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

Transmitted via email to ClimateActionPlan.net on 3/24/2022

March 21, 2022

Subject: Sacramento Environmental Commission Comments on the Sacramento County Revised Final Climate Action Plan (February 2022)

Dear Mr. Smith,

The Sacramento Environmental Commission (SEC) submits the following comments on the February 2022 Climate Action Plan (CAP). The SEC met on March 21, 2022 to discuss and approve submitting these comments.

The SEC appreciates the effort to address and incorporate our September, 2021, comments on the Final Draft CAP. The improvements to the 2021 CAP include:

- Recognizing the County 2030 goal to achieve net zero carbon emissions,
- Acknowledging that the proposed CAP reduction measures will not achieve the 2030 zero carbon emission goal,
- Providing a general time frame to implement the proposed greenhouse gas (GHG) reduction measures,
- Reducing reliance on the carbon farming measure to offset existing and future emissions (Measure GHG-01),
- Re-enforcing the commitment to achieve the County 2030 net zero carbon emission goal by implementing actions through the County Sustainability Manager, the Climate Emergency Mobilization Task Force, and the Climate Emergency Response Plan (CERP).

The SEC reiterates our September, 2021, recommendations that the CAP be found adequate and complete. However, we continue to be concerned that the CAP be considered “Qualified” because of the lack of detail addressing how the measures will be implemented. Our concern is directed to the implementation of Measures GHG-01, GHG-06, GHG-07, GHG-11, and GHG-24 which will yield a cumulative GHG reduction of 397,563 MT CO₂e/year, or about 82% of the total planned GHG emission reductions in the CAP.

The SEC is supportive of many GHG reduction measures described in the CAP, however, without further information we are unsure if many measures can be implemented. The SEC suggests that priority be given to those measures that reduce GHG emissions, rather than offset existing emissions.

Two topics of concern warrant further consideration beyond the level addressed in the CAP:

- 1) Vehicle use is identified as the single largest emission sector in the County, yet the proposed reduction to this sector is minimal when compared to other GHG reduction measures. The County can substantially reduce future GHG emissions by encouraging infill development and requiring use of public transportation systems to serve new development in undeveloped areas. The reduction of vehicle miles traveled can substantially reduce the overall GHG emissions that may occur.
- 2) The CAP fails to identify the use of plastics as a significant GHG source. Because plastic is made from fossil fuels, continued production and consumption of single-use plastic products results in a substantial contribution to GHG emissions. Local measures to reduce consumption, increase recycling, and promote alternative products can ultimately play a significant role to reduce our overall GHG emissions.

We encourage the County to immediately proceed developing implementation plans to determine the CAP measures’ feasibility and effectiveness. The SEC assumes that the CERP would become the vehicle for approving implementation of the individual CAP GHG reduction measures.

We strongly urge that certain measures be immediately implemented to begin reducing carbon emissions as preparation of the CERP proceeds. We believe certain measures can reduce GHG emissions while allowing for further planning and design of the more complex measures, such as carbon farming or transportation system improvements.

For instance, implementation of Measure GHG-09, *Trade-In GHG-Emitting Landscaping Equipment*, should be expedited with a firm commitment to replace County-operated equipment and ultimately equipment operated by private businesses. The program could be coordinated with interested municipalities located in the County, the Sacramento Metropolitan Air Quality Management District, and the Sacramento Municipal Utility District for increased effectiveness and sharing of knowledge from past trade-in programs.

The expedited implementation of this measure would also benefit affected environmental justice groups who own and operate many landscaping businesses, enabling them to contribute to reducing emissions from this significant GHG source. Other measures which should be immediately implemented include the 17-Government Operations GHG reduction measures identified in the CAP. Their implementation should proceed as soon as practicable within budget limits.

The SEC remains very interested in the implementation of the County's GHG reduction efforts. We intend to work closely with the County Sustainability Manager and offer the SEC as a platform for future public participation on this matter. We are encouraged by the County's commitment to complete the CAP and proceed with implementing the GHG reduction measures to achieve the 2030 net zero carbon emission goal.

Sincerely,



Mark White
SEC Chair



Richard Hunn
SEC Vice Chair