tuesday, January 16, 2024 7:17 AM
To: Newton, Julie <newtonj@saccounty.gov>; Messerschmitt, Kevin <messerschmittk@saccounty.gov>; Little, Alison <littlea@saccounty.gov>
Subject: FW: Improving the Sacramento County CAP

CAP comments

Andrea Guerra, Senior Office Assistant
Planning and Environmental Review
827 7th Street, Room 225, Sacramento, CA 95814 | (916) 874-2862 (direct)
www.planning.saccounty.gov



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From: Kitty Williamson <kitty_williamson@yahoo.com>
Sent: Monday, January 15, 2024 4:40 PM
To: PER-CEQA <ceqa@saccounty.gov>
Subject: Improving the Sacramento County CAP

EXTERNAL EMAIL: If unknown sender, **do not** click links/attachments.
If you have concerns about this email, please report it via the Phish Alert button.

Thank you for continuing to revise and improve the Sacramento County Climate Action Plan (CAP). I'm writing to give you my input as a Sacramento County resident.

At this point in the CAP process, I urge you to include a *smart growth* alternative in the EIR, since infill development will reduce vehicle miles traveled (VMT) and greenhouse gasses. Vehicle exhaust is the largest source of greenhouse gasses in Sacramento County, so methods to reduce vehicle exhaust are needed. New housing should be built as infill, not outside the adopted growth boundary.

There is much support for infill projects at the State, SACOG, and the County. Let's prioritize infill as an effective way to reduce VMT and greenhouse gasses. Where possible, infill should be in locations where residents can avoid the use of private cars by using

transit, bikes, and walking. This is an important way to support the State's climate and air quality goals.

Thank you.

Katherine Williamson
4805 Olive Oak Way
Carmichael, CA 95608

From: [Newton, Julie](#)
To: [Smith, Todd](#)
Subject: FW: County draft CAP--EIR
Date: Tuesday, January 16, 2024 3:56:12 PM


From: PER-CEQA <CEQA@saccounty.gov>
Sent: Tuesday, January 16, 2024 3:51 PM
To: Little, Alison <littlea@saccounty.gov>; Messerschmitt, Kevin <messerschmittk@saccounty.gov>; Newton, Julie <newtonj@saccounty.gov>
Subject: FW: County draft CAP--EIR

Andrea Guerra, Senior Office Assistant

Planning and Environmental Review
827 7th Street, Room 225, Sacramento, CA 95814 | (916) 874-2862 (direct)
www.planning.saccounty.gov



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From: Laura Drath <lfdrath@gmail.com>
Sent: Tuesday, January 16, 2024 3:35 PM
To: PER-CEQA <CEQA@saccounty.gov>
Subject: Re: County draft CAP--EIR

EXTERNAL EMAIL: If unknown sender, **do not** click links/attachments.
If you have concerns about this email, please report it via the Phish Alert button.

Good afternoon--I am writing to urge that you include a Smart Growth alternative in the Environmental Impact Report for the County's proposed Climate Action Plan. The State, SACOG, and the County itself have all identified an emphasis on infill in planning as a crucial strategy in reducing VMT and the emission of greenhouse gases. Given this, it makes no sense that the County should allow for the planning of sprawl projects outside its adopted growth boundary. Auto traffic is the largest source of greenhouse gas emissions in our county, and it is imperative that we create a future that is LESS reliant--not more--on vehicular transportation. Please include a Smart Growth alternative in your plans. Thank you for your efforts--

Laura Drath
Citrus Heights 95610

From: [Newton, Julie](#)
To: [Smith, Todd](#)
Subject: FW: Smart Growth
Date: Thursday, January 18, 2024 8:19:06 AM


From: PER-CEQA <CEQA@saccounty.gov>
Sent: Thursday, January 18, 2024 8:18 AM
To: Newton, Julie <newtonj@saccounty.gov>; Messerschmitt, Kevin <messerschmittk@saccounty.gov>; Little, Alison <littlea@saccounty.gov>
Subject: FW: Smart Growth

Andrea Guerra, Senior Office Assistant

Planning and Environmental Review
827 7th Street, Room 225, Sacramento, CA 95814 | (916) 874-2862 (direct)
www.planning.saccounty.gov



Planning and Environmental Review has several customer service options available and appointments can be made for most services. Please see our website at planning.saccounty.gov for the most current information on how to obtain services including office and public counter hours.

