700 Block of K Street Final Environmental Impact Report SCH 2010112014

April 2011

Prepared for:
City of Sacramento and
Redevelopment Agency of
the City of Sacramento

700 Block of K Street

Final EIR

SCH 2010112014

City of Sacramento

Community Development Department

300 Richards Boulevard

Sacramento, CA 95811

April 2011

Table of Contents

Chapter 1 Introduction.....1-1
Chapter 2 Revisions to Draft EIR Text.....2-1
Chapter 3 Responses to Comments.....3-1
Chapter 4 Mitigation Monitoring Plan.....4-1

CHAPTER 1: INTRODUCTION

Chapter 1 *Introduction*

This Final Environmental Impact Report (Final EIR) contains a listing of the public and agency comments received during the public review period of the Draft Environmental Impact Report (Draft EIR). This document was prepared by the Lead Agency for the project, the City of Sacramento, in accordance with the California Environmental Quality Act (CEQA) and the CEQA Guidelines, in particular Sections 15089 and15132.

In accordance with Section 15132, this Final EIR consists of the following:

- Revisions to the Draft EIR
- Copies of comments and recommendations received on the Draft EIR
- A list of public agencies and organizations that commented on the Draft EIR
- The responses of the City to significant environmental points raised in the comments and recommendations

Summary of the Proposed Project

Currently, the project site is comprised of eleven underutilized parcels. The proposed project site is almost fully built out with a mix of buildings that were constructed beginning in the late 1800's through the 1950's. A small parcel at the south-westernmost edge of the site adjacent to the alley at 7th Street is vacant... Retail establishments and restaurants previously occupied the ground floors of the buildings, with residential and office uses in the upper levels of some buildings. This portion of the block is representative of the original historic fabric of K Street, with some of the properties listed in the Sacramento Register of Historic and Cultural Resources.

The 700 Block of K Street project (proposed project) proposes a mixed-use development with residential and retail/restaurant/entertainment uses and a parking garage. The development densities would be below those assumed for the site in the Master EIR for the City of Sacramento's 2030 General Plan.

As part of the proposed project, the majority of the existing building facades along K Street would be renovated in order to maintain the existing pedestrian scale and storefront characteristics. The proposed project would redevelop the existing structures along K Street with retail and restaurant uses, and convert the upper floors of several buildings to residential uses. The entire south half of the half block, along the alley, is proposed for demolition and construction of a single five-story residential building over a two-level parking garage. The first level of the garage would be below grade.

This proposed project would also install the infrastructure connections for development of the site.

Project Objectives

- Bring high density, transit-oriented, mixed use development to the block.
- Enhance the pedestrian environment on K Street.
- Reactivate K Street.
- Replace uneconomical land uses with a vibrant mixed-use community to help revitalize downtown.
- Provide a neighborhood retail center.
- Provide additional housing opportunities in the Central Business District.

- Rehabilitate the K Street facades of the Landmark buildings and rebuild and/or renovate the other K Street facades in order to retain the general scale and historic character of this block of buildings along K Street.

Project Entitlements:

The following entitlements are required for the Proposed Project. The potential environmental impacts associated with development in accordance with these entitlements are analyzed in this EIR.

- Special Permit – Major Project for a mixed use project over 75,000 square feet.
- Special Permit – Alcohol to establish bar/pubs
- Special Permit – Parking to partially waive parking for new residential units
- Certificate of Appropriateness – for rehabilitation of Landmarks
- Design Review Approval – for exterior alterations and design of new structures

- Approval of Project Concept
- Disposition and Development Agreement
- Regulatory Agreements
- Finance Agreements

- Either all eleven parcels would be merged into one parcel through an administrative process with the City's Department of Transportation or a tentative map would be submitted to the Community Development Department to divide the commercial and residential uses into two parcels total.

Draft EIR

The Draft EIR includes the following technical analysis chapter:

- Cultural Resources

Public Participation and Review

In accordance with the CEQA Guidelines, a Notice of Preparation (NOP) was released on November 1, 2010 for a 30-day agency and public review period. The NOP was distributed to responsible agencies, interested parties, business owners, residences, and landowners within the project area. The purpose of the NOP was to provide notification that an EIR for the project would be prepared and to solicit guidance on the scope and content of the document. A summary of the comments received on the NOP is included in each technical chapter. A copy of the NOP and NOP response letters received are included in Appendix A.

A public scoping meeting was held on November 18, 2010. Responsible agencies and members of the public were invited to attend and provide input on the scope of the EIR. No comments were received.

A Notice of Completion and copies of the Draft EIR were filed with the State Clearinghouse on July 27, 2010. A Notice of Availability was distributed to the responders to the NOP and the list of agencies, groups, and persons. The 45-day public review period began on July 27, 2010 and ended September 9, 2010.

Copies of the Draft EIR were available for review at the following locations:

City of Sacramento
Community Development Department

300 Richards Boulevard

Sacramento Public Library
828 I Street

Organization of the Final EIR

This document is organized as follows:

Chapter 1: Introduction. This chapter summarizes the project under consideration, including the objectives of the project and the entitlements that are analyzed by this environmental review. Information regarding the issue areas analyzed in the Draft EIR and the methods used to solicit input on the environmental review of the proposed project are also included.

Chapter 2: Revisions to Draft EIR Text. This chapter presents the revisions to the text of the Draft EIR. The revisions were made for one of two reasons: (1) City-initiated clarification, amplification, or corrections to the text that were identified subsequent to the publication of the Draft EIR or (2) revisions in response to comments made on the Draft EIR.

Deleted text is shown by ~~strikethrough~~ and added text is shown by underlined text.

Section 15088.5 of the CEQA Guidelines states the conditions for which a Draft EIR must be re-circulated. None of the revisions to the text of the Draft EIR are the result of a new significant environmental impact, substantial increase in the severity of an environmental impact, or considerable changes to a project alternative or mitigation measure, or fundamental flaws in the Draft EIR. For these reasons, re-circulation of the Draft EIR prior to certification is not necessary.

Chapter 3: Responses to Comments. This chapter contains a list of the commentors on the Draft EIR followed by responses to individual comments.

Each comment letter is presented with brackets showing how the letter was divided for responses by the City. Each comment is given a binomial with the letter designation appearing first, followed by the comment number. For example, comments in Letter A are numbered A-1, A-2, and so on. Immediately following each letter are the City's responses, each with binomials that correspond to the bracketed comments.

If the subject matter of one comment is similar to that of another, the reader is referred to the other comment and the response to review all information on a given subject. Where this occurs, cross-references are provided.

Some comments on the Draft EIR do not pertain to the CEQA issues analyzed in the Draft EIR, do not ask questions about the Draft EIR, or do not question an element or conclusion of the Draft EIR. In such cases, the response will recognize the comment and provide additional information where possible. Some comments express opinions about aspects of the proposed project and these are included in the FEIR for the consideration of the decision-makers.

Chapter 4: Mitigation Monitoring Plan. The intent of the MMP is to prescribe and enforce the proper and successful implementation of the mitigation measures.

Appendix. This section includes conceptual drawings that were made available subsequent to the preparation of the Draft EIR.

CHAPTER 2: REVISIONS TO DEIR TEXT

Chapter 2	Revisions to DEIR Text

Introduction

This chapter shows the text changes to the Draft EIR. New text is indicated by underline and deleted text by ~~strikethrough~~. The changes are presented in the page order they appeared in the Draft EIR.

This chapter presents the revisions to the text of the Draft EIR. The revisions were made for one of two reasons: (1) clarification, amplification, or corrections to the text that were identified subsequent to the publication of the Draft EIR or (2) revisions in response to comments made on the Draft EIR.

The following revisions do not result in a change in the analyses or conclusions in the Draft EIR.

Chapter 3 – Project Description

Figures 3-3 through 3-13 are replaced to show the site plan, floor plans, and elevations as currentlyproposed.

Chapter 4.1 – Cultural Resources

The text on Page 4.1-7, last paragraph, is revised to reflect that no response was received from the NCIC:

The North Central Information Center (NCIC) is the official Cultural Resources Information Center for this area of the State. In accordance with Public Resources Code (PRC) Section 21000 (et seq.), the NCIC was asked to ascertain all known and potential archeological resources within the Project Area. ~~As of the release date of this document for public review, the~~ City ~~has~~ did not ~~yet~~ received a response from the NCIC. ~~If a response is received prior to the certification of the EIR, the City will incorporate the letter and the findings into the Final EIR and, if necessary, revise the analysis in the Draft EIR.~~ As a worst-case scenario, this analysis assumes that there are previously undiscovered cultural resources within the proposed project site.

Chapter 7 - Initial Study - Section 1, Air Quality

The text on Pages 7-6 through 7-8 is revised as follows to state which sections of the CEQA Guidelines are applicable to the discussion of greenhouse gases, to reiterate that the City analyzed and mitigated the significant effects of greenhouse gas emissions at a programmatic level, and to state which General Plan policies and implementation measures to mitigated climate change are applicable to the proposed project. Information about the recently enacted CALGreen Code is also included.

Greenhouse Gas Emissions Discussion

As part of its action in approving the 2030 General Plan, the City Council certified the Master Environmental Impact Report (Master EIR) that evaluated the environmental effects of development that is reasonably anticipated under the new general plan. The Master EIR includes extensive discussion of the potential effects of greenhouse gas emissions. The Master EIR discussions regarding climate change are incorporated here by reference. See:

Draft EIR: 6.1 Air Quality (Page 6.1-1)
Final EIR: City Climate Change Master Response (Page 4-1)

These documents are available at: www.cityofsacramento.org/dsd/planning/environmental-review/eirs/ and at the offices of the Community Development Department at 300 Richards Boulevard, Third Floor, Sacramento, California.

The project-specific analysis of greenhouse gas emissions resulting from this proposed project is tiered from the Master EIR for the General Plan, as provided in Sections 15175 through 15179.5 and 15183.5 of the CEQA Guidelines. The City analyzed and mitigated the significant effects of greenhouse gas emissions at a programmatic level in the Master EIR for the 2030 General Plan.

As determined in the Initial Study, the ~~The~~ proposed project, and the level of development proposed, is an anticipated subsequent project identified and described in the Master EIR. The proposed project is consistent with the General Plan designation for the project site (CBD); therefore, the greenhouse gas emission discussion in the General Plan Master EIR addressed the potential emissions from the proposed project site. Because the amount of emitted CO_2 can be calculated for a specific project on the site, the project's greenhouse gases (GHG) emissions (construction and operational emissions from mobile sources) are discussed below.

Short-term Construction Emissions

During construction of the project GHG emissions would be emitted from the operation of construction equipment and from worker and building supply vendor vehicles. The total CO_2 emissions generated by the construction of the project would be approximately 694.5 metric tons per year for construction of the project. These emissions would equate to approximately 0.0014 percent of the estimated GHG emissions for all sources in California (483 million metric tons).[1] Currently, construction is anticipated to take approximately two years.

Long-term Operational Emissions

The largest source of greenhouse gas emissions associated with the proposed project would be on- and off-site motor vehicle use. CO_2 emissions, the primary GHG emission from mobile sources, are directly related to the quantity of fuel consumed. CO_2 emissions during operation of the project at full build-out of the proposed project would be approximately 2,165 metric tons, which equates to 0.004 percent of California's total emissions.

The development would be required to comply with current California building codes that require structures to incorporate energy efficient materials and design.

Ongoing Activities for the Reduction of GHG Emissions in the City

The 2030 General Plan included direction to staff to prepare a Climate Action Plan for the City. Staff has continued work on this plan since adoption of the 2030 General Plan. The Climate Action Plan will provide additional guidance for the City's ongoing efforts to reduce GHG emissions. The tentative completion date for the Climate Action Plan is 2012. This Plan's purpose is to reduce the City's operational emissions.

Action continues at the State and federal level to combat climate change. In December 2009 the Environmental Protection Agency listed greenhouse gases as harmful emissions under the Clean Air Act. The EPA action could eventually result in regulations that would have as their purpose the reduction of such emissions.

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[1] See Appendix C of the Draft EIR for the URBEMIS modeling results for CO_2.

In January 2011, changes were made to Title 24 of the California Code of Regulations (also known as the *California Green Building Standards Code and the CALGreen Code*). The purpose of the CALGreen Code is to enhance the design and construction of buildings to encourage sustainable construction practices in planning and design that result in energy efficiency, water efficiency and conservation, material conservation and resource efficiency, and environmental quality.

The Master EIR concluded that GHG emissions that could be emitted by all development within the City that is consistent with the 2030 General Plan would be cumulatively considerable and unavoidable (Errata No. 2, Page 12). The Master EIR includes a full analysis of GHG emissions and climate change, and adequately analyzes this impact.

The proposed 700 Block of K Street project is consistent with the 2030 General Plan, and would further advance the City's efforts to promote infill development and strengthening of the urban environment. Buildings constructed as part of the project would be required to comply with current California building codes that enforce energy efficiency, including the recently enacted CALGreen.

Attachment 1 to the Mitigation Monitoring Plan lists the 2030 General Plan Policies and Implementation Measures that Mitigate Climate Change. The proposed project is compliant with the following policies from the list:

- The project is considered infill development (LU 1.1.5) and the redevelopment of an existing urbanized area. The project optimizes the City's investments in infrastructure and community facilities, supports increased transit use, promotes pedestrian and bicycle friendly neighborhoods, ensures the integrity of historic districts, and enhances retail viability.

- The project is infill development where City services are in place (LU 1.1.9).

- The project proposes a mixed-use neighborhood that would accommodate local-serving commercial, employment, and entertainment uses, provides diverse housing opportunities, and would be efficiently served by transit (LU 2.1.4).

- Per Policy LU 2.1.5, the project proposes infill development, redevelopment, rehabilitation, and reuse efforts that contribute positively to existing neighborhoods.

- The project complies with Policy LU 2.6.1 in that it proposes a high density, compact development pattern in a mixed use project that reduces the dependence on automobiles of its future tenants, visitors, and residents.

- The project would revitalize a distressed and under-utilized area (LU 2.6.2).

- The project would incorporate buildings that use less water and energy and would effectively use daylight (LU 2.6.3).

- The project would retain and reuse existing buildings and make the existing structures more energy efficient (LU 2.6.4).

- The project would reduce the existing heat island effect through the installation of at least one green roof (LU 2.6.6).

- The project proposes to engage the street through façade articulations, ground floor transparency, and the location of the parking structure at the rear of the parcels (LU 2.7.7).

- The project proposes the vertical integration of a complementary mix of nonresidential uses that support the future residents (LU 4.4.6 and LU 5.1.5).

- The project proposes commercial and residential development that is adjacent to an existing light rail station, in compliance with LU 5.5.2.

- The project would result in the adaptive reuse of historic resources per Policy HCR 2.1.13.

- The project proposes that the pedestrian entrances to new residential structure face the streets and provide connections to sidewalks (M 2.1.6).

- As previously noted, there is a light rail station is on K Street, fronting the proposed project site. The existing infrastructure would provide direct pedestrian and bicycle access to the station from the project site (M 3.1.12)

- The project proposes 84 parking spaces for the 137 dwelling units. This proposal complies with Policies M6.1.1 and M6.1.4 to reduce the amount of parking.

- The project proposes recycling and reusing materials from the demolished portions of the buildings to the extent feasible and cost effective (U5.1.11 and U5.1.12).

- The project would upgrade, through replacement, the appliances and HVAC systems in the existing structures so that they meet the new energy standards (U6.1.11).

- The project would not hinder the City's efforts to meet Statewide greenhouse reduction goals (ER 6.1.3).

- Per Policy ER 6.1.5, the project would discourage auto-dependent sprawl and dependence on a private automobile, promote water conservation through the use of low flow toilets in a compact development that is mixed use, pedestrian- and transit-oriented.

The following Conditions of Approval are required to specifically further reduce the emissions of greenhouse gases from the proposed project:

> All toilets on the project site shall be low-flow.
>
> At a minimum, the project shall include construction of a green roof to the satisfaction of the Planning Director.
>
> High HTC-rated and energy efficient windows shall be installed in the residential and commercial areas and storefronts. For the four structures that are historic per CEQA, the original windows will be repaired or replaced in accordance with the Secretary of the Interior's Rehabilitation Standards.

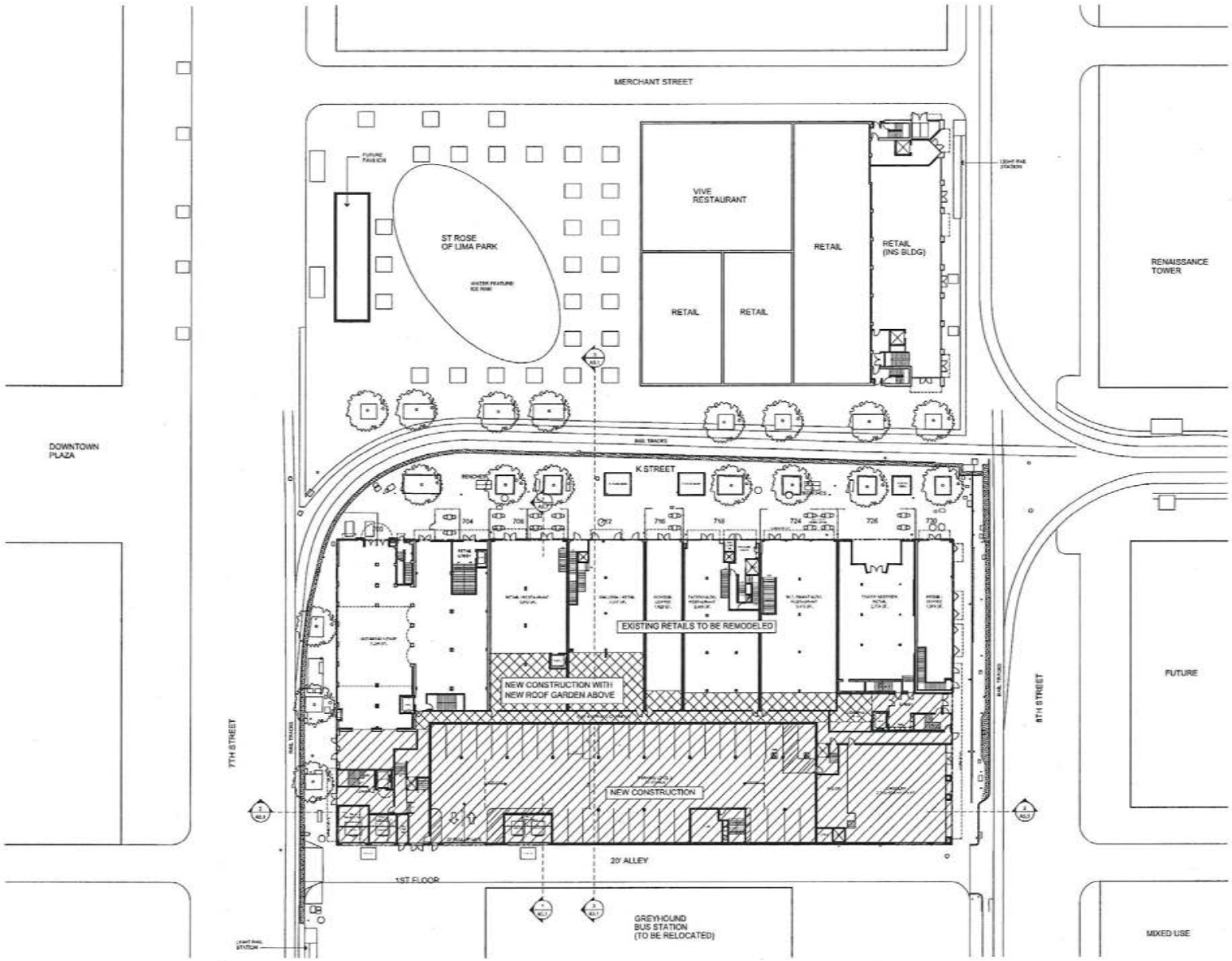
The project is consistent with the City's goals as set forth in the 2030 General Plan and Master EIR relating to reduction of GHG emissions. There are no uses proposed on the project site that could result in higher emissions of greenhouse gases than assumed for the type of development envisioned in the General Plan.