 Please consider the environment before printing this email

From: Margie Tomenko <margietomenko@comcast.net>
Sent: Wednesday, January 17, 2024 9:47 PM
To: PER-CEQA <CEQA@saccounty.gov>
Subject: Smart Growth

EXTERNAL EMAIL: If unknown sender, **do not** click links/attachments.
If you have concerns about this email, please report it via the Phish Alert button.

Sacramento County,

While the CAP has many concerns and issues, most important is to include some Smart Growth with the revised CAP.

Please provide Smart Growth alternatives in the EIR. This is very important. The State said that infill and VMT reductions are a must to meet CA's climate goals. More infill has the greatest potential to reduce emissions.

There is much support for this. The County's own general plan AND Phase 1 Strategy CAP, SACOG's

regional sustainable communities strategy. With so much support, why are the huge sprawl projects still planned outside the adopted growth boundary???

Please include infill and VMT as Smart Growth alternatives in the EIR.

Thank you.

-Margie Tomenko

Sent from my happy little iPad

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NATIVE AMERICAN HERITAGE COMMISSION

December 19, 2023

RECEIVED

DEC 22 2023

Todd Smith
Sacramento County
827 7th Street, Rm. 225
Sacramento, CA 95814

County of Sacramento
Department of Community Development
Planning and Environmental Review Division

Re: 2023120386, Sacramento County Climate Action Plan Project, Sacramento County

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Reid Milanovich
Cahuilla

COMMISSIONER
Vacant

EXECUTIVE SECRETARY
**Raymond C.
Hitchcock**
Miwok, Nisenan

NAHC HEADQUARTERS
1550 Harbor Boulevard
Suite 100
West Sacramento,
California 95691
(916) 373-3710
nahc@nahc.ca.gov
NAHC.ca.gov

Dear Mr. Smith:

The Native American Heritage Commission (NAHC) has received the Notice of Preparation (NOP), Draft Environmental Impact Report (DEIR) or Early Consultation for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code §21000 et seq.), specifically Public Resources Code §21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource, is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, §15064.5 (b) (CEQA Guidelines §15064.5 (b)). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) shall be prepared. (Pub. Resources Code §21080 (d); Cal. Code Regs., tit. 14, § 5064 subd.(a)(1) (CEQA Guidelines §15064 (a)(1)). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources within the area of potential effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code §21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. (Pub. Resources Code §21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code §21084.3 (a)). **AB 52 applies to any project for which a notice of preparation, a notice of negative declaration, or a mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements.** If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. §800 et seq.) may also apply.

The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments.

Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.

[AB 52](#)

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

- 1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project:** Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:

 - a. A brief description of the project.
 - b. The lead agency contact information.
 - c. Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code §21080.3.1 (d)).
 - d. A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code §21073).
- 2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report:** A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code §21080.3.1, subds. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or Environmental Impact Report. (Pub. Resources Code §21080.3.1(b)).

 - a. For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code §65352.4 (SB 18). (Pub. Resources Code §21080.3.1 (b)).
- 3. Mandatory Topics of Consultation If Requested by a Tribe:** The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:

 - a. Alternatives to the project.
 - b. Recommended mitigation measures.
 - c. Significant effects. (Pub. Resources Code §21080.3.2 (a)).
- 4. Discretionary Topics of Consultation:** The following topics are discretionary topics of consultation:

 - a. Type of environmental review necessary.
 - b. Significance of the tribal cultural resources.
 - c. Significance of the project's impacts on tribal cultural resources.
 - d. If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code §21080.3.2 (a)).
- 5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process:** With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code §6254 (r) and §6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code §21082.3 (c)(1)).
- 6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document:** If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:

 - a. Whether the proposed project has a significant impact on an identified tribal cultural resource.
 - b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code §21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code §21082.3 (b)).

- 7. Conclusion of Consultation:** Consultation with a tribe shall be considered concluded when either of the following occurs:
- a.** The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
 - b.** A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code §21080.3.2 (b)).
- 8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document:** Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code §21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code §21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code §21082.3 (a)).
- 9. Required Consideration of Feasible Mitigation:** If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code §21084.3 (b). (Pub. Resources Code §21082.3 (e)).
- 10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:**
- a.** Avoidance and preservation of the resources in place, including, but not limited to:
 - i.** Planning and construction to avoid the resources and protect the cultural and natural context.
 - ii.** Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
 - b.** Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
 - i.** Protecting the cultural character and integrity of the resource.
 - ii.** Protecting the traditional use of the resource.
 - iii.** Protecting the confidentiality of the resource.
 - c.** Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
 - d.** Protecting the resource. (Pub. Resource Code §21084.3 (b)).
 - e.** Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code §815.3 (c)).
 - f.** Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code §5097.991).
- 11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource:** An Environmental Impact Report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:
- a.** The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code §21080.3.1 and §21080.3.2 and concluded pursuant to Public Resources Code §21080.3.2.
 - b.** The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
 - c.** The lead agency provided notice of the project to the tribe in compliance with Public Resources Code §21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code §21082.3 (d)).