The project would not impede the City's efforts to comply with AB 32 requirements. The project would not have any significant additional environmental effects relating to GHG emissions or climate change.

Chapter 7 - Initial Study - Section 10 - Public Utilities

The text on Page 7-38, fifth paragraph is revised to delineate the responsibilities of the SMUD as it pertains to infrastructure improvements and to reflect new information that the existing vault would not serve the proposed project:

SMUD has underground electric lines and a vault in K Street and is evaluating the option of allowing some portions of the proposed project be served by the existing transformer in K Street. In any case, new transformers would be installed by SMUD in the proposed new building to serve either a part, or all, of the proposed development ~~The existing electric transformer (in the vault) would serve the retail and restaurant portions of the project, while a new transformer would serve the residential units. The new transformer would be installed in the proposed new building~~; and therefore, the installation would not result in any significant impacts not addressed by the other issue areas in this environmental review.



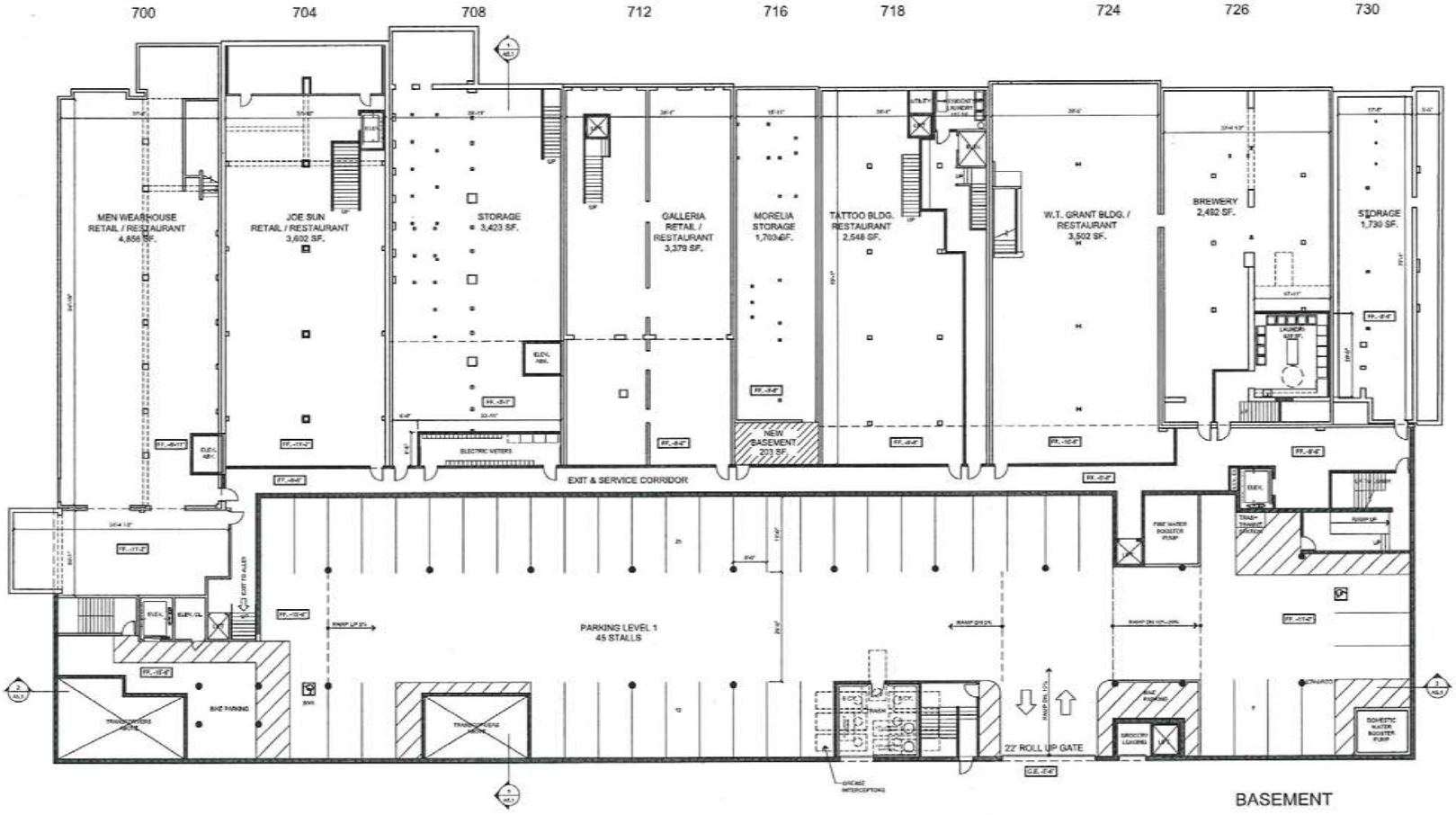
700 BLOCK INVESTORS LP

700 BLOCK

700 K STREET SACRAMENTO, CA

SITE PLAN

Figure 3-3



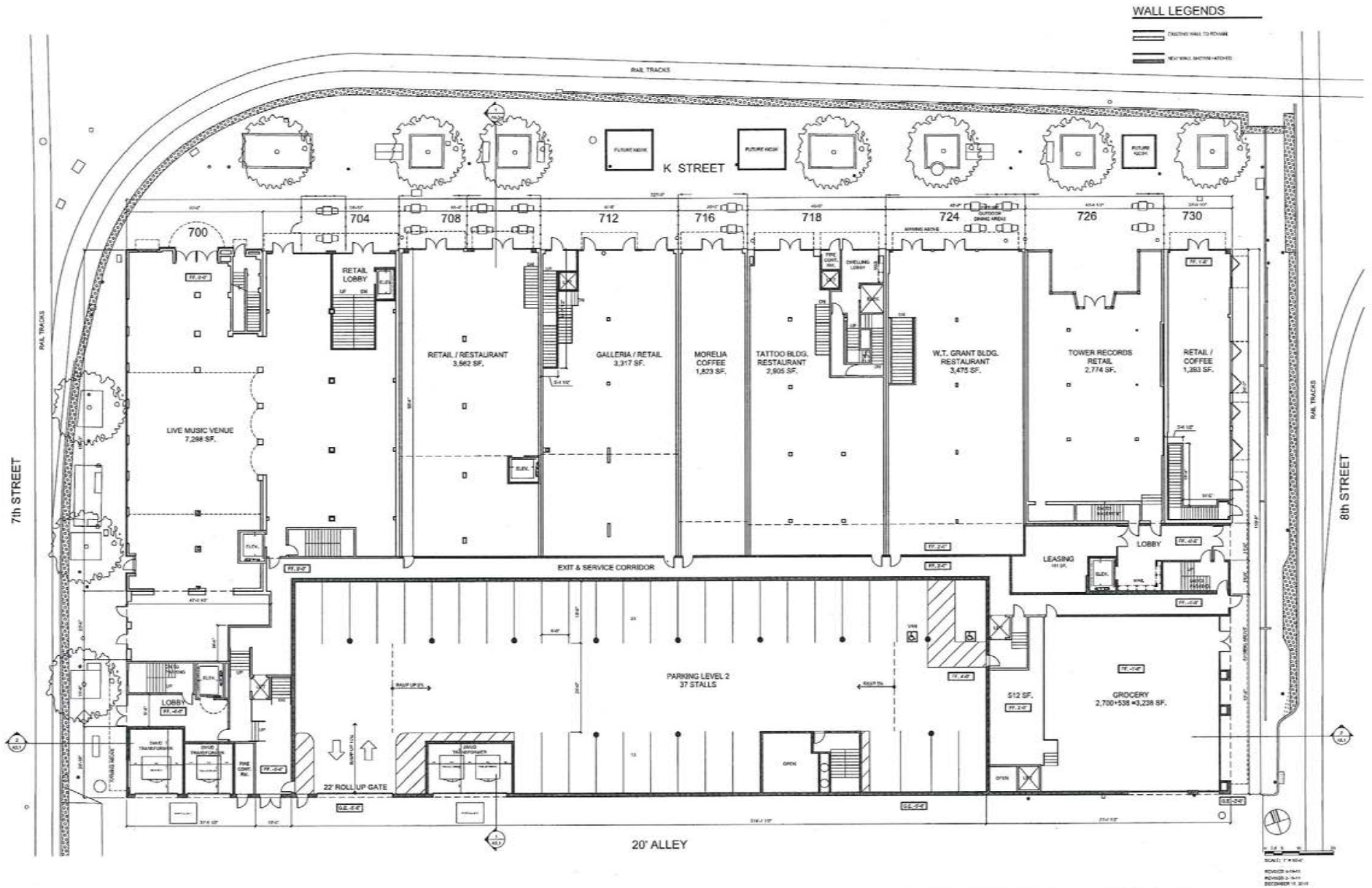
700 BLOCK
INVESTORS LP

700 BLOCK

700 K STREET SACRAMENTO, CA

BASEMENT FLOOR PLAN

Figure 3-4



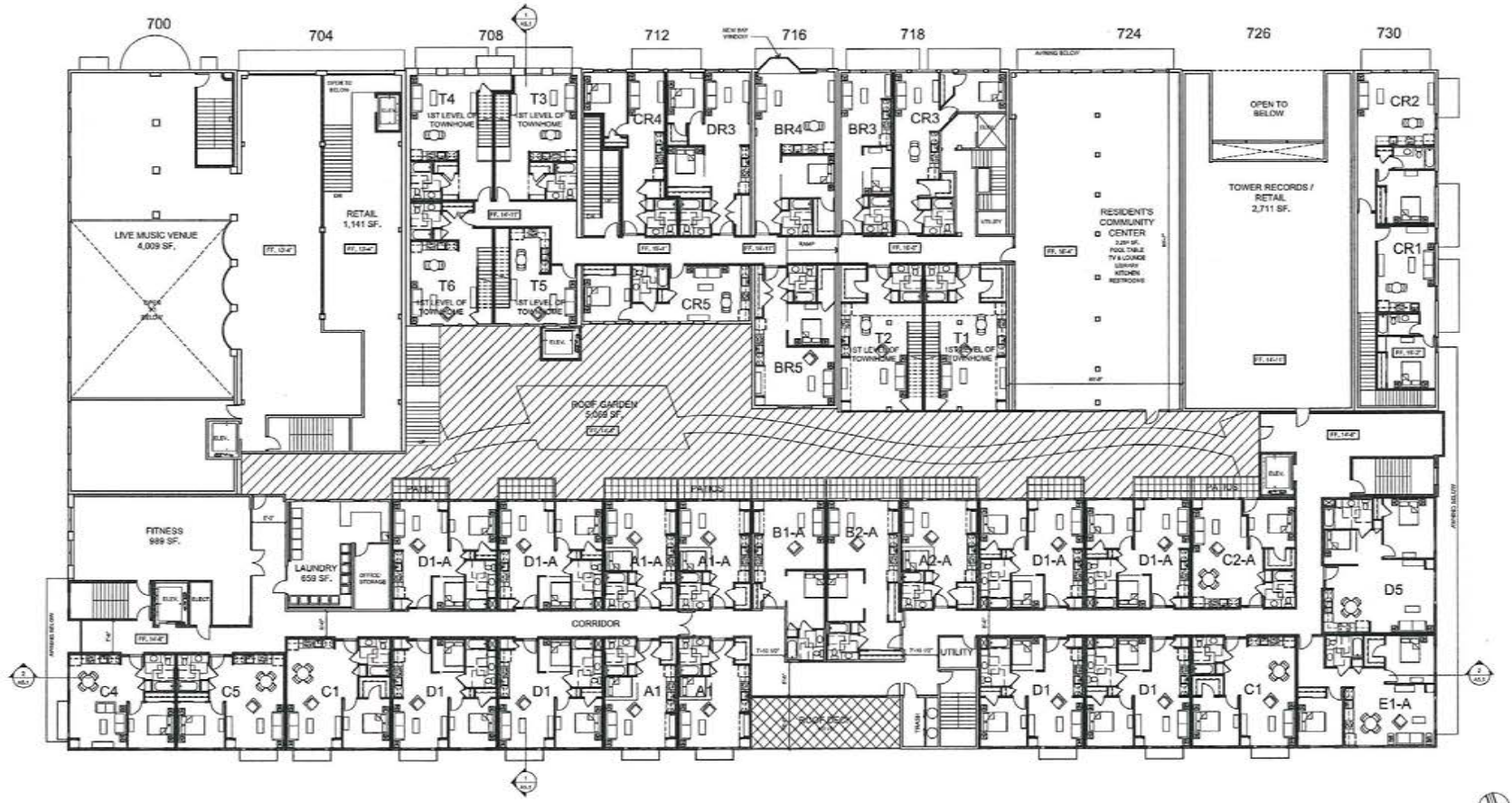
700 BLOCK INVESTORS LP

700 BLOCK

700 K STREET SACRAMENTO, CA

1ST FLOOR PLAN

Figure 3-5



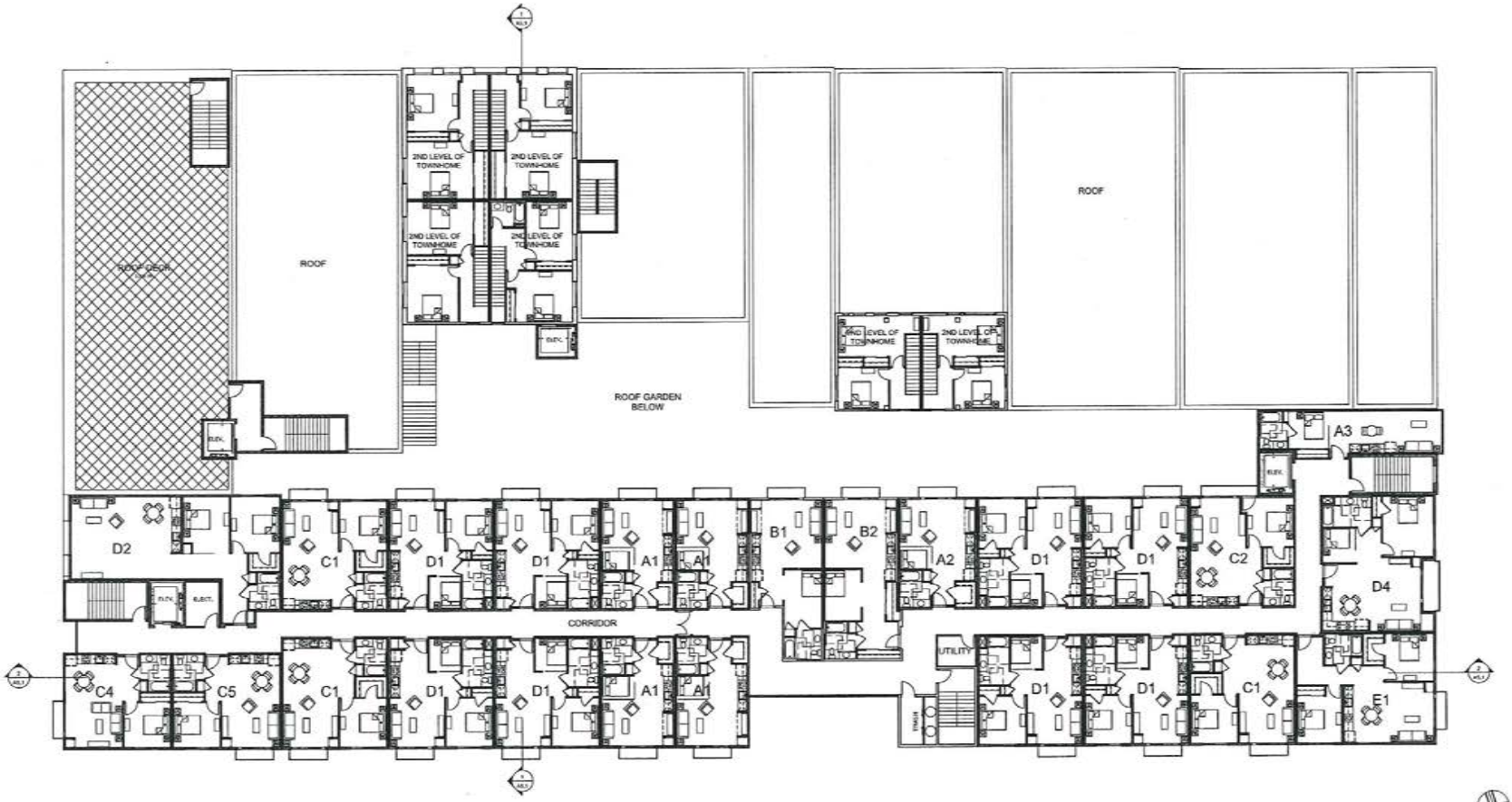
700 BLOCK
INVESTORS LP

700 BLOCK

700 K STREET SACRAMENTO, CA

2ND FLOOR PLAN

Figure 3-6



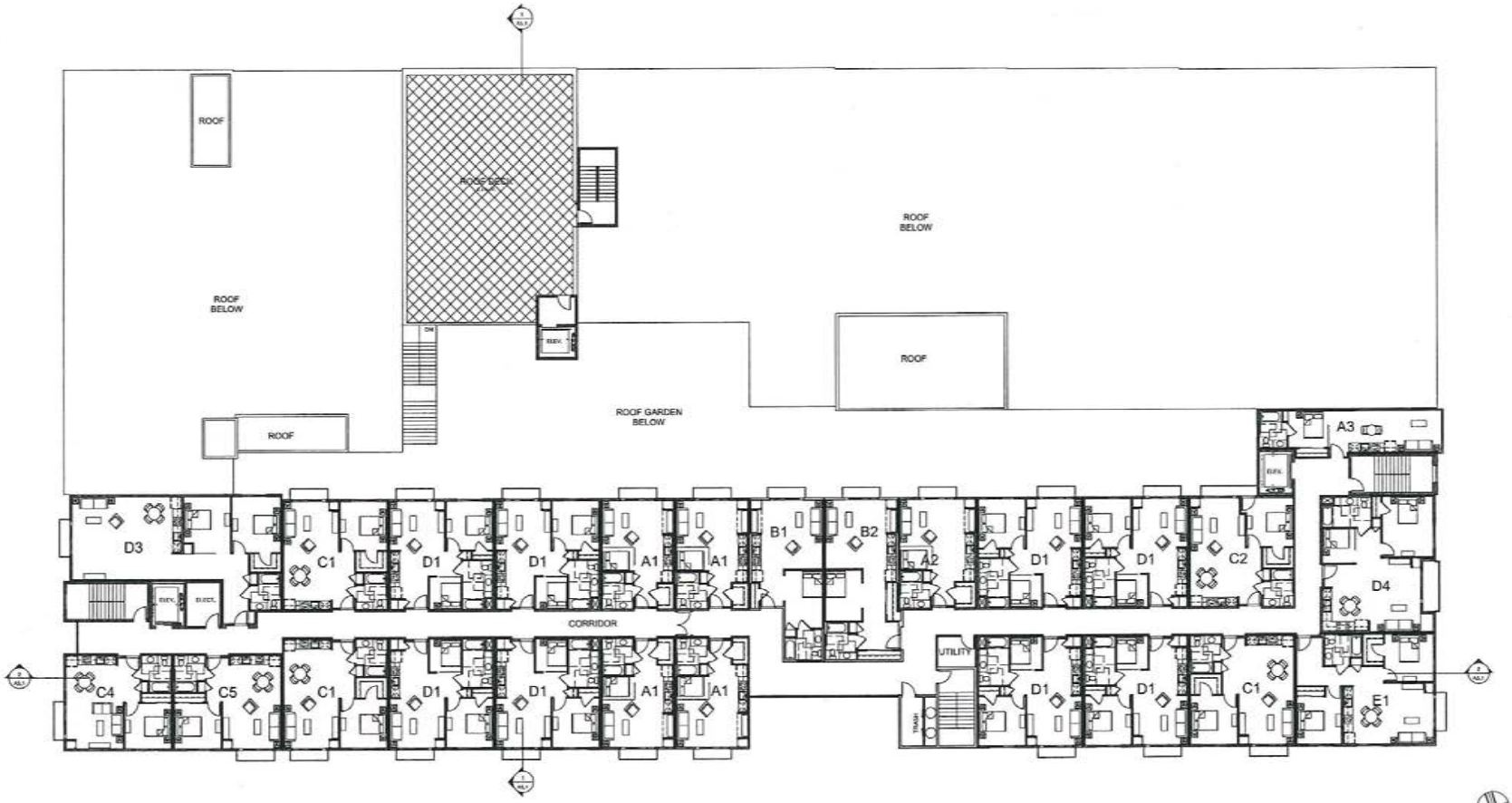
700 BLOCK
INVESTORS LP

700 BLOCK

700 K STREET SACRAMENTO, CA

3RD FLOOR PLAN

Figure 3-7



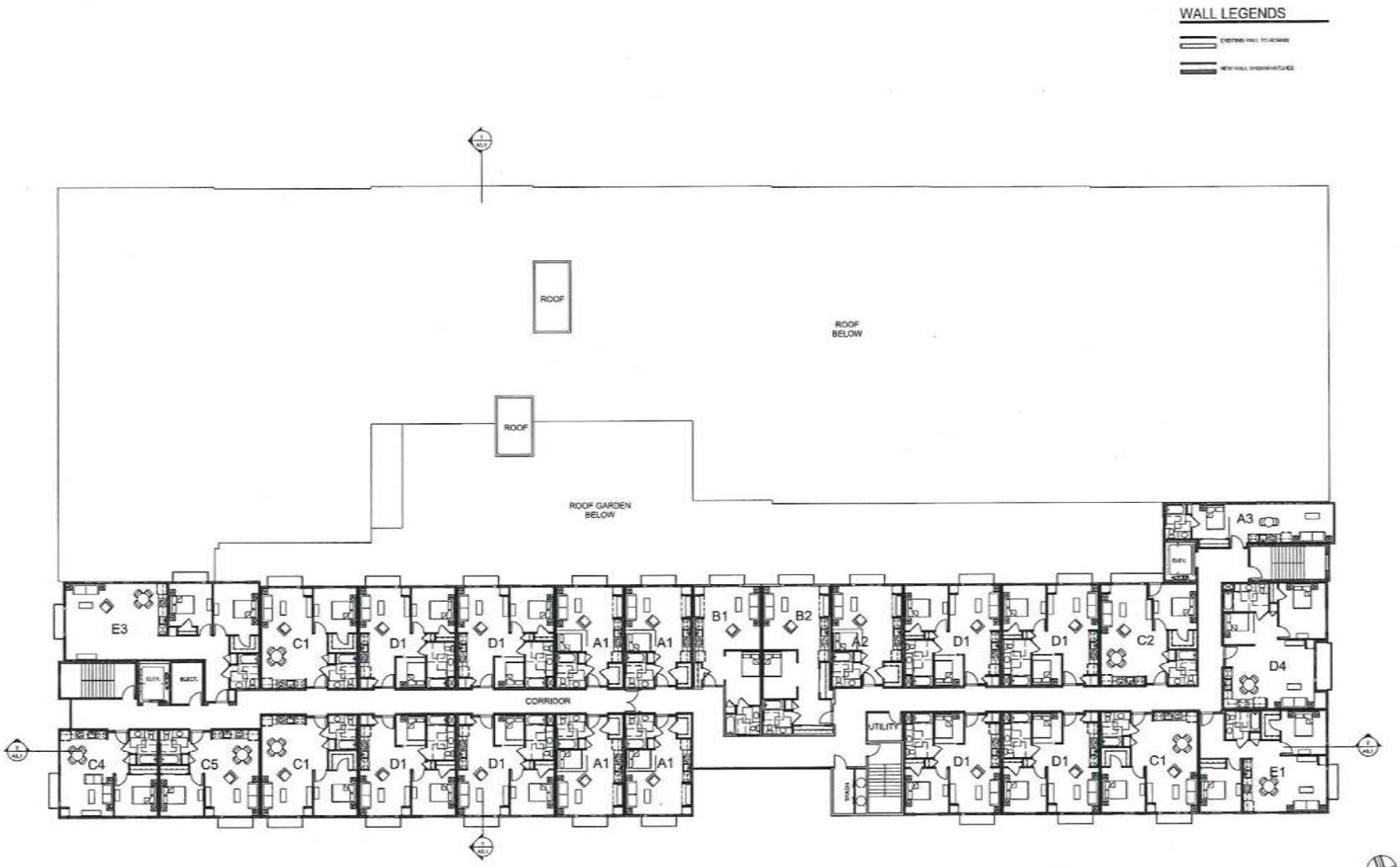
700 BLOCK
INVESTORS LP

700 BLOCK

700 K STREET SACRAMENTO, CA

4TH FLOOR PLAN

Figure 3-8



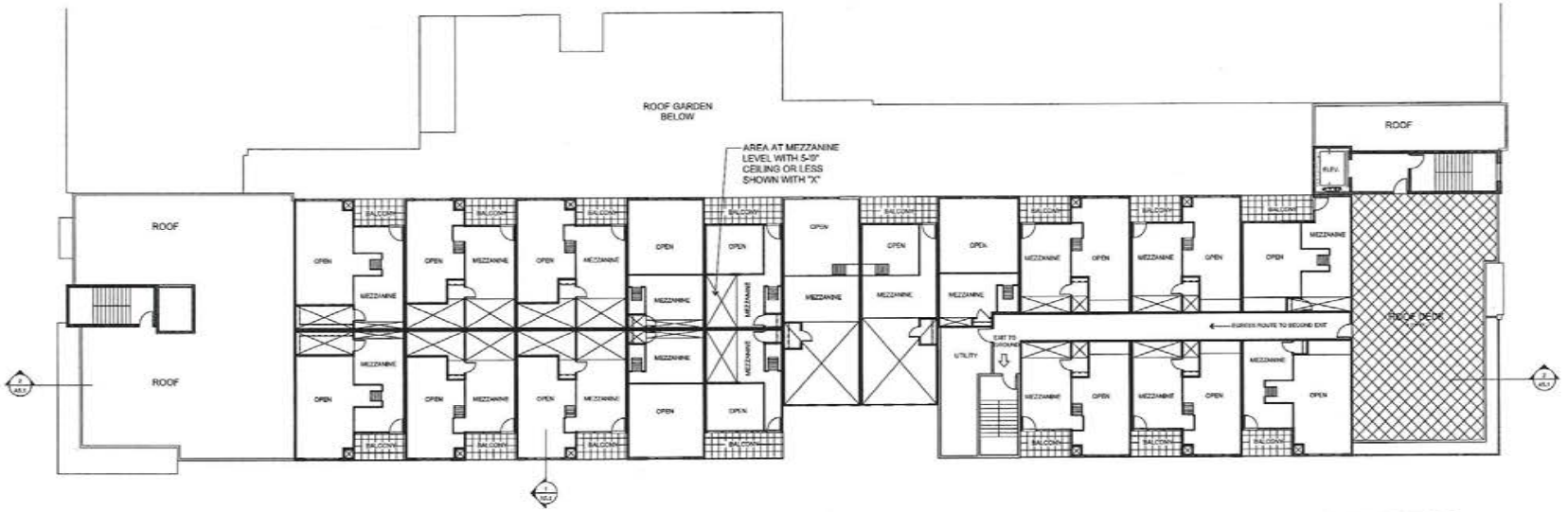
700 BLOCK
INVESTORS LP

700 BLOCK

700 K STREET SACRAMENTO, CA

5TH FLOOR PLAN

Figure 3-9

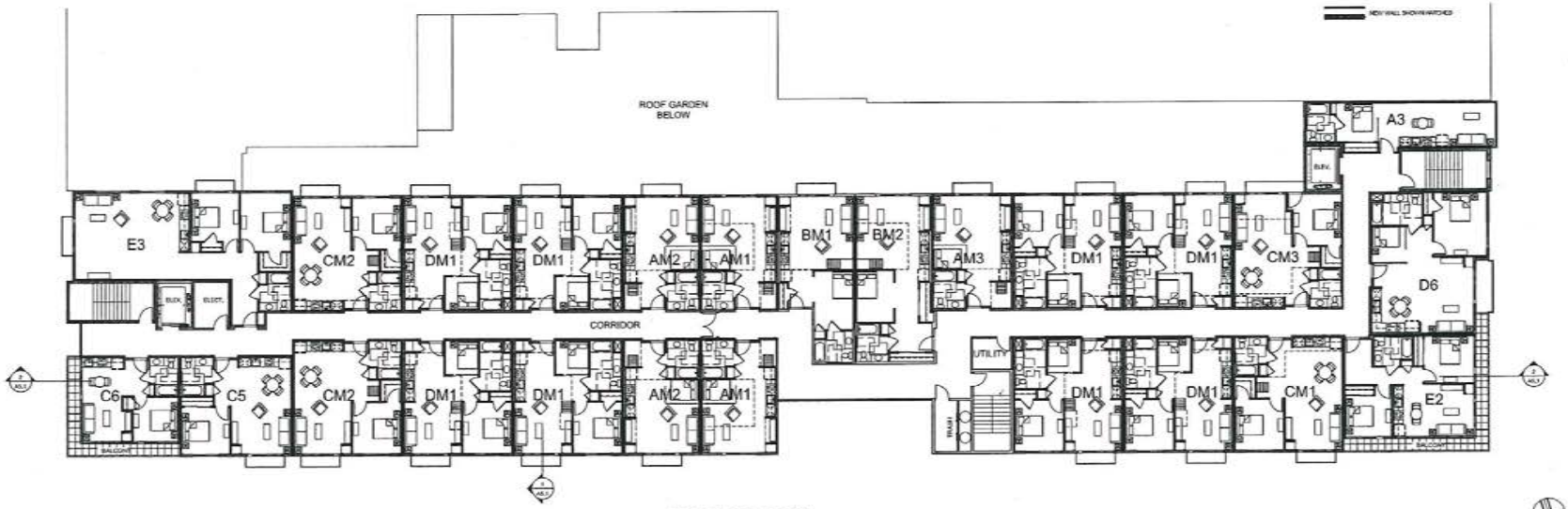


MEZZANINE FLOOR / ROOF DECK PLAN

WALL LEGENDS

EXISTING WALL TO REMAIN

NEW WALL SHOWN HATCHED



6TH FLOOR PLAN

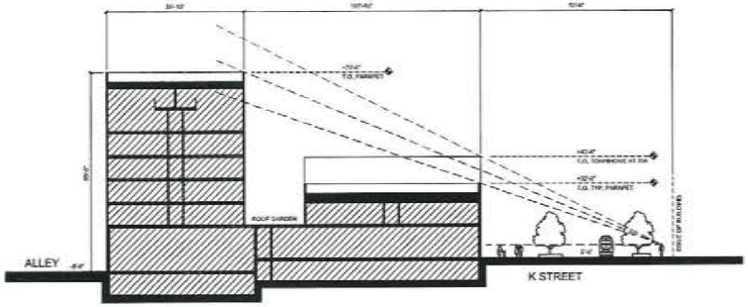