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf

SB 18

SB 18 applies to local governments and requires local governments to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code §65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf.

Some of SB 18's provisions include:

1. **Tribal Consultation:** If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code §65352.3 (a)(2)).
2. **No Statutory Time Limit on SB 18 Tribal Consultation.** There is no statutory time limit on SB 18 tribal consultation.
3. **Confidentiality:** Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code §65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code §5097.9 and §5097.993 that are within the city's or county's jurisdiction. (Gov. Code §65352.3 (b)).
4. **Conclusion of SB 18 Tribal Consultation:** Consultation should be concluded at the point in which:
 - a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
 - b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: <http://nahc.ca.gov/resources/forms/>.

NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center (https://ohp.parks.ca.gov/?page_id=30331) for an archaeological records search. The records search will determine:
 - a. If part or all of the APE has been previously surveyed for cultural resources.
 - b. If any known cultural resources have already been recorded on or adjacent to the APE.
 - c. If the probability is low, moderate, or high that cultural resources are located in the APE.
 - d. If a survey is required to determine whether previously unrecorded cultural resources are present.
2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
 - a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.
 - b. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.

3. Contact the NAHC for:
 - a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
 - b. A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.

4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.
 - a. Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, §15064.5(f) (CEQA Guidelines §15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
 - b. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
 - c. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code §7050.5, Public Resources Code §5097.98, and Cal. Code Regs., tit. 14, §15064.5, subdivisions (d) and (e) (CEQA Guidelines §15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

If you have any questions or need additional information, please contact me at my email address: Pricilla.Torres-Fuentes@nahc.ca.gov.

Sincerely,

Pricilla Torres-Fuentes

Pricilla Torres-Fuentes
Cultural Resources Analyst

cc: State Clearinghouse

From: [Chris Brown](#)
To: [PER. climateactionplan](#); [Smith, Todd](#)
Subject: Comments on the Scoping plan for the County CAP
Date: Wednesday, January 31, 2024 4:44:36 PM

EXTERNAL EMAIL: If unknown sender, **do not** click links/attachments.
If you have concerns about this email, please report it via the Phish Alert button.

Dear Sacramento County representatives,

Please include in the scope of the CAP analysis and plans:

- Analysis of how public-private partnerships can accelerate climate responses. There are many ways that private equity can be encouraged to invest in the kinds of changes in appliances/equipment and using renewable energy that are cost prohibitive as upfront investments by individuals and small businesses, but which could be paid off over time. The County would provide the "banking structure" under existing law in which private equity could be invested in such programs.
- Climate adaptation programs that include extensive use of community NGO partners and community based decision-making processes so as to improve the uptake of the resulting programs, and the alertness of the community as to responses to extreme weather events, and rising temperatures.
- By extension, all of the previous comments provided by the Sacramento Climate Coalition and its members in the 2021 through 2022 community input processes on previous drafts of the CAP.
- Guarantees that the CAP document will not be used to slow down programs or actions which could more rapidly reduce GHG emissions and the attendant impacts of climate change.

Sincerely yours,
Chris Brown
Sacramento Climate Coalition



SACRAMENTO COUNTY FARM BUREAU

PUTTING THE FOOD ON YOUR FORK SINCE 1917

Jan 30, 2024

Sacramento County Planning and Environmental Review

Todd Smith, Planning Director

827 7th St, Rm 225

Sacramento, CA 95814

smithtodd@saccounty.gov

RE: Sacramento County Climate Action Plan SEIR

Dear Mr. Smith,

The Sacramento County Farm Bureau is a grassroots membership organization focusing on preserving and protecting our agricultural economy and rural lifestyle since 1917. Four thousand acres of vital farmland are lost each year to urbanization. There is a great concern among farmers and ranchers, that not only is the practice of farming and ranching decreasing, but their rural way of life is being threatened. Area growers work hard to supply consumers with high quality products while battling such obstacles as increased production costs and water availability. As the earth's original conservationists, farmers and ranchers have a keen interest in preserving our precious land for future generations. Farmers are concerned with natural resources, animal health, water, and air quality, among other imperative topics. Farm Bureau's voluntary elected leaders and professional staff work hard for all Californians to ensure the rural economy's growth, to protect the family farm, and to maintain the treasured natural resources that are so important to this state's vitality and lifestyle.