700 BLOCK INVESTORS LP

700 BLOCK

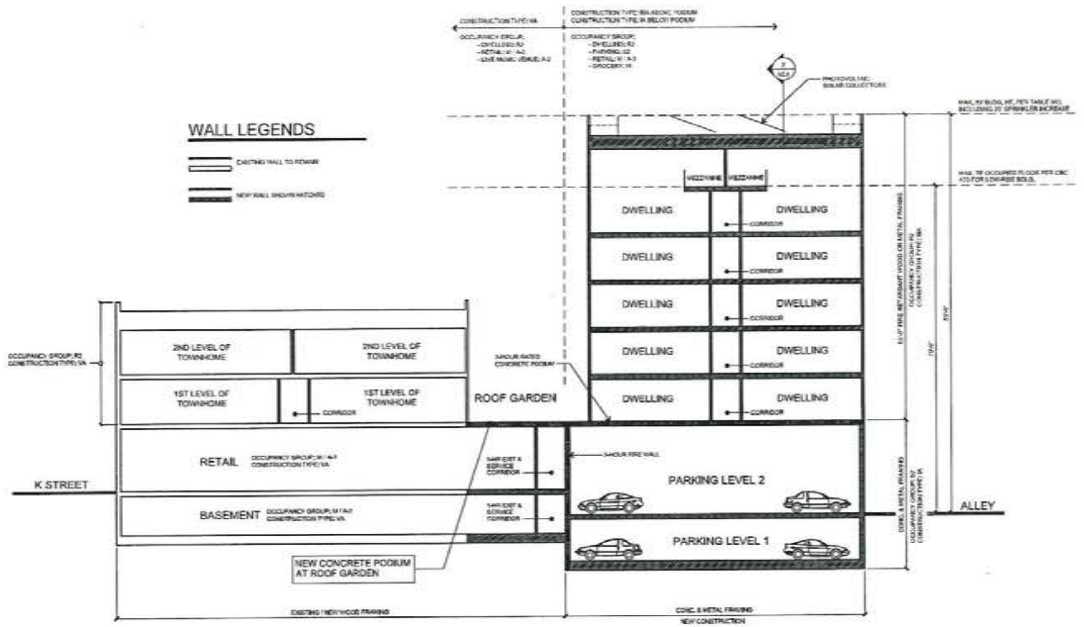
700 K STREET SACRAMENTO, CA

6TH FLOOR PLAN AND MEZZANINE FLOOR

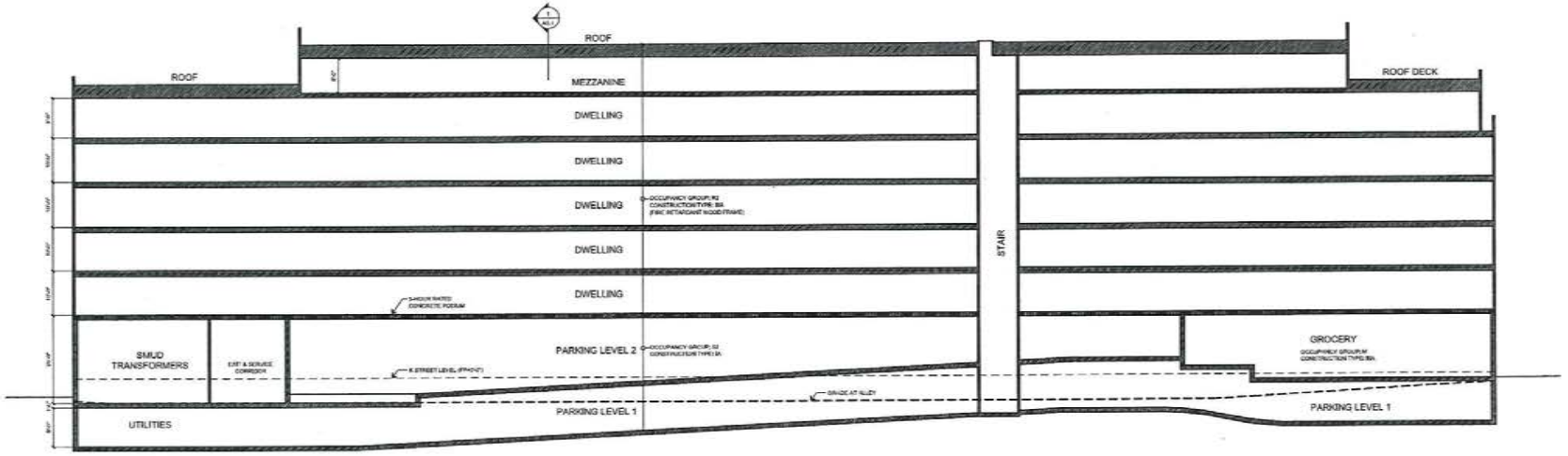
Figure 3-10



SITE SECTION 3



SECTION 1



SECTION 2

700 BLOCK INVESTORS LP

700 BLOCK

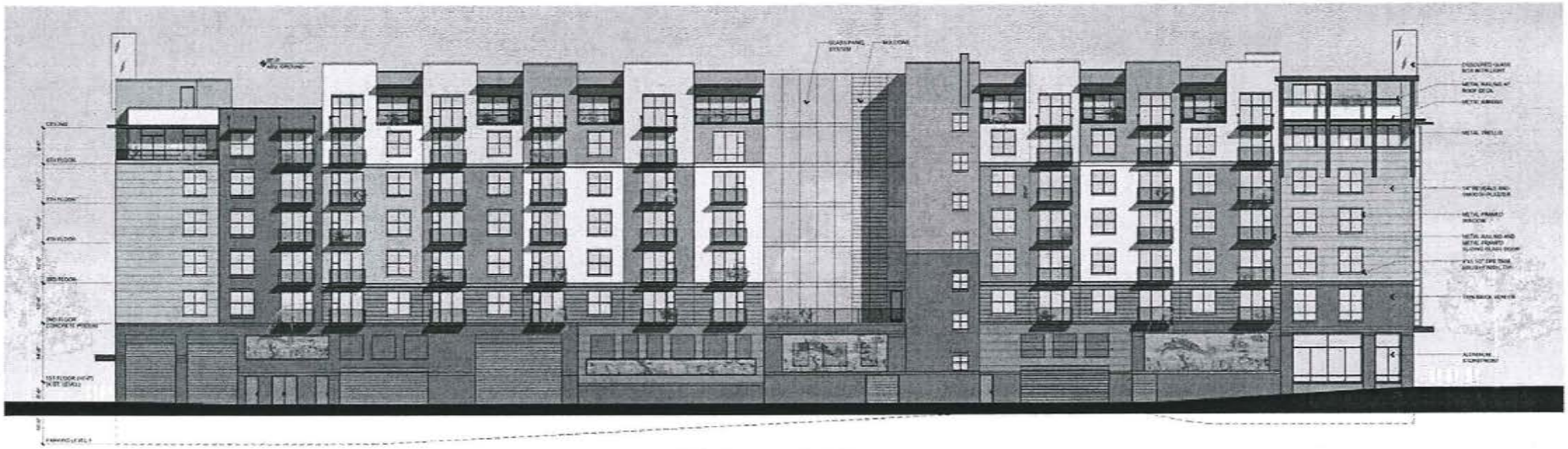
700 K STREET SACRAMENTO, CA

BUILDING SECTIONS

Figure 3-11

WEST / 7TH STREET ELEVATION

EAST / 8TH STREET ELEVATION



SOUTH / ALLEY ELEVATION

700 BLOCK
INVESTORS LP

700 BLOCK

700 K STREET SACRAMENTO, CA

SOUTH, EAST & WEST ELEVATIONS

Figure 3-12

NORTH ELEVATION AT ROOF GARDEN

NORTH / K STREET ELEVATION

700 BLOCK
INVESTORS LP

700 BLOCK

700 K STREET SACRAMENTO, CA

NORTH ELEVATIONS

Figure 3-13

CHAPTER 3: RESPONSES TO COMMENTS

Chapter 3 — Responses to Comments

List of Agencies, Organizations, and Persons Commenting

Local Agencies

Letter A Sacramento Metropolitan Air Quality Management District (SMUD)
James Joseph Hurley

April 4, 2011

Letter B Sacramento Municipal Utility District (SMUD)
Rob Ferrera, Environmental Specialist

April 6, 2011

Organizations

Letter C Center for Biological Diversity
Matthew Vespa, Senior Attorney

February 28, 2011

Letter D Environmental Council of Sacramento (ECOS)
Jonathan Ellison, ECOS Board President

March 24, 2011

Letter E Walk Sacramento
Chris Holm, Project Analyst

April 5, 2011

Letter F Sacramento Area Bicycle Advocates (SABA)
Jordan Lang, Project Assistant

March 20, 2011

Letter A

SACRAMENTO METROPOLITAN
AIR QUALITY
MANAGEMENT DISTRICT

Larry Greene
AIR POLLUTION CONTROL OFFICER

April 4, 2011

Jenifer Hageman
City of Sacramento, Development Services Department
300 Richards Boulevard
Sacramento, CA 95811

Subject: The 700 Block of K Street Project DEIR

Dear Ms. Hageman,

The Sacramento Metropolitan Air Quality Management District (District) is writing to express support for the proposed development of 700 Block of K Street. It is the District's position that the project's density, design, and location are consistent with smart growth principals that will reduce the per capita vehicle miles travelled (VMT) and associated emissions of air pollutants. The project is also consistent with goals of the SACOG Regional Blueprint, the City's General Plan, and will enhance the existing neighborhood by increasing the amount of housing available downtown.

Recognizing that 47 percent of our/the region's ozone precursor emissions come from on-road mobile sources[1], it is essential that new residential units minimize the need for use of personal motor vehicles. The 700 Block of K street features minimum parking and a transit-supportive density proximate to a light rail station - features that have been linked to a reduction in personal motor vehicle use[2]. A-1

There is a causal relationship between land use decisions and air quality. Consequently, California Health and Safety Code Section 40961 directs the District to "represent the citizens of the Sacramento District in influencing the decisions of other public and private agencies whose actions may have an adverse impact on air quality." The Code also states in Section 41015 that in exercising this duty, the District may not infringe upon the authority of local governments to plan or control land use. The District is always cognizant that it is up to the Sacramento City Council to shape the land use policies for the City, but it is our responsibility to attempt to bring air quality considerations to the forefront. These comments are consistent with the City's goals for Inter-governmental Coordination[3], as outlined in the Administration and Implementation section of the General Plan.

The District encourages the City Council to consider the project's potential to benefit regional air quality when it is presented for approval.

Sincerely,

Joseph James Hurley

[1] Sacramento Region 2005 Ozone-Precursor Emissions Inventory, available online at: http://www.airquality.org/
[2] Online TDM encyclopedia, Victoria Transportation Institute; http://www.vtpi.org/tdm/tdm81.htm
[3] City of Sacramento General Plan, Part 4 Administration and Implementation, page 4-8

Letter A
Joseph James Hurley
Sacramento Metropolitan Air Quality Management District (SMAQMD)
April 4, 2011

Response to Comment A-1

The District expresses its support for the proposed project at the 700 Block of K Street and encourages the City Council to consider the project's potential to benefit regional air quality.

The comment does not raise specific issues related to the adequacy of the Draft EIR and no response is necessary.

SMUD
SACRAMENTO MUNICIPAL UTILITY DISTRICT
The Power To Do More.®

Letter B

P.O. Box 15830, Sacramento, CA 95852-1830; 1-888-742-SMUD (7683)

April 6, 2011

Ms. Jennifer Hageman
Senior Planner
City of Sacramento, Development Services Department
300 Richards Boulevard
Sacramento, CA 95811

Subject: Comments on the Draft Environmental Impact Report (DEIR) for the 700 Block of K Street Project

Dear Ms. Hageman,

Thank you for the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the 700 Block of K Street Project. The Sacramento Municipal Utility District (SMUD) is the primary energy provider for the City of Sacramento and the proposed project location. SMUD's vision is to empower our customers with solutions and options that increase energy efficiency, protect the environment, reduce global warming, and lower the cost to serve our region. As a Responsible Agency, SMUD aims to ensure that the proposed project limits the potential for significant environmental effects on SMUD facilities, employees, and customers. B-1

SMUD's participation in the California Environmental Quality Act (CEQA) public review process ensures that our community power requirements are integrated into the planning and environmental review process. Our CEQA involvement is consistent with SMUD's strategic directives and core values, which call for us to ensure a safe environment for its employees and customers (Policy SD-6) and to promote environmental leadership through community engagement, improved pollution prevention, energy efficiency and conservation (Policy SD-7). B-2

It is our desire that the Proposal to Construct the 700 Block of K Street Project EIR will acknowledge any project impacts related to the following:

- Overhead and or underground transmission line easements
- Electrical load needs/ requirements
- Energy Efficiency
- Utility line routing

B-3

Based on our review of the DEIR and our understanding of the proposed project, SMUD offers the following project specific comments:

1. **Energy Efficiency:** SMUD recommends a minimum energy performance goal that exceeds the project's Title 24 energy requirements by 15%. SMUD offers a number of programs to provide the Developer reach this goal including Savings by Design, the District's energy efficiency program for new commercial and mixed use construction, and the Zero Energy Research & Development program. B-4

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In alignment with regional efforts in sustainability, including the Mayor's Greenwise initiative, Savings by Design offers enhancements to the Developer for LEED registration. SMUD's Greenergy program, providing power generated from offsite renewable resources, can further assist this project in satisfying detailed and specific requirements associated with achieving LEED Certification. SMUD also recommends that the development team explore the use of onsite renewable energy through Solar Hot Water and Solar PV technologies. SMUD's SB1 program provides a financial incentive structure for Solar PV.

2. **Energy Delivery (Capacity):** Please continue to coordinate with SMUD staff regarding the proposed energy delivery assumptions associated with the proposed project site. B-5

3. **Energy Delivery (Infrastructure):** The Initial Study provides an analysis of the proposed on-site and off-site energy infrastructure improvements needed to construct and operate the proposed project (page 7-38). Should the City's infrastructure improvement approach change significantly, the City should adjust the EIR analysis accordingly to address new direct or indirect impacts associated with the proposed change. B-6
   In addition, the EIR should clearly delineate the responsibilities of SMUD and the Lead Agency, as it pertains to infrastructure improvements.

SMUD would like to be kept apprised of the planning, development, and completion of this project. Environmental leadership is a core value of SMUD and we look forward to collaborating with you on this project. Again, we appreciate the opportunity to comment on the Draft EIR. If you have any questions regarding this letter, please feel free to contact me at (916) 732-6676. B-7

Sincerely,

Rob Ferrera
Environmental Specialist
Environmental Management
Legislative & Regulatory Affairs
Sacramento Municipal Utility District

Cc: Pat Durham
Jose Bodipo-Memba
Greg Hribar
Steve Johns
Jack Graham
Gary Verbecke

Letter B
Rob Ferrera, Environmental Specialist
Sacramento Municipal Utility District (SMUD)
April 6, 2011

Response to Comment B-1

The comment is an introductory paragraph. The comment does not raise specific issues related to the adequacy of the Draft EIR and no response is necessary.

Response to Comment B-2

The comment discusses the involvement of SMUD in the environmental analyses of projects in accordance with CEQA. The comment does not raise specific issues related to the adequacy of the Draft EIR and no response is necessary.

Response to Comment B-3

SMUD requests that project impacts related to energy transmission, energy supply, and energy infrastructure be addressed in the EIR for the proposed project. See Responses to Comments B-4 through B-6 for specific comments and the responses.

Response to Comment B-4

Because the proposed project (1) was determined to be consistent with the City's General Plan, (2) tiered the analyses from the Master EIR for the General Plan, (3) does not propose land uses that would result in a greater level of GHG emissions than previously assumed for the project site in the General Plan, and (4) would comply with the General Plan policies and mitigation monitoring plan for climate change, there is not a City policy to require the projects to exceed the current requirements. The suggestions made by SMUD to require a greater energy performance goal will be passed on to the decision makers and applicant for the project.

The comment does not raise specific issues related to the adequacy of the Draft EIR and no response is necessary.

Response to Comment B-5

SMUD requests continued coordination with their staff regarding the energy delivery assumptions associated with the proposed project. This information will be passed on to the project applicant and City staff.

The comment does not raise specific issues related to the adequacy of the Draft EIR and no response is necessary.

Response to Comment B-6

SMUD requests a revised analysis if the on- and/or off-site energy infrastructure improvements change from that assumed for the project in the Draft EIR analysis. This information will be passed on to the project applicant and City staff.

In response to the request by SMUD, the text on Page 7-38, fifth paragraph is revised to delineate the responsibilities of the SMUD as it pertains to infrastructure improvements and to reflect new information

that the existing vault would not serve the proposed project. Please also see the fourth paragraph, second sentence on the same page for another delineation of the responsibilities of SMUD and the Lead Agency.

> SMUD has underground electric lines and a vault in K Street and is evaluating the option of allowing some portions of the proposed project be served by the existing transformer in K Street. In either case, new transformers would be installed by SMUD in the proposed new building to serve either a part, or all, of the proposed development; ~~The existing electric transformer (in the vault) would serve the retail and restaurant portions of the project, while a new transformer would serve the residential units. The new transformer would be installed in the proposed new building;~~ and therefore, the installation would not result in any significant impacts not addressed by the other issue areas in this environmental review.

The comment does not raise specific issues related to the adequacy of the Draft EIR and no response is necessary.

Letter C

CENTER *for* BIOLOGICAL DIVERSITY

February 28, 2011

Via Electronic Mail and Certified Mail with CD of Attached Exhibits

Jennifer Hageman, Senior Planner
City of Sacramento, Community Development Department
300 Richards Blvd.
Sacramento, CA 95811
jhageman@cityofsacramento.org

Via Electronic Mail

Shelly Amrhein
Sacramento Housing & Redevelopment Agency
801 12th Street
Sacramento, CA 95814
ramrhein@shra.org

Re: Comments on the 700 Block of K Street Draft Environmental Impact Report

Ms. Hageman and Ms. Amrhein:

These comments are submitted on behalf of the Center for Biological Diversity (the "Center") on the 700 Block of K Street (the "Project") Draft Environmental Impact Report ("DEIR"). The Center is a non-profit, public interest environmental organization dedicated to the protection of native species and their habitats through science, policy, and environmental law. The Center's Climate Law Institute works to reduce greenhouse gas emissions to protect biological diversity, our environment, and public health. The Center has 44,000 members, throughout California and the United States, including in the City of Sacramento. Center members will be directly impacted by the Project. C-1

The Project contemplates a mixed-use development consisting of 153 residential units, 63,780 square feet of commercial space, and a parking structure. While the Center appreciates that mixed use redevelopment projects are considerably more greenhouse gas efficient that typical suburban sprawl, the seriousness of the climate crisis demands that all feasible action be taken to reduce greenhouse gas impacts from all project types and that a greenhouse gas analysis be legally sufficient, regardless of project location and design. Here, the DEIR improperly cuts off an analysis of the Project's greenhouse gas impacts by claiming the Project is consistent with the City's General Plan. Because the General Plan concluded that greenhouse gas impacts were significant and unavoidable and, in any event, the General Plan does not contain sufficient analysis to merit tiering C-2

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C-2 cont.

under Guideline §§ 15064(h)(3) and 15183.5, the DEIR's truncated greenhouse gas analysis fails to comply with CEQA. By simply pointing to a Master EIR that admitted impacts were significant, the DEIR skirted its project-level obligation to acknowledge the significance of its greenhouse gas impacts and adopt feasible mitigation measures that would reduce Project emissions.

C-3

To remedy this defect, the Center urges the City to re-evaluate the significance of the Project's greenhouse gas impacts. One possibility is to apply thresholds adopted by the Bay Area Air Quality Management District. Once significance is determined, the Project can incorporate mitigation measures, such as those proposed by CAPCOA in *Quantifying Greenhouse Gas Mitigation Measures*, to reduce Project emissions to a less-than-significant level.

I. The DEIR's Analysis of Impacts from the Project's Greenhouse Gas Emissions is Inadequate

A. The DEIR Appears to Understate Project Emissions

C-4

CEQA requires a "good faith effort at full disclosure." Guideline § 15151. The DEIR claims that Project emissions are 2,165 metric tons. However, the brevity of the discussion makes it unclear if this is attributable only to mobile source emissions or the entirety of the Project's carbon footprint, including emissions from electricity and natural gas, water consumption, solid waste, and refrigerants. Modeling is readily available to provide data on emissions from these sources. (See, e.g., BAAQMD, Greenhouse Gas Model User's Manual (April 2010); CAPCOA, CEQA & Climate Change (2008).) To comply with CEQA's informational requirements, please provide additional analysis on the greenhouse gas emissions resulting from the Project.

B. The DEIR's Significance Threshold Is Fatally Flawed

The DEIR appears to conclude that, because the Master EIR for the City General Plan "adequately addresses" greenhouse gas issues, the Project need take no further action to reduce its emissions. This reasoning is in direct contravention of CEQA's tiering provisions. The Master EIR for the City General Plan concluded that "greenhouse gas emissions that could be generated by development consistent with the 2030 General Plan would be a cumulatively considerable contribution to climate change, and the impact is, therefore, a **significant cumulative impact.**" (Sacramento 2020 General Plan, MEIR at 8-60 (emphasis in original)). Accordingly, consistency with the General Plan does not render the Project's impacts less than significant. Simply stating, as the DEIR does, that the Project would not have any *additional* environmental effects relating to climate change beyond those identified in the MEIR does not exculpate the Project from recognizing the significance of Project impacts and then adopting all feasible mitigation measures and alternatives to reduce Project emissions.

C-5

While the Center supports the use of programmatic documents to streamline the greenhouse gas analysis at the project-level, no such programmatic document is available

C-5 cont.

here. The Center encourages the City to prepare a Climate Action Plan consistent with the requirements of Guideline § 15183.5. Until such time as this plan is adopted however, the City cannot legitimately avoid its obligation to analyze and mitigate greenhouse gas emissions at the project-level simply by claiming that the 2030 General Plan already concluded that greenhouse gas impacts of development consistent with the General Plan are significant. To do so makes a mockery of CEQA's substantive mitigation requirements.

To analyze the Project's greenhouse gas impacts, the DEIR can use thresholds developed by the Bay Area Air Quality Management District (BAAQMD). After considerable analysis, BAAQMD developed a threshold of 1,100 tons or an alternative 4.6 metric ton per service population (population + employment). (BAAQMD, CEQA Guidelines Updates, Proposed Thresholds of Significance (May 2010). Notably, the 4.6 per capita number is based on statewide data and is applicable to this Project. The 1,110 ton threshold, while based on Bay Area specific data, is roughly analogous to that of Sacramento and is currently being used by other jurisdictions, like Santa Barbara County. (Santa Barbara County Interim Procedures for Evaluating GHGs under CEQA (2010); Santa Barbara County, Support for use of BAAQMD Thresholds (2010).) C-6

C. The DEIR Should Adopt Additional Mitigation to Reduce Project Emissions

Once the Project's greenhouse gas impacts are properly quantified and analyzed, the DEIR should consider adoption of specific measures to reduce emissions. CAPCOA's *Quantifying Greenhouse Gas Mitigation Measures* provides helpful information on specific project design features that reduce emissions and methods to quantify reductions from adopted mitigation. Measures the Project should consider include, but are not limited to, improvements from Title 24 requirements applicable at the time building permits are issued, on-site renewable energy, use of "cool" roofs, energy efficient boilers, increased density, low-flow water fixtures, limited parking supply and off-site mitigation. C-7

II. The DEIR Must Be Recirculated

CEQA requires recirculation of a revised draft EIR "[w]hen significant new information is added to the environmental impact report" after public review and comment on the earlier draft DEIR. Pub. Res. Code § 21092.1. This includes the situation where, as here, "[t]he draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded." Guidelines § 15088.5(b)(4). The opportunity for meaningful public review of significant new information is essential "to test, assess, and evaluate the data and make an informed judgment as to the validity of the conclusions to be drawn there from." *Sutter Sensible Planning, Inc. v. Sutter County Board of Supervisors*, 122 Cal.App.3d 813, 822 (1981); *City of San Jose v. Great Oaks Water Co.*, 192 Cal.App.3d 1005, 1017 (1987). An agency cannot simply release a draft report "that hedges on important environmental issues while deferring a more detailed analysis to the final [EIR] that is insulated from C-8

public review." *Mountain Lion Coalition v. California Fish and Game Comm'n*, 214 Cal.App.3d 1043, 1053 (1989). Given the DEIR's complete failure to adequately analyze the Project's greenhouse gas impacts, recirculation is warranted.

Thank you for considering these comments. If you have any questions, please contact Matt Vespa, mvespa@biologicaldiversity.org, (415) 436-9682 x309.

Please ensure that we are notified of any future action on this Project.

Sincerely,

Matthew Vespa
Senior Attorney

Encl.: The following references are included in the accompanying CD for your review and inclusion in the administrative record.

ENCLOSED REFERENCES

Exhibit A. BAAQMD, Greenhouse Gas Model User's Manual (April 2010)

Exhibit B. BAAQMD, CEQA Guidelines Updates, Proposed Thresholds of Significance (May 2010)

Exhibit C. CAPCOA, CEQA & Climate Change (2008)

Exhibit D. CAPCOA, *Quantifying Greenhouse Gas Mitigation Measures* (2010)

Exhibit E. Santa Barbara County Interim Procedures for Evaluating GHGs under CEQA (2010)

Exhibit F. Santa Barbara County, Support for use of BAAQMD Thresholds (2010)

Letter C
Matthew Vespa, Senior Attorney
Center for Biological Diversity (CBD)
February 28, 2011

Please see Chapter 2, of this Final EIR, for revised text related to the issue of GHG emissions.

Response to Comment C-1

The comment describes the organization and states that the members would be directly impacted by the Project. The responses to the other comments in the letter address the concern about impacts to members of the organization. This comment does not raise specific issues related to the adequacy of the Draft EIR and no response is necessary.

Response to Comment C-2

The comment states that, although mixed use redevelopment projects are considerably more GHG efficient than suburban sprawl, the analyses of GHG emissions and actions to reduce the emissions must be addressed. The comment claims that the analysis of the proposed project's greenhouse gas emissions was "improperly cut off" because this project is consistent with the General Plan. The comment claims that the "General Plan does not contain sufficient analysis to merit tiering" in accordance with the CEQA Guidelines. The following is the City's response.

The City Council approved the 2030 General Plan on March 3, 2009. As part of its action, the City Council certified the Master Environmental Impact Report (Master EIR) that evaluated the environmental effects of the development reasonably anticipated under the 2030 General Plan. Working with the State's Attorney General office, SMAQMD, and stakeholders, the City adopted a proactive and comprehensive approach to greenhouse gas emissions which affect climate change in the General Plan, as was evaluated in the Master EIR. As a certified environmental document, the Master EIR includes extensive analyses of the potential effects of GHG emissions due to development in the City.

The section of the CEQA Guidelines (Section 15064(h)(3) cited by the commentor is part of Article 5, 'Preliminary Review of Projects and Conduct of Initial Study'. Section 15064(h) addresses whether a cumulative effect requires an EIR. As noted on Page 7-6, fifth paragraph, of the Draft EIR, the project would not result in individually minor, but collectively significant project impacts related to air emissions. Therefore, the analysis complied with Section 15064(h)(3) in that the lead agency considered whether the effects of the project would be cumulatively considerable.

Section 15183.5 of the CEQA Guidelines, also cited in the comment, specifically addresses the tiering and streamlining of the analyses of GHG. The comment states that the General Plan does not contain sufficient analysis to merit tiering under this section. The comment is conclusionary and does not state how or why the cumulative analysis of GHG emissions in the Master EIR was insufficient for the proposed project and why the DEIR cannot be tiered from the GHG analysis in the Master EIR for the General Plan. Rather, Section 15183.5 of the CEQA Guidelines provides as follows:

> "Tiering and Streamlining the Analysis of Greenhouse Gas Emissions.
>
> (a) Lead agencies may analyze and mitigate the significant effects of greenhouse gas emissions at a programmatic level, such as in a general plan, a long range development plan, or a separate plan to reduce greenhouse gas emissions. Later project-specific environmental documents may tier from and/or incorporate by reference that existing programmatic

review. Project-specific environmental documents may rely on an EIR containing a programmatic analysis of greenhouse gas emissions as provided in section 15152 (tiering), 15167 (staged EIRs) 15168 (program EIRs), 15175-15179.5 (Master EIRs), 15182 (EIRs Prepared for Specific Plans), and 15183 (EIRs Prepared for General Plans, Community Plans, or Zoning)."

The cited Guidelines sections states that the significant effects of GHG can be analyzed and mitigated at a programmatic level, such as a general plan, and that project-level documents may tier from the programmatic review, which was done in the Draft EIR for the proposed project. The DEIR appropriately tiered from the MEIR because, in addition to citing the analysis from the MEIR, the Air Quality and GHG sections included project specific analysis before concluding that the project would not add impacts beyond those addressed in the MEIR. Additional language has been added to the FEIR for clarification of this issue.