The Sacramento County Farm Bureau has several concerns with the Sacramento County Climate Action Plan. The climate action plan has no data on the amount of carbon and other greenhouse gases (GHG) currently being captured or proposed to be captured which would provide beneficial offset to emissions. Without this information, it does not solve the problem at hand. This plan needs to be applied with science-based data and analysis as to what components contribute to GHG emissions and what components contribute to GHG sequestration to ultimately develop a holistic plan that can reach carbon neutrality through proper management and balance of the whole county.

Sacramento County needs to look beyond just cutting emissions and really at what solutions will capture GHGs. The county will find that farmers usually have a negative carbon footprint. Having farmers cut more GHG emissions will actually decrease their ability to manage these agricultural lands properly, therefore hindering GHG sequestration alongside the huge reduction in food availability and economic revenue for the communities in our county. Agriculture is the solution for helping to mitigate other areas that cannot capture carbon. Therefore, we need to increase our agriculture within the county to strengthen the county's long-term sustainability in human health, food availability, and its economy. Though conserved lands do capture carbon, it is not as much as working agricultural lands. All lands need some type of management to be efficient and conservation areas are no different. When these lands are fenced off to preserve and prevent outside influences and disruptions, these preserved lands decrease in diversity, productivity, and therefore GHG sequestration.



SACRAMENTO COUNTY FARM BUREAU

PUTTING THE FOOD ON YOUR FORK SINCE 1917

Farmers have always been innovative towards advancements in technology and conservation practices to preserve their land, improve yields, improve energy efficiencies, and minimize economic costs. Utilizing these practices and technology, they have been continuing to reduce the amount of GHGs that they emit, while maintaining the amount of GHGs that they capture on their agricultural lands. But there is a limit to how much more they can cut. Our commercial farmers have been continually striving to become more efficiently productive and sustainable for the longevity of their farming operations and lands. Unfortunately, the electrification of all agricultural equipment is not realistic or economical. First, the power grid is not able to handle the additional energy loads that are required. Second, the infrastructure is not in place for a majority of these agricultural areas. The limited nearby lines that are in place mainly for residents are constantly unreliable for power and safety. Third, electric batteries are also more harmful to our land. The required number and size of these batteries would add enormous amounts of weight to the tractors, therefore increasing soil compaction and damage to crops and land. More tillage and working of the land prior to planting will be required to try to minimize the damage but will ultimately, permanently destroy this prime farmland.

Limiting urban sprawl to its current boundaries will also limit GHG emissions from the need for importation of food and fiber products that the urban centers required but cannot produce from farther locations that result in additional GHG emissions. Having more agriculture lands in our county will make our county more productive, more economically stable, and maintain food security for our communities in the future.

Agriculture is the solution and Sacramento County needs to embrace and encourage that essential industry before it's too late. Continuing to ask agriculture to make GHG cuts is ridiculous. They've been making cuts. They've been continuing to strive for maximum efficiency. They've been the solution all along for sequestering GHGs. Having other areas cut GHG emissions to reduce their loads that they contribute while not able to sequester GHGs is a good idea. But to penalize agriculture when it is the only solution the county has to actually reach GHG neutrality for its communities is a detriment to the county. The true solution for climate adaptation changes is to preserve the importance of agricultural land and increase agricultural production in our county while minimizing or consolidating the outward growth of urban areas.

Sincerely,

Jerry Spencer
President



January 29, 2024

Mr. Todd Smith, Director
Sacramento County Planning and Environmental Review
827 7th Street,
Sacramento, CA 95814,

Via Email Only: CEQA@saccounty.gov.

RESPONSE TO SACRAMENTO COUNTY NOP

Dear Todd,

The Sacramento Electric Vehicle Association (SacEV) appreciates the opportunity to provide scoping recommendations for a revised draft of the County's Climate Action Plan (CAP) and Supplemental EIR (SEIR).

We strongly recommend that the county set an EV adoption target to deliver a substantial portion of the desired GHG reductions. Each transition from a gas-powered vehicle to an EV saves an estimated 4 tons of GHG annually. The DMV and CEC provide vehicle adoption metrics. These can be used to evaluate the CAP's actions for its impact on the adoption target and adjusted as needed. Over time, actions and expenses with limited influence on EV adoption can be replaced with more effective ones.

Seven years ago, in early 2017, the Sacramento Electric Vehicle Association was one of eight organizations that contributed to the "Sacramento Area Plug-In Electric Vehicle Collaborative's Electric Vehicle Readiness and Infrastructure Plan." Several CAP actions reference this plan and the need to update it, but no specific target date is provided. A near term delivery date needs to be set for an updated plan which reflects the changes in the vehicle market and associated infrastructure.

These recommendations, updated from our discussions in 2023, are submitted to assist the county in meeting its GHG reduction targets while enhancing cost-effective options in the CAP. **Simple steps can be taken by the county to encourage and motivate residents to make their next vehicle purchase a zero-emission vehicle. Each transition results in an annual savings of approximately 4 tons of GHG.** At little cost, these recommendations significantly increase GHG reductions.

The county's efforts can leverage and amplify industry, SMUD, state, and federal agency support



for EV adoption. With over 100,000 EVs purchased by residents in the Sacramento region¹, one in four new vehicles sold is currently an EV. The federal Inflation Reduction Act's incentive of up to \$4,000 for each used EV purchased has significantly expanded the used EV market.

While we have several recommendations, we wish to highlight some aspects:

- We applaud the county's proposal to use the CalGreen Building code Tier 2 for EV charging infrastructure, particularly for new construction. Approximately one-third of families in the county will not adopt EVs without readily accessible, affordable, safe, and secure EV charging. **The CalGreen code cycles mentioned should align with those that will go into effect on January 1, 2026.** The CalGreen Building Codes are especially important for apartment dwellers, as home charging is by far the most critical enabler of EV adoption. Additionally, enhancing EV infrastructure at the workplace supports employees who lack access to charging at home.
- The county should make every effort to inform families and its workforce about the advantages of adopting an EV for their next new or used vehicle purchase. With the right information and encouragement, **each family's decision to EV for their next vehicle can not only save them money but also help the county reach its GHG reduction goals.** Active inclusion of community organizations at all county events should occur to provide EV education and share firsthand accounts of EV ownership. Independent events that provide EV education should be supported and promoted.
- All building electrification projects and initiatives should include EV infrastructure to enable EV adoption by all residents.
- Incentives, such as parking and charging discounts, should be deployed to shift workforce commuting to clean transportation. These can be made to be revenue neutral to the county.

As always, our aim is to support the County's adoption of an effective, CEQA-compliant CAP.

Respectfully submitted on behalf of the Sacramento Electric Vehicle Association,

A handwritten signature in black ink that reads "Guy T. Hall".

Guy Hall, Sacramento Electric Vehicle Association Director

¹ SacEV defines the Sacramento region as the counties of Sacramento, Placer, El Dorado, Yolo, Nevada, Sutter, Amador, Yuba, San Joaquin. Sacramento County alone is approaching 43,000 EVs sold.

MEASURE GHG-04: INCREASE ENERGY EFFICIENCY AND ELECTRIFICATION OF EXISTING COMMERCIAL/NONRESIDENTIAL BUILDINGS AND FACILITIES

- Energy Efficiency and Electrification options should include EV charging infrastructure in every instance. EV charging infrastructure is especially important to achieving GHG reductions if technology to install all-electric water and space heating appliances is not available. Installing EV charging infrastructure can significantly reduce the CO2 footprint of commercial and MFH buildings when associated transportation is taken into account.
- The Target Indicator for electrification upgrades should include EV charging infrastructure such as 50 percent participation to provide at least 10 percent of spaces supporting a Low Level 2 or 20 percent of spaces supporting a Level 1.