See Chapter 2, of this Final EIR, for the revised text related to the issue of GHG emissions as they relate to the proposed project. For the convenience of the reader, the City revised the GHG discussion to include the relevant General Plan policies and implementation measures from Attachment 1 to the Mitigation Monitoring Plan for the 2030 General Plan that apply to the project. The City's General Plan and Master EIR are available at the City's website. These specific goals, policies, and programs targeting greenhouse gas emission reductions commit the City to comply with the Assembly Bill 32 (AB 32) reduction targets, preparation of a greenhouse gas emissions inventory for existing land uses and 2030 General Plan build-out, reductions in greenhouse gas emissions from new development, and adoption of a Climate Action Plan.

The 2030 General Plan and Master EIR recognized the unique aspects of the GHG problem. Because the actual effectiveness of all the feasible policies and programs included in the 2030 General Plan that avoid, minimize, or reduce greenhouse gases could not be quantified, the impact was identified in the Master EIR as a significant and unavoidable cumulative impact.

The proposed 700 Block of K Street project is consistent with the 2030 General Plan, and would further advance the City's efforts to promote infill development and strengthening of the urban environment. Buildings constructed as part of the project would be required to comply with current California building codes that enforce energy efficiency, including the recently enacted Green Building Code, which is part of Title 24 of the Building Code (CALGreen, the nation's first mandatory green building standards code).

As a certified EIR, the Master EIR includes a full analysis of greenhouse gas emissions and climate change impacts, and adequately addresses these issues through the adoption of mitigation measures and policies to reduce such impacts to the maximum extent feasible. The project is consistent with the City's goals and policies as set forth in the 2030 General Plan and Master EIR relating to reduction of greenhouse gas emissions. The project would not impede the City's efforts to comply with AB 32 requirements. The project would not have any significant additional environmental effects relating to greenhouse gas emissions or climate change that were not previously analyzed in the Master EIR.

Response to Comment C-3

The CBD requested that the project's greenhouse gas impacts be re-evaluated using the thresholds adopted by the Bay Area Air Quality Management District (BAAQMD) to determine the proposed project's greenhouse gas impacts and to use mitigation measures to reduce the project-level emissions to a less-than-significant level.

This requested approach is not consistent with current City policy, as established in the 2030 General Plan and associated Master EIR, or the CEQA Guidelines regarding approach to evaluating the emission of greenhouse gases from individual projects. See Response to Comment C-2.

In particular, the application of the thresholds that were derived for the Bay Area air basin to the project would be inappropriate for several reasons. First is that the BAAQMD has no jurisdiction over Sacramento County. The Sacramento Air Quality Management District (SMAQMD) is the local regulator of air quality for the Sacramento air basin. The Sacramento area has different geographical, climate, and air quality conditions than the Bay Area. Consistent with the SMAQMD *CEQA Guide* (2009), the threshold of significance used for the analysis of GHG emissions is whether the project's emissions would substantially hinder the State's ability to attain the goals indentified in AB 32[1]. In addition, the SMAQMD stated that, from the standpoint of CEQA, GHG impacts to global climate change are inherently cumulative;[2] and therefore, believes that GHG emissions are best analyzed and mitigated at the program level[3]. This approach is consistent with the CEQA Guidelines, Section 15183.5, as noted the Response to Comment C-2. The City complied with these requirements in the analyses and mitigation of GHG emissions in the 2030 General Plan and associated Master EIR.

The SMAQMD is currently working on the establishment of a threshold(s) for GHG emissions and anticipates such by the end of this year. If and when the SMAQMD changes its regulations and guidance, the City will comply as it evaluates subsequent development projects.

In addition, the City is currently working on developing its a Climate Action Plan (CAP). The CAP will include a GHG emission inventory, forecasts, and targets; expected impacts of climate change; and GHG emissions reduction and adaption policies and measures, which are expected to be consistent with the General Plan and Master EIR. The adoption of the CAP is anticipated in 2012.

The local air district and the City are in the process of developing a qualitative approach to the reduction of GHG emissions, as is requested by the commentor. The analysis and discussion of the emissions from the proposed 700 Block of K Street were based on the City's current approach and was properly tiered from the analysis and discussion in the Master EIR, in conformance with Section 15183.5 of the CEQA Guidelines, Tiering and Streamlining the Analysis of Greenhouse Gas Emissions. The City evaluated the significance of the proposed project's GHG impacts in accordance with the current City's policies related to such; and therefore, no revisions to the Draft EIR are necessary. In fact, another commentor (ECOS – See Letter D) on the proposed project stated that, "this project appears to be one of the lowest greenhouse gas (GHG) emitting projects per capita in the Sacramento region!".

Response to Comment C-4

The modeling results for the potential greenhouse gas emissions from mobile sources which may be emitted by the residents, employees and customers of the proposed project at the 700 Block of K Street were included in Appendix C of the Draft EIR. The URBEMIS model was used to determine the potential mobile source emissions resulting from the proposed project. Use of the URBEMIS model is sanctioned by the SMAQMD.

The City does not require applicants to model the entirety of a project's carbon footprint, which includes, in part, emissions from electricity, solid waste, and refrigerants. As stated in Responses to Comments C-2 and C-3, the City does not use a qualitative method to determine the potential impacts due to GHG emissions of individual projects, which approach is consistent with the CEQA Guidelines as noted above. For this reason, it is not necessary for the applicant to provide such calculations. Without a numeric threshold for an individual development project, a calculation of a project's entire carbon footprint has no meaning. The project proposes a mixed use development with residential, retail, and restaurant land uses. The project is located next to a light rail station and offers housing for employee working in the downtown area.

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[1] Sacramento Metropolitan Air Quality Management District, *CEQA Guide December 2009*, Page 6-10.
[2] Sacramento Metropolitan Air Quality Management District, *CEQA Guide December 2009*, Page 6-1.
[3] Sacramento Metropolitan Air Quality Management District, *CEQA Guide December 2009*, Page 6-2.

The City evaluated the significance of the proposed project's GHG impacts from mobile sources in accordance with the current City's practices, SMAQMD guidance and the CEQA Guidelines; therefore, no additional analysis is needed to be included in the Draft EIR.

Response to Comment C-5

This comment refers again to tiering of the DEIR from the Master EIR for the General Plan. See Responses to Comments C-2 and C-3. In addition, CEQA Statute Section 21157.1 states that when a lead agency prepares a Master EIR, evaluates the subsequent project by preparing an initial study and determines that no additional significant effects that were not identified in the Master EIR would occur, no further analysis for that potential impact is required. This statute provides that a subsequent project would undergo only limited review after a Master EIR is prepared and certified.

As noted on Page 1-1 of the Draft EIR, and in accordance with Section 15177 of the CEQA Guidelines, the analysis of the proposed project determined whether the project may cause any additional significant effects on the environment that were not previously examined in the Master EIR.

In addition, Section 15183.5 of the CEQA Guidelines allows lead agencies to analyze and mitigate the significant effects of GHG emissions at a programmatic level (as was done in the certified Master EIR for the 2030 General Plan) to analyze and mitigate greenhouse gas emissions. As shown in Chapter 2 of this Final EIR, the applicable mitigation measures for the reduction of GHG emissions, adopted as part of the Master EIR, from projects were included for this proposed project. Also as noted above, the Climate Action Plan will further refine the GHG emissions and implementation strategies for the General Plan policies, and there is nothing in current law that requires the CAP to be completed before development project may be approved in reliance on the Master EIR and CEQA's tiering provisions.

Therefore, the Draft and Final EIRs for the proposed project recognize the significance of the project's impacts from GHG emissions, based in part on the analysis in the Master EIR, and would impose the feasible mitigation measures from the Master EIR to reduce the project's emissions, as set out in the Mitigation Monitoring Plan related to policies and implementation measures that mitigate climate change impacts. For these reasons, no revisions to the Draft EIR are necessary.

Response to Comment C-6

See Response to Comment C-3.

The commentor states that the City should adopt a 1,110 MT CO_2e per year threshold to determine a project's GHG emissions impact in reliance on the threshold established by the BAAQMD, and claims that this Bay Area threshold can be used by the City because the data is "roughly analogous to that of Sacramento". No explanation was given by the CBD as to why the data for the two air basins is "roughly analogous," although the comment acknowledges that the threshold is based on Bay Area specific data. Appendix D of the BAAQMD *CEQA Guidelines* (June 2010) contains the justification for the establishment of the 1,110 MT threshold of significance. As noted in Steps 4 through 7 (Page D-15), specific land uses in the San Francisco Bay Area Air Basin were used, in part, to determine the threshold.

As previously noted, the analysis of the potential GHG emissions for this proposed project was in accordance with the SMAQMD's regulations and guidance, the City's current policy, the Master EIR and the available information regarding the issue. For these reasons, no revisions to the Draft EIR are necessary.

Response to Comment C-7

See Responses to Comments C-2 through C-4.

The project would be required to comply with the Title 24 requirements in effect at the time the building permits are applied for. The project will be required to comply with the recently enacted Green Building Code, which is part of Title 24 of the Building Code (CALGreen, the nation's first mandatory green building standards code). In addition, the project includes low-flow toilets, a parking waiver to allow approximately 84 parking spaces for approximately 137 units, and the project includes at least one green roof top garden.

As previously noted, the project's GHG analysis is consistent with the SMAQMD's regulations and guidance, and the City's current policy which requires the project to comply with the mitigation measures adopted as part of the Master EIR and the General Plan policies related to GHG. Also, it should be noted that the applicant has voluntarily agreed to implement most of the measures noted in the comment.

For these reasons, no revisions to the Draft EIR are necessary.

Response to Comment C-8

Section 15088.5, Recirculation of an EIR prior to Certification, of the CEQA Guidelines addresses the circumstances when a draft EIR must be recirculated. None of those conditions are applicable to the Draft EIR, the additional information included in the Final EIR, or the scope and impacts of the proposed project.

The comment states that the Draft EIR for the project must be recirculated in order to address the project's impacts from greenhouse gas. The City disagrees with this comment. As previously noted, tiering from the Master EIR for the General Plan is the appropriate means of addressing GHG impacts of a subsequent project, and the additional information that is to be added to the Draft EIR clarifies and amplifies the discussion of the GHG emissions and mitigation measures and policies from the Master EIR and General Plan. Section 15088.5(b) states that recirculation is required only when significant new information added to the EIR changes it in a way that "deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of a project or a feasible way to mitigate or avoid such an effect..." The additional information from the Master EIR and General Plan that is to be included in the Draft EIR is not new information, and CBD and others have already had the opportunity to comment on the project's GHG impacts, mitigation measures, and the tiered analysis from the Master EIR. Since it merely clarifies or amplifies the information contained in an adequate EIR, which was properly tiered from the Master EIR, recirculation per Section 150688.5 is not required.

The comment repeats the claim that the GHG analysis was inadequate. As previously noted, the analysis of the potential GHG emissions for this proposed project was in accordance with SMAQMD's regulations and guidance, e the City's current policy, which requires the project to comply with the mitigation measures adopted as part of the Master EIR and the General Plan policies related to GHG. For these reasons, no revisions to the Draft EIR are necessary and the City disagrees with the statement that the GHG impacts were not adequately analyzed in the Draft EIR.

Enclosed References

The CBD attached six documents for reference. Because the documents were submitted for the City's review and inclusion in the administrative record, no responses are necessary. The references are guides prepared by other agencies, BAAQMD, CAPCOA, and County of Santa Barbara for the analysis of climate change in accordance with CEQA.

Letter D

ECOS
ENVIRONMENTAL COUNCIL OF SACRAMENTO

Post Office Box 1526 • Sacramento, CA • 95812 • (916) 444-0022

Via Electronic Mail

24 March 2011

Jennifer Hageman, Senior Planner
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Shelly Amrhein
Sacramento Housing & Redevelopment Agency
801 12th Street
Sacramento, CA 95814
Email: *ramrhein@shra.org*

Re: Comments on 7th and K Street Block Draft Environmental Impact Report

Ms. Hageman and Ms. Amrhein,

These comments are submitted on behalf of the Environmental Council of Sacramento (ECOS) on the 7th and K Street Block Project (Project) Draft Environmental Impact Report (DEIR). ECOS is a coalition of environmental and civic organizations with a combined membership of more than 12,000 citizens throughout the Sacramento Region. Our mission is to achieve regional and community sustainability and a healthy environment for existing and future residents. D-1

ECOS supports infill development and is therefore very supportive of the Project. The proposed roof top garden, reuse of existing buildings, great mix of street level business and mid-level residences will help revitalize the blighted area and assist in bringing the downtown to life! Although not well analyzed (which is required by CEQA), this project appears to be one of the lowest greenhouse gas (GHG) emitting projects per capita in the Sacramento region! D-2

Congratulations are due to the project proponents!

Addressing climate change in EIR documents is a nascent process that is rapidly evolving. Because of the newness and due to City staff cutbacks, the City has not been able to develop the tools necessary to clarify the process for project proponents and thus confusing and inaccurate EIR documents are prepared for D-3

the City's use (e.g. North West Land Park DEIR (see ECOS comments dated February 17, 2011) and this DEIR). Several of ECOS comments, if implemented, could improve clarity of this **and future** EIR's. Some of these global comments are:

- The City needs to address the conflict that exists between the General Plan Update (GPU) estimate of greenhouse gas (GHG) emissions in 2030 and Sustainability Master Plan's (SMP) 2020 and 2050 GHG targets
  - GPU is also internally inconsistent with policy ER-6.1.3
- Adopt BAAQMD screening criteria (interim)
- Adopt BAAQMD GHG threshold of 4.6 MT/yr-sp (interim)
- Work with SMAQMD and other local jurisdictions to develop a regional GHG threshold (permanent)
- Develop a Frequently Asked Questions fact sheet (or flow chart) regarding GHG requirements for projects (see Attachment D)
- Develop a Best Management Practices (BMP) requirements sheet for small (de minimis) projects (see Attachment E)
- Consider requiring projects to self-certify how well they comply with Greenwise Initiative Objectives, Strategies and Actions (see Attachment F)
- The City has not apparently attempted to optimize the life cycle cost of water, sewer and storm systems. Infrastructure and efficiency should be evaluated using integrated resource planning concepts

In addition, since this project seems to meet the BAAQMD GHG threshold, consider developing a voluntary Tier 1 "stretch" threshold and use Mayor Kevin Johnson's Greenwise investment concept to encourage this project to "stretch" beyond the mandatory 4.6 threshold, which in turn will minimize "lost opportunities"[1]. D-4

In addition to the Greenwise Initiative's innovative financing strategies that help make energy efficiency improvements a non-budget issue to project proponents, design features and ECOS recommendations combine to **achieve over 5-dozen** Objectives, Strategies and Actions from the Mayor's Plan! See Attachment F.

Beyond the global comments summarized above, ECOS' main concern on this Project deals with the DEIR's treatment of climate change. Our major comments are summarized as follows:

- DEIR improperly uses GPU as a programmatic document to state that GHG mitigation and enforcement is not required D-5
- GHG analysis is not provided

The comments summarized above are more fully addressed in Attachment A.

[1] A lost opportunity is a greenhouse gas mitigation measure that is cost effective when installed as part of new construction, but prohibitively expensive when considered as a retrofit measure.

In closing, ECOS does appreciate the opportunity to comment on the Draft Environmental Impact Report for the 7th and K Street Block Project. To reiterate, ECOS supports infill development and is **very** supportive of this project. Our goal is to ensure that this **and future** projects effects upon climate change are well-addressed, properly mitigated in EIR documents and subsequent construction. D-6

With the incorporation of the design recommendations made by SABA (DEIR page 2-3) and addressing numerous deficiencies that we have identified concerning climate change in this document, this could not only be an exemplary infill project, but it could be a State gem! If you would like to meet with ECOS representatives responsible for these comments, please contact Keith Roberts keitheroberts@aol.com . D-7

Yours very truly,

/s/ Jonathan Ellison

Jonathan Ellison, President
Board of Directors

Attachment A- Global and Project Recommendations
Attachment B- BAAQMD Case Studies
Attachment C- 7th and K Measurable and Enforceable Climate Action Plan (concept)
Attachment D- FAQ: How To Address Climate Change In Development Projects (concept)
Attachment E- Best Management Practices for Small Projects (concept)
Attachment F- Consistent with Greenwise Initiative Goals

Letter D
Jonathan Ellison, President, Board of Directors
Environmental Council of Sacramento (ECOS)
March 24, 2011

Please see Chapter 2, of this Final EIR, for revised text related to the issue of GHG emissions.

Response to Comment D-1

The comment describes the organization. This comment does not raise specific issues related to the adequacy of the Draft EIR and no response is necessary.

Response to Comment D-2

ECOS states that they support this infill project and states that the project design appears to result in one of the lowest greenhouse gas emitting projects per capita in the region. This comment does not raise specific issues related to the adequacy of the Draft EIR and no response is necessary; however, responses to subsequent comments address the stated concern about the analysis of GHG emissions.

Response to Comment D-3

See also Response to Comment C-2.

ECOS stated that the City should also look at the comments they sent on another proposed project in the City, Northwest Land Park. Their comments on that project will be addressed in the Final EIR for that project. It is beyond the scope of this Final EIR to incorporate comments on another project. The responses below are for the comments from ECOS sent on the analyses for the proposed project at the 700 Block of K Street.

The City disagrees with the statement that we have not developed a process for project applicants that provides clear guidance for the analyses of greenhouse gas emissions. The certified Master EIR for the 2030 General Plan included extensive discussions and analyses of the GHG issue, requirements and policies and was created, in part, with input from stakeholders such as ECOS. Mitigation measures and General Plan policies were included in the Master EIR and General Plan that were designed to reduce GHG emissions, both from individual development projects and from the operations of the City. EIRS for subsequent development projects within the scope of the Master EIR for the General Plan base their analyses on the GHG analysis and mitigation measures in the Master EIR and the GHG policies in the General Plan.

ECOS provides what they refer to as "global comments" regarding GHG and air quality emissions for the proposed project and future EIRs. The comments regarding providing further clarity will be passed on to City staff working on implementation of the referenced plans[4]. These comments do not raise specific issues related to the adequacy of the Draft EIR analysis for the project, but responses are provided for informational purposes.

- Address the conflict between the 2030 General Plan and the 2020 Sustainability Master Plan and the 2050 GHG targets. The comment was not specific as to the conflict, which may be due to the different build-out/target dates.

[4] ECOS will have the opportunity to review and comment on the draft Climate Action Plan.

- Adopt BAAQMD thresholds and screening criteria on an interim basis. BAAQMD regulations apply to their area of jurisdiction, the Bay Area. The City must comply with the SMAQMD thresholds and screening criteria applicable at the time of EIR preparation. See also Responses to Comments C-3 and C-6.

- Work with SMAQMD and other local jurisdictions to development a regional GHG threshold. The District is currently working on the development of a threshold(s) related to GHG emissions. The District indicated on April 6, 2011 that they anticipate development of a threshold by the end of the year. The City meets at least once a quarter with the District to provide input to the District and keep up-to-date with policies in development. In addition, the City provides comments on draft documents circulated by the SMAQMD and the District comments on the City's EIRs.

- Develop a FAQ fact sheet regarding GHG requirements for projects. This idea that will be passed on to the City's Climate Action Plan staff.

- Develop BMPs for small projects. This idea will be passed on to the City's Climate Action Plan staff.

- Require applicants to self-certify their project's compliance with the Greenwise Initiative Objectives. This idea will be passed on to the City's Climate Action Plan staff.

- Optimize the life cycle costs of the City's public utility systems. This idea will be passed on to the City's Climate Action Plan staff.

Response to Comment D-4

See Response to Comment C-3.

Because the proposed project (1) was determined to be consistent with the City's General Plan, (2) tiered the analyses from the Master EIR for the General Plan, (3) does not propose land uses that would result in a greater level of GHG emissions than previously assumed for the project site in the General Plan, and (4) would comply with the General Plan policies and mitigation monitoring plan for climate change, there is not a City policy to require the project to exceed the current requirements from the Master EIR and the General Plan. The suggestions made by ECOS for the project to meet a greater reduction in greenhouse gas emissions will be passed on to the applicant for their consideration.

Response to Comment D-5

See Responses to Comments C-2 and C-5.

Response to Comment D-6

The comment expresses its support for the proposed project. This comment does not raise specific issues related to the adequacy of the Draft EIR and no response is necessary.

Response to Comment D-7

Please see the City's responses to the design recommendations in the SABA letter on Page 7-47 of the Draft EIR.

See Responses to Comments D-1 through D-5.

Attachment A

The attachment reiterates and expands upon comments made in the letter from ECOS. See Responses to Comments D-1 through D-5.

Attachment B

Several projects within the BAAQMD area are discussed, indicating their projected emissions, and methods to reduce the emissions. This comment does not raise specific issues related to the adequacy of the Draft EIR and no response is necessary.

Attachment C

This attachment is a conceptual climate action mitigation plan supplement apparently prepared by ECOS.

Attachment D

The attachment provides a conceptual plan for addressing climate change as it relates to individual development projects. The plan is based on the BAAQMD Guidelines, which have not been adopted by SMAQMD. See also Responses to Comments C-3 and C-6.

Attachment E

The attachment provides a concept plan for best management practices for the reduction of GHG emissions for a small project. The attachment appears incomplete.

Attachment F

As noted in previous responses, the City based the analysis and discussion of the potential GHG emissions from the proposed project in accordance with the current approach and methodology used by the City and based on SMAQMD thresholds and screening criteria applicable at the time of EIR preparation. The project complies with the applicable 2030 General Plan policies and implementation programs that reduce the City's cumulative contribution to GHG emissions which cause climate change[5] (see Page 2-3 of this Final EIR).

ECOS suggested that the applicant use the strategies from the Greenwise Initiative as the source for additional GHG reduction measures. The proposed project's consistency with the Greenwise Initiative goals was determined by ECOS. ECOS also stated that incorporating the energy efficiency improvements in the Initiative, combined with ECOS recommendations based on its comparative analysis, would achieve a number of objectives and actions from the Initiative. The Greenwise Initiative has not been adopted by the City Council and; therefore, the project is not required to comply with the additional measures identified by ECOS. However, ECOS' suggestions have been conveyed to both the applicant and City staff working on the Climate Action Plan for their consideration.

[5] See Attachment 1 to the Mitigation Monitoring Plan in Chapter 5 of the 2030 General Plan in the Master EIR.

ATTACHMENT A- Global and Project Recommendations

I. Two Official City Documents Conflict and GPU is Internally Inconsistent

A. General Plan Update (GPU) and Sustainability Master Plan (SMP) Conflict

The GPU, approved by City Council in March 2009 states that GHG emissions in the City will INCREASE by 49% to 7.57 million tons per year by 2030[1] (6.87 million metric tons per year or 20,737 US tons/day) relative to 2005 base year.

The SMP, approved by City Council in December 2007 states:

- that the City GHG emissions will DECREASE by 15% to 3.9 million metric tons per year by 2020[2]
- that the City GHG emissions will DECREASE by 80% to 790,000 metric tons per year by 2050 to meet its share of SACOG emissions reductions

The projected GPU increase and required SMP decrease in emissions clearly conflict. Additionally, it should be noted that the SMP's 2020 and 2050 targets are based on science, are similar to other's jurisdictional long-term targets, and that substantial evidence exists to justify the targets.

Addressing this inconsistency will reduce confusion of EIR preparers and clarify this **and future** EIR's.

B. GPU Internal Inconsistency

GPU MEIR Appendix K states:

> ER 6.1.3 Greenhouse Gas Reduction Goal. The City shall work with the California Air Resources Board to comply with statewide greenhouse gas reduction goals as established in the Global Warming Solutions Act of 2006 (AB32) for 2020 and any subsequent targets. (RDR)

The GPU, Table 8.3 states that GHG emissions in 2030 will be 20,737 tons/day (or 7.57 million tons per year or 6.87 million metric tons per year).

The GPU Table 8.3 and Appendix K are internally inconsistent.

- Table 8.3 indicates that GHG emissions will increase from 4.6 million metric tons per year in 2005 (Jones and Stokes Study, Feb 2009) to 6.87 million metric tons per year in 2030- a 49% INCREASE
- Appendix K calls for a 15% DECREASE from 2005 emission levels by 2020

C. Consistency With State Law

[1] GPU MEIR, Table 8-3
[2] Sustainability Master Plan, December 2007

The SMP and the GPU's policy ER 6.1.3 are both consistent with AB32 and should be used as a basis for all GHG analyses.

The GPU GHG analysis is inconsistent with AB32 and should not be used for any type of GHG analyses or as a programmatic EIR for GHG mitigation.

II. Improper Use of GPU as a Programmatic Mitigation Document

A discussion of greenhouse gases (GHG) and analyses performed under the General Plan Update (GPU) MEIR takes place beginning on page 7-6. The discussion indicates that GHG mitigation is not necessary because the project is consistent with the GPU GHG projections.

- There are only specific instances where a DEIR can use a programmatic document (GPU) to determine that a GHG impact is less than significant and that mitigation is not required. The criteria are outlined in the new CEQA Guideline 15183.5 and 15064(h)(3). The programmatic document must show that it (GPU or CAP) actually has specific and enforceable measures in place that reach the City's GHG goal and that the goal is sufficient based on substantial evidence, to render impacts less than significant.

The 2009 GPU does not meet these criteria so the DEIR can't say that the GPU nullifies the need to adopt GHG mitigation for the Project.

The City is currently developing a climate action plan (CAP) that is intended to amend the GPU to some extent so that it can serve as a programmatic document for development projects. Until the CAP is complete, City projects must mitigate GHG emissions on a project-by-project basis.

By developing a FAQ fact sheet (see Attachment D) this inconsistency seen in the last 2 EIR's (also NW Land Park) will no longer confuse EIR preparers and this and **future EIR's** will be much clearer.

III. GHG Significance Threshold Is Not Identified

The City has not adopted a GHG threshold of significance, which is typical throughout the State; this does not mean that there is no reasonable way to determine significance, or to determine a project's "fair share" of emissions reductions.

By adopting a significance threshold, the City would be informing, and minimizing confusion of, project proponents of the City's requirements and improve clarity of this **and future** EIR's.

CEQA Guidelines include:

- The GHG emissions from the Project are individually limited, but cumulatively considerable and therefore have a significant effect on the environment. (State CEQA Guidelines, § 21083(b).)
- A cumulatively considerable impact can be made less than significant if a project implements or funds a fair share of applicable mitigation measures. (State CEQA Guidelines, § 15130(a)(3).)
- For CEQA purposes, a significance threshold identifies a level below which an environmental impact will normally be less than significant. (State CEQA Guidelines, § 15064.7(a).)

The above infers that the Project GHG emissions would be less than significant if the Project were to meet a significance threshold that is based on achieving a "fair share" of the necessary GHG reductions required to stabilize the Earth's climate.

A. Fair Share GHG Significance Threshold

Many air districts are attempting to develop GHG thresholds for new development, although no air district has suggested that development projects meet their "fair share" of GHG emissions reductions as is required by CEQA.

ECOS has used Statewide estimates of population to determine a projects "fair share" emissions rate within the State. The following table identifies the results:

Year Building Permit Issued	Fair Share Emissions Threshold (MT/yr-sp)
2011	2.5
2015	2.2
2020	1.9
2025	1.5
2030	1.2
2040	0.8
2050	0.7

The above table is based upon:

- Statewide service populations for 2020 and 2050
- Statewide emissions targets for 2020 and 2050 (based on AB32's 2020 target and S 3-05's and Sustainability Master Plan's 2050 target)
- Average 50 year building life
- Weighted average of service personnel metric over the buildings life time

See EXAMPLE CALCULATIONS, below.

ECOS has used a 50-year building life in the analysis because although it may be reasonable to use 2020 GHG targets for short-lived GHG emitters such as cars (e.g. +/- 10 year life), long-term 2050 targets must be considered in any analysis when long-lived GHG emitters such as buildings and land use (e.g. 50+ year life) are considered.

- **<u>In other words, TODAY's land-use decisions WILL affect emissions in 2050.</u>**

There may be other scientific methods for calculating a projects "fair share" emissions, however ECOS has seen no other method proposed. Any other scientifically reasonable method will likely yield similar results.

EXAMPLE CALCULATIONS:

1. Allowable emissions rate for 2020 (one year only)

   4.6 MT/yr-sp = (295.5 million metric tons/yr)/(64.3 million service personnel)[3]

   where:
   - 295.5 million metric tons/yr are allowable land-use related GHG emissions for 2020 (i.e. 1990 emissions)
   - 64.3 million service personnel forecast for 2020 (44.1 million residents and 20.2 million workers)

2. Allowable emissions rate for 2050 (one year only)

   0.7 MT/yr-sp = (59.1 million metric tons/yr)/(80.1 million service personnel)

   where:
   - 59.1 million metric tons/yr are allowable land-use related GHG emissions for 2050 (i.e. 1990 emissions – 80%)
   - 80.1 million service personnel forecast for 2050 (extrapolated by ECOS)

3. Allowable emissions rate for building permitted in 2020 (50 year average)

   1.9 MT/yr-sp = {30 years*[1/2(4.6+0.7)] + 20 years*[0.7]} / (50 years)

   where:
   - Building will emit GHG's from 2020 through 2069
   - From 2020 through 2049, annual rate will drop from 4.6 to 0.7
   - From 2050 to 2069, annual rate will remain constant at 0.7

B. Bay Area Air Quality Management District Significance Threshold

The Bay Area Air Quality Management District (BAAQMD) recently adopted a 4.6 MT/yr-sp significance threshold using the 2020 targets and service population (see calculation A.1 above). Note that this threshold is 80% higher than the 2.5 MT/yr-sp "fair share" threshold identified for projects permitted in 2011!

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[3] BAAQMD, California Environmental Quality Act, Air Quality Guidelines, (June 2010); Table D-7

The adopted threshold, which does not achieve a "fair share" emissions reduction, was a hard fought compromise settled upon by a diverse pool of stakeholders. ECOS believes that implementing a "fair share" emissions threshold would be politically impossible to achieve at this point in time.

- Following sections suggests that a voluntary "stretch" threshold (with incentive mechanism) be developed to encourage projects to reach towards meeting a "fair share" emissions rate.

Also, the BAAQMD has found that:

- well-designed infill projects comply with the basic 4.6 threshold with little to no effort and
- that suburban sprawling projects have great difficulty in complying without the use of off-site mitigation

See Attachment B for examples.

C. 7th and K Street Block Plan Emissions

Based on the following assumptions[4] this project will emit 4.4 MT/yr-sp, which WOULD satisfy the BAAQMD significance threshold if it were in place in Sacramento! Where:

4.4 MT/yr-sp = 2,165 metric tons/year / (306 residents + 182 workers)

- 2,165 metric tons/yr (page 7-7 of DEIR)
- 306 residents (153 du at 2.0 residents per du)
- 182 workers (63,780 SF / 350 SF per worker)

If all assumptions are correct this project would NOT require any GHG mitigation including measures that are typically always cost effective such has:

- Beating Title 24 energy code by 15 to 20%[5]
  - Page 7-7 of DEIR indicated that construction would meet State energy code, but ECOS found nothing in the DEIR suggesting that the Project was attempting to improve upon code energy requirements, yet the PG&E document suggests that cost effectiveness would be reasonable for this type of new construction
  - Analysis of beating Title 24 energy code needs to be done
- Allowing fewer car spaces than code requires, this measure could and should be linked to implementing other non-auto, transportation friendly GHG mitigation measures such as:
  - Unbundling of apartment rents and car space rents (SABA request)
  - Provide community car share vehicles

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[4] GHG analysis is not documented in DEIR

[5] PG&E Codes and Standards; Title 24 Energy-Efficient Local Ordinances; Title: Climate Zone 12 Energy Cost-Effectiveness Study (SMUD Electricity & PG&E Gas Rates); Feb 7, 2011

- Provide community NEV's (for short trips)
- Provide community bicycles for residents
- Provide bike locker room for residents

Many GHG mitigation measures are low cost when installed as new construction, but prohibitively expensive when considered as retrofit measures. These types of measures are known as "lost opportunities". Beating Title 24 by 15 to 20% would be considered a lost opportunity, if not included.

There is a dilemma! The Project apparently complies with a reasonable GHG threshold, yet cost effective "lost opportunities" will exist. What can be done?

- **Consider a voluntary Tier 1 GHG significance threshold**

D. Voluntary Tier 1 GHG Significance Threshold

The California Green Code[6] was recently adopted by the State. The Green Code contains mandatory measures that are required of all new construction within the State and also contains voluntary "stretch" goals known as Tier 1 and Tier 2 standards.

The climate crisis demands that all feasible action be taken to reduce greenhouse gas impacts from all project types, yet:

- BAAQMD experience indicates that:
  - sprawling suburban projects have a difficult time meeting the basic threshold of 4.6 MT/yr-sp;
  - well designed infill projects seem to meet the basic threshold with little trouble;
- this Project which is well designed should not be asked to perform better than a poorly designed project, unless it is incentivized to do so;
- "lost opportunity" GHG mitigation measures should be minimized and;
- effort should be made to cost effectively reach towards meeting a "fair share" emissions rate.

As part of **Mayor Kevin Johnson's Greenwise Initiative**, the concept of developing a program whereby local residents and businesses could invest in local, cost effective energy efficiency projects through an investment program was recommended[7].

The combination of these events leads ECOS to suggest that the City develop a voluntary Tier 1 significance threshold and that projects that attempt to reach Tier 1 be allowed to use Greenwise investment funds.

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[6] California Building Standards Commission; www.bsc.ca.gov

[7] PACE type financing might also meet this need if implementation problems are solved

The Greenwise Investment Pool (GIP) could operate similar to the SMUD Solar Shares program. Property owners would be given first right of refusal to pay an extra $1,000[8] for their home or they could agree to pay a fixed monthly fee of $10.12 for 10 years (3% APR dividend for GIP shareholders and 1% admin fee[9]). If average monthly utility savings is less than $10.12, then loan term could be set for 15 ($7.40/ month) or 20 years ($6.06/ month) so that cash flow would always remain positive. The fee would be shown as a surcharge on SMUD (and/or PG&E) bills (and the estimated dollar savings could be shown as a credit). The project proponents could be given second right of refusal to be shareholders. GIP shareholders would be default investors. All appropriate utility incentives and tax credits would be used to reduce capital cost of the efficiency.

- If an investment pool can't be formed in the necessary time frame, perhaps SMUD or the City has some unexpended ARRA funds from the Community Block Grant Program that could be used to invest in this pilot project and test some of the tenets of the proposed investment pool.
- If SMUD (and/or PG&E) were the sole shareholder(s), this would be known as "on-bill financing"

Advantages that project proponents would get out of this process are:

- public relation kudos for allowing the City to implement an innovative program to reduce carbon
- additional kudos for green job growth
- no up front capital cost increases
- reasonable construction overhead and profit on added efficiency
- second right of refusal to become shareholders

In addition, the CARB Cap and Trade program (not available until 2012) and SMAQMD Indirect Source Rule program (currently on hold) should be reviewed to determine if investment in projects that strive to meet "stretch" goals is appropriate.

E. Recommend City Adopt Mandatory Basic and Voluntary Tier 1 Significance Thresholds

To provide guidance, reduce confusion amongst EIR preparers, improve clarity of this **and future** EIR's and to achieve parity with other jurisdictions in the State (e.g. Bay Area, Santa Barbara), ECOS recommends that the City as quickly as possible:

- adopt an interim mandatory basic GHG significance threshold, and furthermore ECOS suggests that the BAAQMD per service personnel metric of 4.6 be adopted as a minimum
- adopt a voluntary "stretch" Tier 1 significance threshold of [4.0][10] MT/yr-sp

[8] $1,000 is an example; the 10, 15 and 20 year repayment amounts are correct for $1,000 expense at 4% APR
[9] actual dividend and admin percentage rates are to be determined
[10] to be determined

Without guidance from the City, confusion will continue as is evidenced by this DEIR and by the NW Land Park DEIR; (see ECOS comment letter of February 17, 2011) and climate change mitigation will continue to be inadequately addressed in City EIR's. This is not "Bringing The Customer To Success".

The Sacramento Metropolitan Air Quality Management District (SMAQMD) is beginning the process of developing a significance threshold for use in its district. ECOS recommends that the City work with the SMAQMD and other local jurisdictions to develop a permanent regional GHG significance threshold.

IV. Screening Criteria

Screening criteria is used by lead agencies to determine whether a particular project emits a sufficient quantity of pollution to warrant evaluation in an EIR. Screening criteria is generally selected by a lead agency to assure that 75% of emissions of a particular pollutant released to the atmosphere by a sequence of new projects are evaluated in EIRs.

The City has not adopted screening criteria for GHG. By adopting screening criteria, the City would be informing, and minimizing confusion of, project proponents of the City's requirements and improve clarity of this **and future** EIR's.

Table 3-1[11] suggests that the Project is roughly 3 times larger than the minimum criteria and thus should require a GHG analysis in the EIR.

V. Other Potential Clarifying Documents

A. Frequently Asked Questions (or Flow Chart)

It may be possible to reduce the confusion of project proponents if the City were to develop a Frequently Asked Questions fact sheet (or flow chart).

- See Attachment D for a concept FAQ fact sheet

B. Small Project Best Management Practices Requirements

If the City does adopt screening criteria for GHG, it may be reasonable to require exempt (de minimis) projects to proscriptively mitigate for GHG. Mitigation proscriptions could be provided in a checklist of requirements that must be implemented.

- See Attachment E for a concept requirements list

C. Consistent with Greenwise Initiative and Sustainability Master Plan Goals

[11] BAAQMD, California Environmental Quality Act, Air Quality Guidelines, (June 2010);

In May 2010, Mayor Kevin Johnson introduced the Sacramento region to the Greenwise Initiative, an effort to move not only the City, but the region, towards the vision of an Emerald Valley where green jobs would be created, the environment would be protected and citizens would be engaged to work towards achieving a sustainable life style.

To provide better connectivity between the City's aspirational goals and day-to-day business operations, it might be reasonable to request project proponents to self-certify how well their project meets City sustainability goals.

ECOS compared the Project as designed with ECOS recommendations implemented and found that the Project achieves **well over 5 dozen of the Objectives, Strategies and Actions (OS&A) identified in the Greenwise Initiative Regional Action Plan!**

Some of these OS&A's include:

- Innovative Financing to Improve Energy Efficiency
- Increase Green Jobs
- Invest in Sacramento's Green Economy
- Reduce Water Consumption by 20%
- Reduce Energy Consumption by 15%

For a more complete view of the Project's potential accomplishments with respect to the Mayor's Plan, see Attachment F.

The Project with ECOS recommendations also compared favorably to the Greenwise Initiative's predecessor - the Sustainability Master Plan.

VI. The DEIR's Analysis of Impacts from the Project's Greenhouse Gas Emissions is Inadequate

CEQA requires a "good faith effort at full disclosure." Guideline § 15151. The DEIR claims that Project emissions are 2,165 metric tons. However, the brevity of the discussion makes it unclear if this is attributable only to mobile source emissions or the entirety of the Project's carbon footprint, including emissions from electricity and natural gas, water consumption, solid waste, and refrigerants.

Modeling is readily available to provide data on emissions from these sources. (See, e.g., SCAQMD, CalEEMod (February 2011); BAAQMD, Greenhouse Gas Model User's Manual (April 2010); CAPCOA, CEQA & Climate Change (2008).)

To comply with CEQA's informational requirements, please provide additional analysis on the greenhouse gas emissions resulting from the Project.

A. The DEIR Fails to Adequately Mitigate Project Impacts

Once the Project's greenhouse gas impacts are properly quantified and analyzed, the DEIR should consider adoption of specific measures to reduce emissions.

Recommended Guidelines: CAPCOA recently issued *Quantifying Greenhouse Gas Mitigation Measures* (Aug. 2010). This important document offers specific guidance on potential GHG mitigation and how GHG reductions from adopting this mitigation would be quantified. Please review these measures and adopt all feasible mitigation set forth in the CAPCOA document. If a measure is rejected as infeasible, please explain the basis for rejecting that measure. Adoption of measures in the CAPCOA Mitigation report can provide an informative route to reducing per capita emissions from the Project to 4.6 MT and below.