MEASURE GHG-05: INCREASE ENERGY EFFICIENCY AND ELECTRIFICATION OF NEW COMMERCIAL/NONRESIDENTIAL BUILDINGS OR FACILITIES

- Energy Efficiency and Electrification options should include EV charging infrastructure in every instance. EV charging infrastructure is critical for residents in older communities without access to EV charging. Unavailability of home charging places substantial financial, convenience and security impediments for these families to adopt clean EVs. Workplaces provide the second most useful charging facilities as the parking dwell time of most workers frequently matches the needs for commute.
- The Target Indicator for electrification upgrades should include EV charging infrastructure matching the Tier 2 of the CalGreen Building codes for EV infrastructure in non-residential construction scheduled for January 1st, 2026

MEASURE GHG-10: ELECTRIC VEHICLE INFRASTRUCTURE PROGRAM

- The Sacramento Electric Vehicle Association was one of the eight entities that contributed to the “Sacramento Area Plug-In Electric Vehicle Collaborative’s Electric Vehicle Readiness and Infrastructure Plan” in early 2017. The plan proposed EV charging levels based on EV model availability at the time. With the recent substantial increases in EV model availability, and recognizing the Climate Emergency Act, this plan needs updating to support the County CAP goals to accelerate transition of community and commuter vehicles to EV by 2030.
- Support of underserved communities is a key aspect of GHG-19 for new construction (residential and workplace) and should be a top priority. The majority of apartments / condos and older homes will not be helped by GHG-19, additional support is necessary for underserved communities via a sufficient number of appropriately located workplace EV charging stations and neighborhood Fast Charging, aligned with user dwell times. Given the current number of Fast Chargers is over 260¹, the Target Indicators of 160 installed by 2025 and 400 installed by 2030 are far too low. Outside of workplace and home charging, Level 2 charging is no longer a strong contributor to EV adoption.
- Target Indicator: The number of chargers is not the end goal. Rather the goal is a transition of vehicles from fossil fuel to electric. As stated at the top of our message the County needs to have an EV adoption goal, which this measure supports. The County EV

¹ As of December 31, 2021, the countywide count is 1,813 (DCFC: 262, L2 1,464, L1: 87) This count appears to be for public charging stations and includes the City of Sacramento, SMUD, SACOG, SMAQMD, State DGS and others.

registration goal should exceed its portion by 50% of the state's 2030 goal². This would be 25% of all vehicles on the road to be electric by 2030. That is about 210,000 EVs on the road by 2030.

- When planning implementation of EV charging, the speed of charging, and time required to charge, should match the EV parking dwell time of the EV driver at that site, which may require a mix of EV charging stations with different charging speeds.
- The county should have goals for medium and heavy-duty vehicle charging / refueling as well. The county should conduct research and assess the state's Zero Emission Truck (ZET) goals, and how those goals will impact Sac County. Sacramento County can be a hub for ZET charging as the state capitol, with reasonable electric rates and a gateway to Reno/Tahoe/80 region.
- *Notes:*
 - [California hits ambitious goal for electric cars 2 years early](#) *In 2012, Brown signed an executive order setting a target of 1.5 million "zero emission vehicles," or ZEVs, sold in California by 2025. But by March 31, 2023 the total had already reached. , 21% of all new passenger vehicles sold in California from Jan. 1 to March 31 were electric, a total of 124,053 vehicles.*
 - *For Sacramento county, 2,955 ZEVs sold in Q1 2023 bringing total sales to 85,000.*

GHG-11: REDUCE EMISSIONS FROM NEW RESIDENTIAL AND OFFICE/BUSINESS PROFESSIONAL DEVELOPMENT VEHICLE MILES TRAVELED

- We applaud the efforts to reduce VMT, but VMT should not be the sole mechanism to reduce GHGs. Encouraging transition to clean EVs for those unable or unwilling to reduce VMT should be a high priority as EVs can be the largest contributor to GHG reductions.

MEASURE GHG-12: UPDATE TRANSPORTATION SYSTEM MANAGEMENT PLAN FOR NONRESIDENTIAL PROJECTS

- We applaud the efforts to reduce trips generated by new projects as part of the TSM plan, but we recommend that EVs be included as a key component in the TSM planning process.

MEASURE GHG-13: REVISE PARKING STANDARDS FOR NONRESIDENTIAL DEVELOPMENT

- We support the appropriate sizing of non-residential parking. For parking spaces included in new construction, appropriate EV charging infrastructure needs to be included in the parking standards revisions, as described in GHG-19.

MEASURE GHG-14: IMPROVE TRANSIT ACCESS

- Low power EV charging should be provided at all light rail stations to reduce GHG along with VMT and parking congestion elsewhere.

² California Air Resources Board passed landmark rules that prohibit the sale of all new gasoline-powered cars, SUVs, minivans and pickups in the state by 2035. They require that 35% of all new passenger vehicles offered for sale in California starting in 2026 to be zero-emission — basically electric, plug-in — ramping up to 68% by 2030 and 100% by 2035.

So far six other states have copied California's rules: New York, Virginia, Washington, Oregon, Massachusetts and Vermont. Others, including Colorado, Maryland, New Jersey, Rhode Island and Connecticut are considering similar rules. Sacramento county has 19.7% of new car sales being ZEV for Q1

- Consideration of locating mobility hubs in conjunction with transit and light rail.

MEASURE GHG-19: EV PARKING CODE

- **The EV Parking Code proposal in GHG-19 is one of the most impactful actions in the CAP.** It, along with GHG-10, opens EV adoption to residents in older homes, new apartments and condos, which comprise nearly a third of our community and are common in underserved communities.
- The phrase “EV charging capability” should be “EV Ready” as defined by the CalGreen code.
- The start date should coincide with the 2025 CalGreen code cycle update effective 1/1/2026.

MEASURE GHG-27: SHARED ELECTRIC VEHICLES AT AFFORDABLE HOUSING PROJECTS

- We support this measure, particularly for residents who don’t have their own vehicle. Experiencing electric vehicle driving is highly influential in the decision of a future vehicle purchase. The lower cost of EV ownership (new, used or shared) should be an option for all.

MEASURE GOV-EC-01: EMPLOYEE TRANSPORTATION PROGRAM

- We stress the importance of an education and incentives program for zero-emission commuters. We are glad to see the focus is on reduction of transportation related GHG.
- “Create two new staff positions”, not just “an assignment”, under the Chief of Fleets (or County Executive Office) to establish and operate a County Employee Transportation Demand Management Program” with their primary focus and goal to achieve a transition to zero emission employee commuting transportation. This is a low-cost investment that will yield high GHG reductions.
- The Transportation Demand Management Program should include acceleration of EV Adoption by employees. The target should show eight yearly steps towards a 2030 goal of 100%. Eight years ago, there were 19 EV models with only one having a range of over 200 miles and most had ranges under 100 miles. Today there are 87 models with most having over a 200-mile range or plug-in hybrids.
- We concur with providing incentives to employees who regularly walk, bike, or drive EVs. While a 10% participation goal (by 2030?) is mentioned, the 2030 goal assuming an average vehicle ownership is under 7 years³ should be 100% participation by 2030.
- Develop online videos about buying, driving, and maintaining EVs, that are hosted on the County’s website and linked to state
- The Target Indicator should reflect 100% participation of employees by 2030 with annual goals.

RE GOV-EC-02: TRANSIT SUBSIDY PROGRAM

- A similar EV adoption target should be set such as an alternative to use of gas vehicles. Incentives should match those in other subsidy programs.
- This measure should be integrated with GOV-EC-01.

³ According to IHS, the average length of ownership was a record 79.3 months, or nearly seven years.

MEASURE GOV-EC-05: PROVIDE CARPOOL-AT-WORK INCENTIVES

- Any carpool-at-work incentive should only apply if the shared transportation mode is zero emission.

MEASURE GOV-FL-01: FLEET CONVERSION PROGRAM

- The County fleet conversion program to zero emission vehicles should be at least as foresightful as the City of Sacramento program and should not be a laggard in contributing to reduced GHG emissions.
- Implement an Employee Workplace EV Charging Program wherever County employees park, aligned to employee dwell time or other low-cost approaches. This program should avoid the cost of monthly network fees whenever possible.
- Install EV charging stations at existing County parking facilities for visitor use, aligned to EV driver dwell time whenever possible.
- Replace every light duty vehicle that is a fossil fuel vehicle with a zero emission vehicle when the fossil fuel vehicle is retired, or sooner if possible.
- Establish an overall goal of transitioning the County fleet to zero emission vehicles with annual metrics to be established. The overall County Implementation and Target for new zero emission vehicle procurements should meet or exceed all State regulatory fleet requirements with the following overarching goals:
 - FY 2023-24 – 2024-25 25%
 - FY 2027-28 – 2025-29 50%
 - FY 2029-30 - 2030-34 75%
 - FY 2034-35 & thereafter 100%
- Exceptions to purchasing zero emission vehicles should be EXTREMELY LIMITED, and only if the replacement vehicle has significantly lower GHG emissions than the fossil fuel vehicle it replaces, or it uses renewable fuels or advanced technology hybrids with the lowest GHG emissions. Prior reasons that EVs are not suitable or are not convenient to charge, are no longer applicable for many duty cycles due to technology improvements.