Other Sources of Guidance: In new and emerging processes such as the CEQA treatment of GHG emissions and climate change impacts, it is frequently of value to review the actions of others and incorporate the positive aspects of their findings. Attachment B is a case study that the BAAQMD performed in support of its effort to develop a GHG threshold. The case study reviews the design features of a selection of Bay Area projects and estimates the threshold with and without the added design features. Some of the common threads that run throughout the case study are:

a. Beat Title 24 by 20%
b. Drought tolerant landscaping
c. Low flush toilets and fixtures
d. Reduce solid waste by 10%
e. Solid waste energy recovery at landfill
f. Solar hot water or electric
g. Various transit demand management features

Attachment C was first submitted to Sacramento County as a concept/example of an effective, measurable and enforceable climate action mitigation plan (CAMP) in January 2010 for the Florin-Vineyard Gap (FVG) DEIR; again in October 2010 for the FVG FEIR; and again in February 2011 for NW Land Park DEIR. The CAMP has been slightly modified to meet the design aspects of the Project. The CAMP although similar to a few other measurable lists has two innovations that attempt to make it more effective than other lists:

- Market Transformation: The CAMP rewards project proponents that implement market transforming GHG reducing measures
- Rewards Local Governments: Local governments are increasingly implementing policies and ordinances that reduce GHG emissions within their communities; the CAMP rewards project proponents that develop projects in jurisdictions that have implemented specific GHG reduction policies and ordinances; this in turn allows the City to "Bring The Customer To Success".

Similar to LEED, both market transforming project measures and state-of-the-art ordinances and policies should be periodically updated.

B. The DEIR Skirts its Obligation to Adopt Effective Mitigation for Project Greenhouse Gas Impacts

The DEIR's improper analysis that led to the flawed conclusion that GHG mitigation is not required amounts to an improper end-run around CEQA's requirement to adopt all feasible mitigation and alternatives. As a result, the DEIR fails to adopt meaningful measures that would reduce Project impacts, including improved efficiency, reduced solid waste, improved transit options and increased use of on-site renewable energy.

VII. Economics of Water Supply and Demand Is Not Evaluated

Few sectors attempt to optimize costs between supply and demand of a commodity, however for over 20 years the electricity and natural gas energy sectors have attempted to optimize and integrate the overall economics of supply and demand of their commodity. This process is known as integrated resource planning (IRP). There are many reasons for IRP such as:

- Energy utilities are generally for-profit and try to minimize overall costs[12];
- Supporting infrastructure is very expensive, especially electricity
    - so is sewer (and probably potable water);
- To reduce environmental impacts;

but the overriding goal is to reduce overall costs to the consumer. Optimizing the end use of a commodity is frequently called demand side management or DSM.

On a smaller scale, UC Davis - in many respects a small city - owns both supply infrastructure and demand resources (i.e. buildings). UC Davis has understood since the early 1990's that **making its buildings more resource efficient** through DSM **is frequently far less expensive** than building the supply infrastructure to support inefficient buildings (i.e. code compliant buildings do not necessarily minimize overall capital costs). **In addition, DSM reduces long-term operating costs!** Since the mid-1990's other UC and CSU campuses, as well as other Universities, have adopted the UC Davis life cycle costing concept.

- The analogy becomes a bit more tenuous when the City owns the supply infrastructure and the citizens of the City own the buildings, however if one assumes that the City exists to serve its citizens, the analogy is identical to the UC Davis example.
- UC Davis found that it was sometimes spending as much as $3 to $5 per unit of infrastructure, when $1 per unit in building side DSM would have permanently eliminated the need for the unit of infrastructure.
    - Does the City and Regional Waste Water Treatment Plant unknowingly subsidize building project infrastructure?

[12] Investor owned utilities such as PG&E have greater reason to implement DSM than municipally owned utilities such as SMUD, however DSM is a valuable tool to all electric utilities.

- In other words, meeting code is not necessarily the best long-term, cost-effective solution for the community.

Demand side management (DSM) by the water, sewer and storm purveyor (City) is not well documented in the DEIR. The Project does include a roof top garden which is a **wonderful** storm water management measure, the City does reduce storm water impact fees for projects that use low impact storm water management, and the City does have a small water efficiency improvement office, yet little of this is outlined in the DEIR and there is no analysis of other DSM features that could be implemented to reduce long-term costs for the City's water, sewer and storm customers (and the region's sewer customers).

Would it be cost effective for the community to mandate water efficiency that exceeds code (e.g. Green Code Tier 1 or Tier 2)? Based on UC Davis' experience and the high cost of water and sewer infrastructure, better-than-code water efficiency may be a bargain.

Should the City consider scaling up its DSM program (including water reuse) instead of planning for future potable water plant expansions? Absolutely, if it is found to be cost effective through integrated resource planning!

ATTACHMENT B

College Terrace, Palo Alto

Project Characteristics as analyzed (based on available info):

- 8 affordable 1-bedroom units, (rez use is "low-rise apartments" = 5.96 trips/unit on 0.25 acres)
- 8,000 sq. ft. of grocery store (102 trips/1000 sq. ft.) (existing, but not sure of existing size. Included here)
- 5,580 sq. ft. retail (37 trips/1000 sq. ft)
- 39,000 sq. ft. office on 0.65 acres at 11 trips/1000 sq. ft
- Residential population: census at 2.47/unit, but these are all 1-bedrooms, so I estimated 1.5 per unit, 12 residents total
- 192 Employees: (1 employee per 350 sq. ft. of retail and 1/276 sq. ft office)
- 227 parking spaces all on 1.15 acres, build out year 2015
- (This info from MND – there is a webpage with slightly different info – not sure of status – appears to be in review)

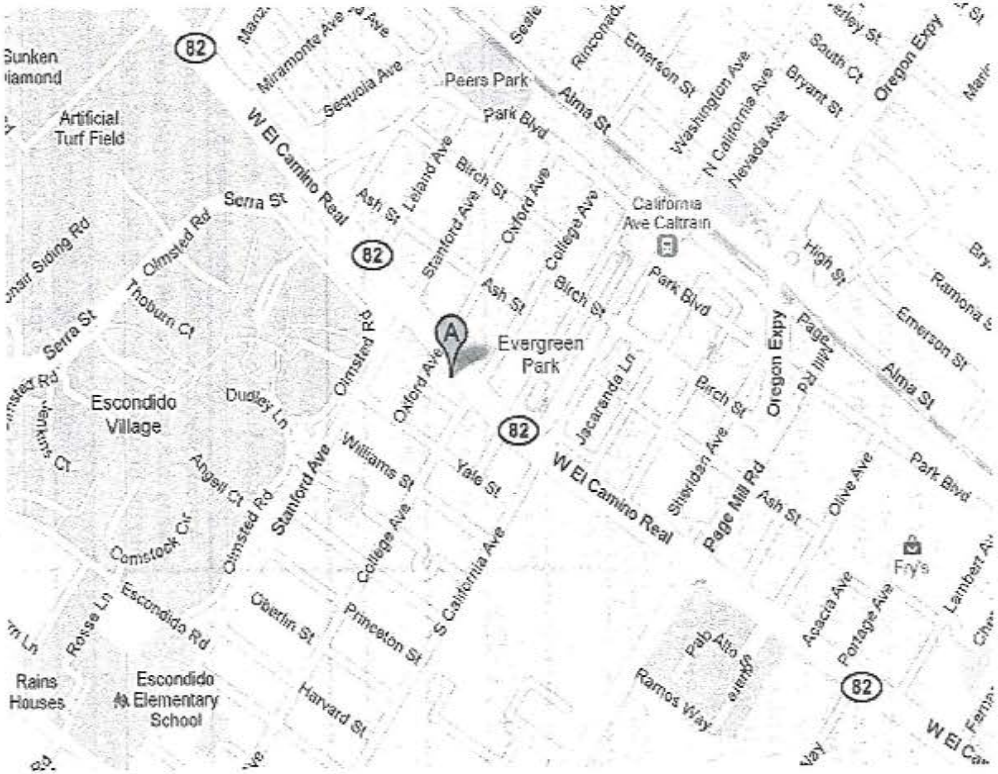
Project and Location Attributes	
Mix of Uses	Took census info and used it to determine ABAG projections within ½ mile of site in 2015: 676 housing, 1710 jobs (20% of census tract 5115.00)
Local serving retail within 1/2 mile	Yes. On El Camino and California Ave: restaurants, shopping, bike shop, coffee, deli, banks, yoga-gym, salon, etc, (also cultural/religious/educational instituions)
Transit Service	Caltran station w/in ½ mile; 52 stops a day. VTA stops for 22, 89, 522 with 293 stops/days within ¼ mile.
Bike & Pedestrian	St. network is limited to NW, assumed 500 i/s per sq. mile. Assume: 95% complete sidewalk and 50% bike accessibility
Affordable housing	100%
Passby Trips	Yes to passby. Allows users to account for primary/diverted/passby trips. When off, all trips are primary (& therefore more miles). When on = lower emissions b/c trips associated with each are shorter. Residential: 85/10/5, office: 75/20/5, supermarket/ retail 45/40/15, (source: ITE, Sandag)
Double Counting Correction	Assume that 1 residential trip/day/unit internal to the site. This is 12 trips total, and it means that these trips will not be counted as being generated at both the residential unit and the destination within the development (such a small number of trips in this case, not significant).
Additional Measures Added	
Paid Parking	Assumed 219 spaces for commercial use and $6/day charge, consistent with City of Palo Alto California St. charge. This TDM measure only will affect employee trips.
Additional TDM measures	Preferred carpool parking, carpool matching program, G Ride Home, Alt Trans info provided.
Energy Efficiency	Solid waste "landfiling with energy recovery", cool roofs, 20% above Title 24, solar (-5,000 kw/year) drought tolerant, low flush, reduce solid waste 10%, subtracted 1,000 kw/year for solar water heaters

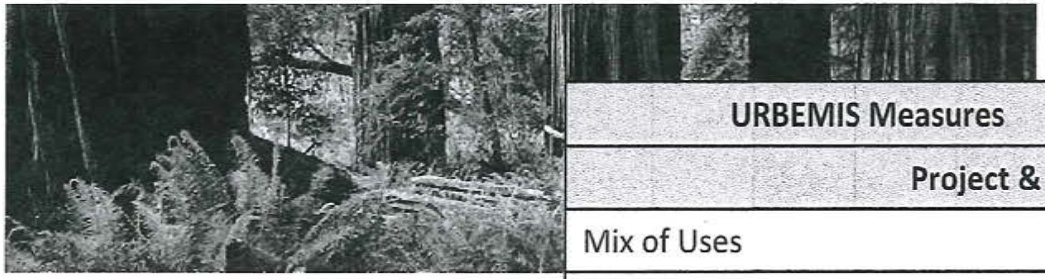
Residents: 12 Employees: 180 Service Pop: 192	**Project & Location Attributes**	**Additional Measures Added**
CO2e Emissions in Metric Tons		
Transportation	1,053	617
Electricity	238	294
Other (NG, water, waste)	372	165
Total Emissions	**1,663**	**1,076**
Metric Ton/Service Population	**8.66**	**5.60**

Case Study: College Terrace, Palo Alto

Project Characteristics:

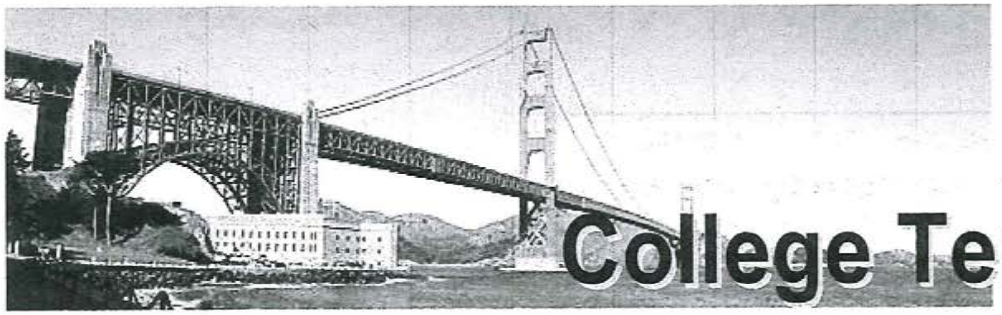
- 8 affordable 1-bdrm apartments
- 8,000 sq. ft. grocery
- 5,580 sq. ft. retail
- 39,000 sq. ft. office
- 227 parking spaces
- 1.15 acres





Case Study: College Terrace, Palo Alto

URBEMIS Measures	BAAQMD Methodology
Project & Location Attributes	
Mix of Uses	Yes
Local serving retail within 1/2 mile	Yes
Transit Service	Yes
Bike & Pedestrian	Yes
Affordable Housing	Yes
Passby Trip Correction	Yes
Double Counting Credit	Yes
Additional Measures Added	
Transportation Demand Measures:	
Parking Charge, Car-Sharing, Carpool Matching Program, Preferred Carpool/Vanpool Parking, Info on Transportation Alternatives	✓
Energy Efficiency:	
Solid waste "landfilling w/ energy recovery", cool roofs, 20% above Title 24, solar power, drought tolerant landscaping, low flush, reduce solid waste 10%, solar water heaters	✓



Case Study: College Terrace, Palo Alto

Residents: 12 **Employees: 180** **Service Pop:192**	**Project & Location Attributes**	**Additional Measures Added**
CO2e Emissions in Metric Tons		
Transportation	1,053	617
Electricity	372	294
Other (NG, water, waste)	238	165
Total Emissions	**1,663**	**1,076**
Metric Ton/Service Population	**8.66**	**5.60**

Notes: BAAQMG GHG Model (BGM) 1.1.9

Wilder Project, Orinda

Project Characteristics as analyzed (based on limited available info):

- 245 SFH on 0.5 each (122 acres). This density creates a higher trip rate of 10 trips/unit (rather than 3/acre at 9.57)
- Swim/recreation club 6,000 sq ft (40 trips/1000 sq. ft used "racquet/health club" rate from San Diego)
- 5 Playing fields (baseball/soccer, etc) assumed to be 33.7 acres and 10 acres passive use (used "city park" for these 10 acres at 1.6 trips/acre and 33.7 acres at 50 – combined to be 31.21 trips/acre)
- No information about art/garden center, not included
- Residential population: census at 2.66/unit, so 652 residents
- Assumed 17 employees for swim/health club (1 per 350/sq. ft)

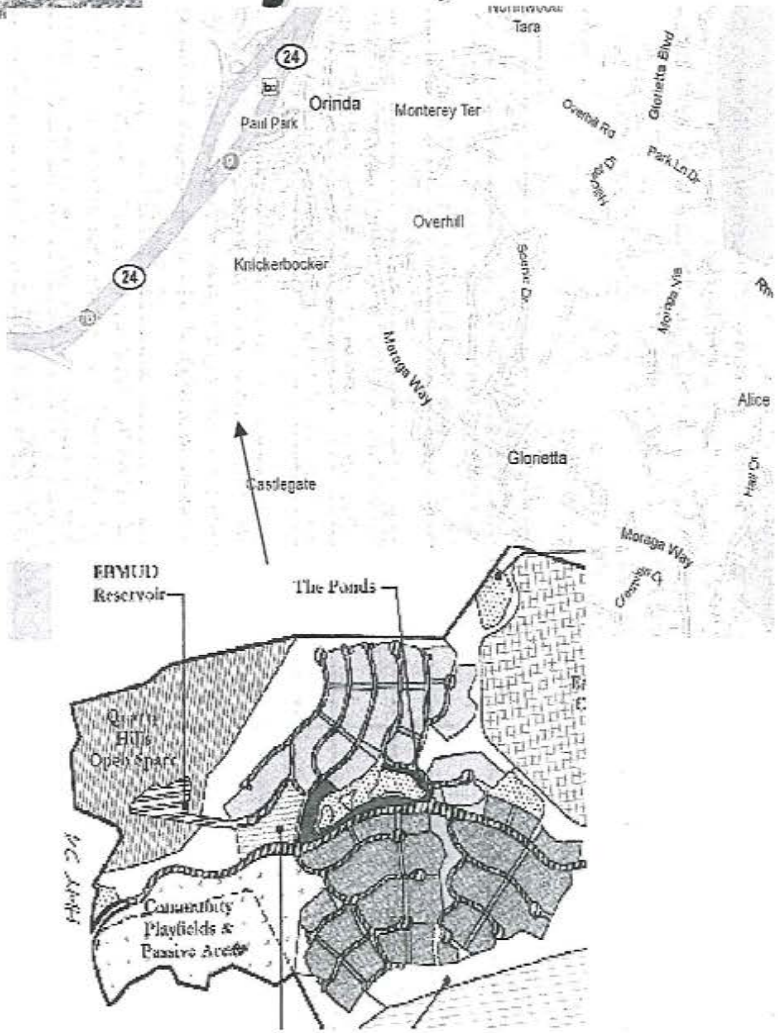
Project & Location Attributes	
Mix of Uses	Orinda BART, Downtown **not** within ½ mile, no ped x over hwy 24 from site, so assumed only the 17 jobs internal to the site.
Local serving retail within 1/2 mile	No
Transit Service	EIR calls for BART Shuttle. Not clear how many times a day. I assumed 16 stops a day (2/hour for 4 hours of peak, 1/hour for other 8 hours)
Bike & Pedestrian	100% sidewalks assumed, nothing for density of network or bike accessibility
Affordable housing	No
Passby Trips	Yes. Allows users to account for primary/diverted/passby trips. When off, all trips are primary (& therefore more miles). When on = lower emissions b/c trips associated with each are shorter. Residential: 85/10/5, city park: 70/25/5, health club 50/40/10, (source: ITE, Sandag)
Double Counting Correction	Assume that 213 residential trips/day/unit internal to the site (this is the max number Urbemis allowed me to use). This means that these trips will not be counted as being generated at both the residential unit and the destination within the development.
Additional Measures Added	
Additional TDM measures	Preferred carpool parking, carpool matching program, G Ride Home, Alt Trans info provided.
Energy Efficiency	Solid waste "landfiling with energy recovery", cool roofs, 20% above Title 24, solar (-5,000 kw/year) drought tolerant, low flush, reduce solid waste 10%, subtracted 1,000 kw/year for solar water heaters

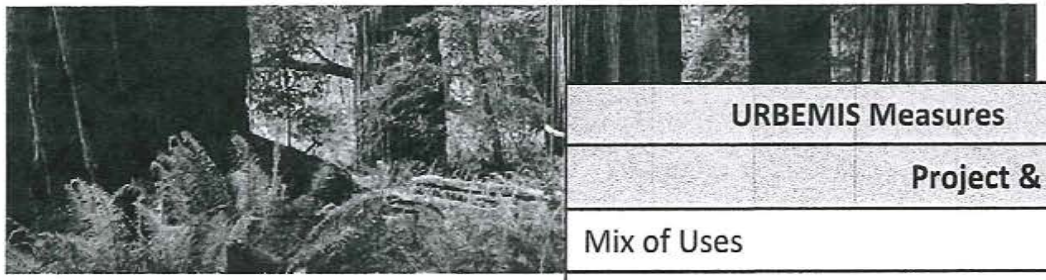
Residents: 652 Employees: 17 Service Pop: 669	**Project & Location Attributes**	**Additional Measures Added**
CO2e Emissions in Metric Tons		
Transportation	3,601	3,295
Electricity	692	129
Other (NG, water, waste)	1,232	844
Total Emissions	5,525	4,268
Metric Ton/Service Population	8.26	6.38

Case Study: Wilder Project, Orinda

Project Characteristics:

- 245 sfh on 122 acres
- Swim/health club 6,000 sq. ft.
- Sports playing fields
- "Art & Garden" center
- Open space





Case Study: Wilder Project, Orinda

URBEMIS Measures	BAAQMD Methodology
Project & Location Attributes	
Mix of Uses	Yes (but…)
Local serving retail within 1/2 mile	
Transit Service	BART Shuttle
Bike & Pedestrian	Yes (but…)
Affordable Housing	
Passby Trip Correction	Yes
Double Counting Credit	Yes
Additional Measures Added	
Transportation Demand Measures:	
Parking Charge, Car-Sharing, Carpool Matching Program, Preferred Carpool/Vanpool Parking, Info on Transportation Alternatives	✓
Energy Efficiency:	
Solid waste "landfilling w/ energy recover" cool roofs, 20% above Title 24, solar power, drought tolerant landscaping, low flush, reduce solid waste 10%, solar water heaters	✓

Case Study: Wilder Project, Orinda

Residents: 652 **Employees: 17** **Service Pop:669**	**Project & Location Attributes**	**Additional Measures Added**
CO_2e Emissions in Metric Tons		
Transportation	3,601	3,295
Electricity	692	129
Other (NG, water, waste)	1,232	844
Total Emissions	**5,525**	**4,268**
Metric Ton/Service Population	**8.26**	**6.38**

Notes: BAAQMG GHG Model (BGM) 1.1.9

Sciortino Ranch, Brentwood

- 160 single family units on 41.42 acres (4/acre = brings trips down to 9.20/unit)
- 0.92 city park (1.59 trips/acre)
- residential development to the north, east and south low-density suburban commercial development to the west.
- site is currently vacant and was historically used for agricultural purposes.
- Assumed 2015 build out year, Brentwood census is 3.11 people per du.