MEASURE GOV-BE-03: EMPLOYEE GREEN BUILDING TRAINING

- 2025 CalGreen Building codes for charging infrastructure are significantly more complex than in prior years. Proper interpretation and implementation of the code will require training for employees in the County permitting office, as well as for architects and electrical engineers submitting permit applications, which should be provided by the County.

MEASURE GOV-BE-04: ELECTRIFY MUNICIPAL BUILDINGS

- The plan to be developed and implemented to electrify County-owned facilities should include actions to provide EV charging infrastructure for employees and visitors.

RE GOV-AR-01: AIRPORT FLEET REPLACEMENT

- This measure needs to be greatly expanded to go beyond shuttle buses⁴ and should include the transition to all electric vehicles, including all ramp and ground support vehicles,

⁴ Target Indicator: 15 zero-emission electric shuttle buses purchased by 2030

such as catering trucks, pushback tugs, belt loaders, baggage tractors and fueling trucks. They should purchase demonstration models by the end of 2022.

- As described above relating to equity, the county needs to provide charging stations for all airport employees. As with other staff, the county needs to focus on getting more airport workers into EVs. Most of these workers are private contractors and airline employees. Incentives, outreach, education, and marketing efforts, similar to those used with County employees will help.
- All county operated airports should be included: Sacramento International, Mather, Executive, and Franklin Field.
- The county should work with the vehicle rental agencies to create the infrastructure and program necessary for EV rental showcases at the airport.
- The Target Indicator should be far more aggressive and align with measure GOV-FL-01.

If you would like any additional information or would like us to discuss anything further with you, let us know. We look forward to working with the County to implement the Climate Action Plan.

Sincerely,

Sacramento Electric Vehicle Association
Guy Hall
Dwight MacCurdy
Cynthia Shalliti
Peter Macklin



January 30, 2024

Todd Smith, Planning Director
Sacramento County Planning and Environmental Review
827 7th Street, Room 225
Sacramento, CA 95814
smithtodd@sacounty.gov

Subject: Notice of Preparation of a Subsequent Environmental Impact Report for the Sacramento County Climate Action Plan

Dear Mr. Smith,

Thank you for routing the Notice of Preparation (NOP) for the Sacramento County Climate Action Plan to the Sacramento Metropolitan Air Quality Management District (Sac Metro Air District) for review. The Climate Action Plan (CAP) is intended to serve as mitigation for climate change impacts of the County's 2030 General Plan, as provided by Mitigation Measure (MM) CC-2 in the 2030 General Plan EIR (SCH# 2007082086). As the lead agency, the County will prepare a focused Subsequent Environmental Impact Report (SEIR) for the CAP that will tier from the certified 2030 General Plan EIR and will evaluate whether implementation of the CAP would result in new or substantially more severe significant impacts than the impacts disclosed in the 2030 General Plan EIR. Sac Metro Air District comments follow.

Mitigation Measures

Cool Pavement Measure – Cool pavements are an example of high-albedo building material that can reduce the urban heat island effect, reduce building energy consumption, save money and mitigate peak electricity demand. Sac Metro Air District and the California Air Pollution Control Officers Association (CAPCOA) are currently quantifying the greenhouse gas reductions associated with cool pavements and expect to be completed in the summer. The Sac Metro Air District is happy to share preliminary information if the County wishes to pursue and quantify this measure.

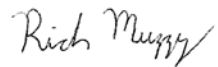
Transition Natural Gas in Existing Buildings – We encourage the county to continue pursuing the decarbonization of buildings, one of the most cost-effective and healthful measures that can be undertaken. However, we recommend a more comprehensive approach to electrifying existing buildings, including not only water and space heaters, but also other appliances, especially cooktops. As a model, consider the [City of Rancho Cordova's Climate Action and Adaptation plan](#) measure Energy-1.1, which implements a Utility User Tax increase of 3% on natural gas to incentivize electrification and generate funding for retrofit projects.

Refer to the Sac Metro Air District's [Guide to Air Quality Assessment in Sacramento County](#)¹ (CEQA Guide) when preparing the draft environmental impact report (DEIR).

When available, please send a copy of the SEIR to projectreview@airquality.org.

Please contact me if you have questions at (279) 207 – 1139 or rmuzzy@airquality.org. We look forward to reviewing the DEIR.

Sincerely,



Rich Muzzy
Air Quality Planner / Analyst

C: Paul Philley, AICP, Land Use and Transportation

¹ <http://www.airquality.org/Businesses/CEQA-Land-Use-Planning/CEQA-Guidance-Tools>