Note that since the NOP was released in November 2008, information about the project indicates that it has changed significantly to a high-density residential and mixed-use project. For our purposes, we will evaluate it as it appears in the state database.

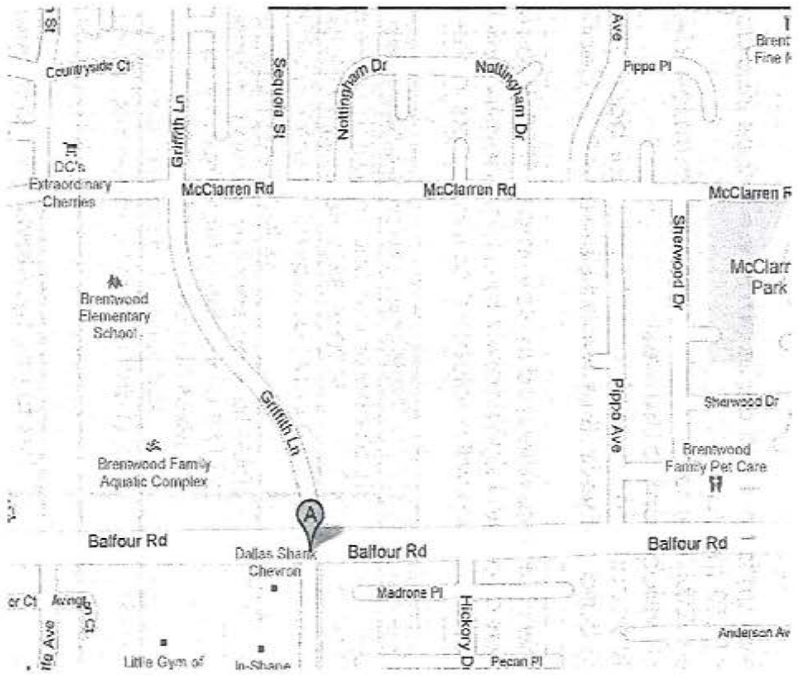
Project and Location Attributes	
Mix of Uses	Took census info and used it to figure out ABAG projections for ½ mile of site in 2015: 3322 housing, 771 jobs (20% of census tract 3032.00)
Local serving retail within 1/2 mile	No. Brentwood aquatic center, churches, 2 gyms, gas station, but not a mix of local serving retail (i.e. grocery store).
Transit Service	Tridelta. Conservative estimate is route 385 with10 stops/day. This results in a 0.17% reduction in trips. From some areas of the site, site could be within ¼ miles of more transit. Added this additional transit in for an additional scenario...176 stops a day...3% reduction with additional transit
Bike & Pedestrian	No. Didn't use, not enough info. St. network is limited due to suburban c-d-sac
Affordable housing	no
Passby Trips	Yes to passby. Allows users to account for primary/diverted/passby trips. When off, all trips are primary (& therefore more miles). When on = lower emissions b/c trips associated with each are shorter. Residential: 85/10/5, office: 75/20/5, supermarket, retail 45/40/15, (source: ITE, Sandag)
Double Counting Correction	No.

Residents: 498 Employees: 0 Service Pop: 498	**Project & Location Attributes**	**Added more transit**
CO2e Emissions in Metric Tons		
Transportation	1,628	1,581
Electricity	434	434
Other (NG, water, waste)	770	770
Total Emissions	**2,832**	**2,785**
Metric Ton/Service Population	**5.7**	**5.6**

Case Study: Sciortino Ranch, Brentwood

Project Characteristics:

- 160 sfh on 41.42 acres
- 0.92 acre city park
- Surrounded by residential development & some suburban commercial
- Greenfield site



Case Study: Sciortino Ranch, Brentwood

URBEMIS Measures	BAAQMD Methodology
Project & Location Attributes	
Mix of Uses	Yes
Local serving retail within 1/2 mile	
Transit Service	Yes
Bike & Pedestrian	
Affordable Housing	
Passby Trip Correction	Yes
Double Counting Credit	
Additional Measures Added	
Additional Transit	
Added 176 bus stops a day	✓

Case Study: Sciortino Ranch, Brentwood

Residents: 498 **Employees: 0** **Service Pop: 498**	**Project & Location Attributes**	**Additional Transit Added**
CO2e Emissions in Metric Tons		
Transportation	1,628	1,581
Electricity	434	434
Other (NG, water, waste)	770	770
Total Emissions	**2,832**	**2,785**
Metric Ton/Service Population	**5.7**	**5.6**

Notes: BAAQMG GHG Model (BGM) 1.1.9

Uptown, Oakland
Project characteristics:

- Located in downtown Oakland
- 700 multi-family units on 7 acres (100 units to acre = 4.92 trips/unit)
- 14,500 sq. ft. retail (43 trips/1000 sq. ft.)
- Excellent public transit
- Also included city park, trip rate 1.6 per acre

Build out year: 2011 b/c finished.

URBEMIS Measures	Project and Location Attributes
Mix of Uses	Yes (used census tract 402800 and determined the number of hh and jobs projected by ABAG for the ½ radius: hhs: 708 and job 3307
Local serving retail within 1/2 mile of project	Yes (food, retail, recreational, also nightlife, cultural institutions)
Transit Service	**108** BART trains and **1700 daily bus stops**. AC Transit: 1, 1R, 12, 13, 14,15, 18, 51, 51A, 72, 72M, 72R, 651, 800, 802, 805, 840, BA, NL
Bike & Pedestrian	Street network grid dense in complete for bay area, 100% sidewalks, 50% bike accessibility
	No other measures that I am aware of

Why does this work? Existing neighborhood, well served by transit, dense network, local amenities

Residents: 1,736 Employees: 41 Service Pop: 1,777	Emissions	1 employee per 350 sq. ft. or retail, residents based on census info.
CO2e Emissions in Metric Tons		
Transportation	3,200	
Electricity	1,041	
Other (NG, water, waste)	1,525	
Total Emissions	5,766	
Metric Ton/Service Population	**3.2**	

Case Study: The Uptown, Oakland

Project characteristics:

- Located in downtown Oakland
- 700 multi-family units
- 14,500 sq. ft. retail
- Excellent public transit

Case Study: The Uptown, Oakland

URBEMIS Measures	BAAQMD Methodology
Mix of Uses	Yes
Local serving retail within 1/2 mile	yes
Transit Service	Yes
Bike & Pedestrian	Yes
Affordable Housing	
Free Transit Passes	
Secure Bike Parking	
Guaranteed Ride Home Program	
Car-Sharing	
Info on Transportation Alternatives	
Carpool Matching Program	
Preferred Carpool/Vanpool Parking	
Reduced Parking Supply	
Double Counting Credit	
GHG Model Measures	
Drought tolerant landscaping	
Tankless water heaters	
10% waste reduction	
Efficient toilets	

Case Study: The Uptown, Oakland

Residents: 1,736 **Employees: 41** **Service Pop: 1,777**	**BAAQMD Methodology**
CO2e Emissions in Metric Tons	
Transportation	3,200
Electricity	1,041
Other (NG, water, waste)	1,525
Total Emissions	5,766
Metric Tons/Service Population	**3.2**

North Richmond Specific Plan, Contra Costa County

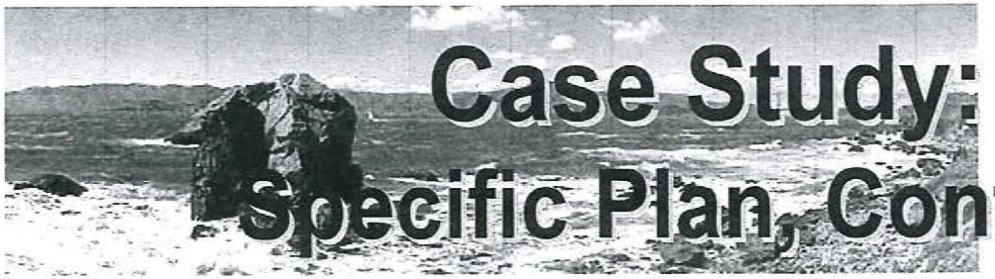
Project Characteristics as analyzed (based on available project description and added measures for examples):

- 2,100 dwelling units (200 SFH at 9.57 trips/day, 300 low-rise 6.90/day, 600 mid-rise 5.76/day, 1000 condos at 6.90/day)
- ~290,000 sq. ft. of retail (43 trips /1000 sq ft.)
- ~785,000 sq. ft. of office space (11 trips/1000 sq. ft)
- 71 acres of park/open space (13 acres at 1.6 trips/acre)
- Residential population: 5,796 people (2100*2.76 average persons per household for Richmond from census)
- Employees: 3,672 (1 employee per 350 sq. ft. or retail; and 1 employee per 276 sq. ft. or office)
- Bus route runs through development
- Build out year assumed 2020

URBEMIS Measures	**BAAQMD Methodology**
Mix of Uses	Yes, based on specific plan: hh 2100, jobs: 3316 (abag)
Local serving retail within 1/2 mile of project	Yes (within the plan)
Transit Service	Yes, 24 bus stops, 10 shuttles
Bike & Pedestrian	100% sidewalks, 20% bike accessibility
Affordable Housing	Yes, 10%
Free Transit Passes	
TDM: Secure Bike Parking	Yes (for commercial uses: at least 1 bike space per 20 vehicle parking spaces
Guaranteed Ride Home Program Provided	
Car-Sharing	
TDM: information provided on Transportation Alternatives	Yes (bike, bus schedules, maps)
Pay for parking	Assuming a modest $1 daily charge for parking for commercial uses
Preferred Carpool/Vanpool Parking	
Passby	Yes. allows users to account for primary/diverted/passby trips. When off, all trips primary. When on = lower emissions b/c trips associated with each: residential 85/10/5, retail; 45/40/15 Office: 75/20/5 (Source: ITE/Sandag)
Double Counting	No (turned it on by didn't include number)
GHG Model	
Drought tolerant landscaping	Yes
Tankless water heaters	Yes
10% waste reduction	Yes
Efficient toilets	Yes

North Richmond Specific Plan – GHG Emissions from Project Operations

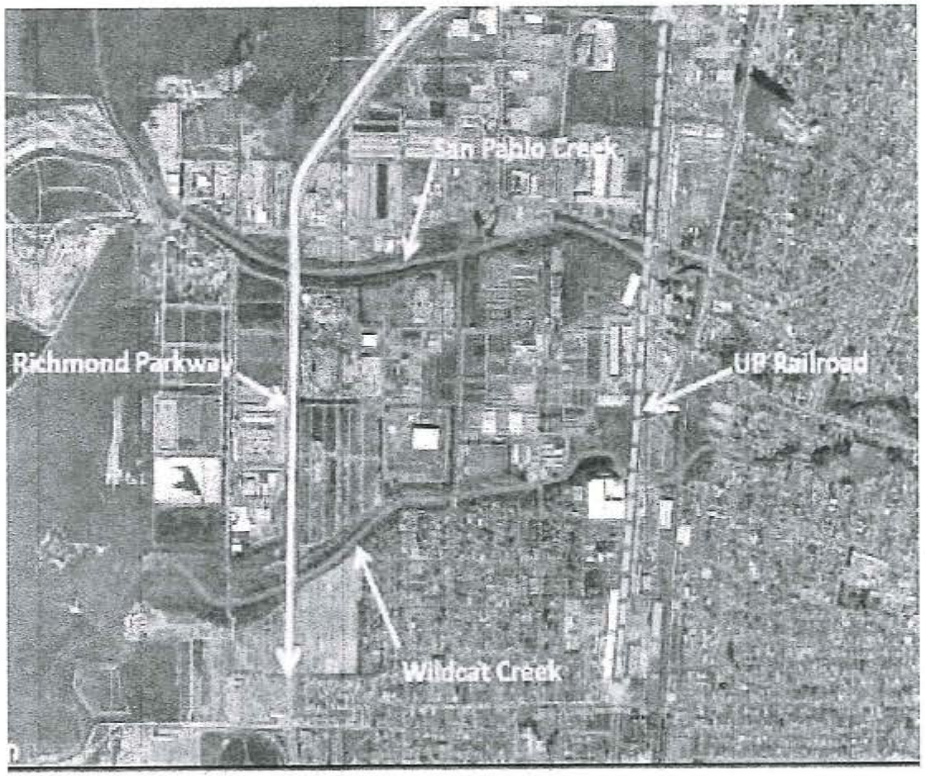
Residents: 5,768 Employees: 3,672 Service Pop: 9,440	**BAAQMD Methodology**
CO2e Emissions in Metric Tons	
Transportation	24,536
Electricity	9,126
Other (NG, water, waste)	10,668
Total Emissions	44,332
Metric Ton/Service Population	**4.6**

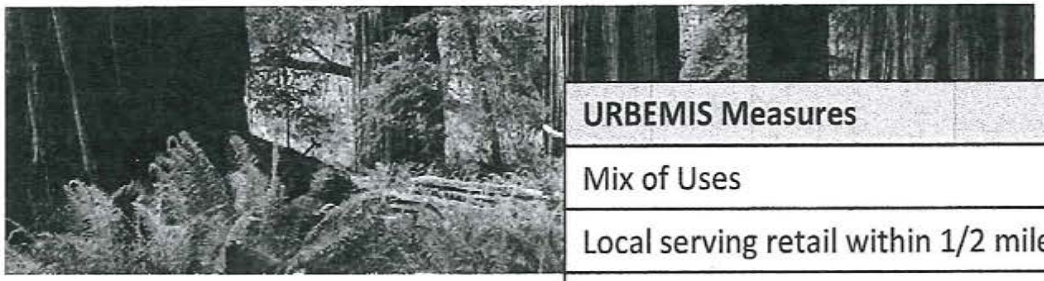


Case Study: North Richmond Specific Plan, Contra Costa County

Project Characteristics:

- 2,100 dwelling units
- ~290,000 sq. ft. of retail center
- ~785,000 sq. ft. of office space
- 71 acres of park/open space
- Several bus stops in Project area





Case Study: North Richmond Specific Plan, Contra Costa County

URBEMIS Measures	BAAQMD Methodology
Mix of Uses	Yes
Local serving retail within 1/2 mile	yes
Transit Service	Yes
Bike & Pedestrian	Yes
Affordable Housing	Yes
Free Transit Passes	
Secure Bike Parking	Yes
Guaranteed Ride Home Program	
Car-Sharing	
Info on Transportation Alternatives	Yes
Carpool Matching Program	
Preferred Carpool/Vanpool Parking	
Parking charge	Yes
Passby Trip Reduction	Yes
GHG Model Measures	
Drought tolerant landscaping	Yes
Tankless water heaters	Yes
10% waste reduction	Yes
Efficient toilets	Yes

Case Study: North Richmond Specific Plan, Contra Costa County

Residents: 5,768 **Employees: 3,672** **Service Pop: 9,440**	**BAAQMD Methodology**
CO2e Emissions in Metric Tons	
Transportation	24,536
Electricity	9,126
Other (NG, water, waste)	10,668
Total Emissions	44,332
Metric Ton/Service Population	**4.6**

ATTACHMENT C (CONCEPT)

7th & K Street Block 1 February 2011

Concept Climate Action Mitigation Plan Supplement (CAMPS) Rev 1.3

Note to City: This document was designed to be replicable for several types of development projects. This CONCEPT climate action mitigation plan supplement (CAMPS) was originally designed for use with the Draft Environmental Impact Report Climate Change Plan (CCP) for the Sacramento County Florin-Vineyard Gap Community Plan (see DEIR; Volume 3, Appendix C). The FVG Community Plan was fairly large; consisted of approximately 26 projects, 3,700 acres, 13,000 living units, 5 million square feet of commercial/ industrial space and has an estimated base case ghg emissions rate of 350,000 tonnes per year at full build out. (7% of County emissions)

In reviewing the DEIR Climate Change Plan (CCP) for the above project and NWLP Plan, it became apparent that any CEQA CCP must achieve the following objectives:

- permit holders must be able to easily understand and implement CCP
- CEQA lead agencies must be able to easily verify compliance with CCP
- enforcement and regulatory agencies must be able to enforce and hopefully quantify emissions savings from CCP

Although not necessary, additional desirable attributes of a CAP would include:

- a simple plan would allow AQMD's (or local jurisdictions) to specify a low significance threshold and
- a standardized template would provide a level-playing-field for all future CEQA CCP's and could assist in making the SB375 Sustainable Communities Strategy more consistent between State regions

The CCP submitted in the FVG DEIR partially met the first objective; NWLP meets none of the desirable objectives. The attached CAMPS is intended to be a supplement to the DEIR CCP and meets all objectives. The attached CAMPS is coordinated with SB375 requirements and is simple for permit holders and CEQA lead agencies because all questions can be answered with a Yes, No or Not Applicable.

The City should not accept a CCP that does not meet at least the first 3 objectives. The only other efforts that I'm aware of that try to quantify the value of greenhouse gas emissions under CEQA are:

- City of Davis staff report, April 2009
- CAPCOA Report, August 2010
- SCAQMD Effort to Develop Spreadsheet Model, late 2010

All of these efforts are in the formative stages of development, as was the FVG DEIR CCP and as is this CAMPS.

Simplicity to users comes at a price; to make this process simple for permit holders and CEQA lead agencies, some significant work should be put into a CAMPS template either by the City, AQMD, MPO, or perhaps OPR, Energy Commission, Air Resources Board, Integrated Waste Management Board, and/or Department of Water Resources. Some efforts would include:

1. Although this CAMPS is measurable and enforceable, the actual ghg emissions are not measurable without more information. Extensive empirical data and a units column is required to truly quantify ghg savings (an Excel measurable version of this is available- w/o correlated data)
2. Determine the benchmark "triggers" that would allow permit holder to answer Yes to a question, although with stakeholder modifications attached table could be used without benefit of ghg measurability
3. If a simple Yes/No process is desired, then the measures identified should be roughly equal in ghg emissions savings
   a. Several measures are tiered so that "Yes" may be answered many times for high value measures
   b. Some high value measures are double counted- e.g. Yes'es can be achieved for mixed use occupancy AND proximity to amenities
   c. A point system could be used instead of Yes/No/NA (similar to the 1980's Title 24 Residential prescriptive compliance method or LEED)
4. Carbon reducing measures shown are examples; stakeholder input is required to develop an acceptable template

Additional Features To Promote Market Penetration: In addition to conventional carbon reducing measures, this CAMPS includes features that should be considered for inclusion no matter what type of final process is settled upon for CEQA CAP's

1. Market Transformation: This CAMPS attempts to reward permit holders that implement measures that are not commonplace today, but may be in the future- e.g. restaurants that agree to not use Styrofoam food containers for at least a 6 month pilot period, PG&E offers maintenance for solar thermal systems, project chooses to exceed State RPS requirements. Similar to LEED, as market transforms, CAMPS measures should be updated.

2. Behavioral Changes Over Time: This CAMPS attempts to "sprinkle" some measures over an entire project to assist market transformation- e.g. relative even spacing of Neighborhood Electric Vehicles and raised bed gardens, solar photovoltaic throughout sub-divisions

3. Reward Local Jurisdictions: This CAMPS attempts to reward local jurisdictions that: (1) implement market transforming processes, policies or ordinances or (2) attempt to meet various State goals; e.g. implementing a RECO ordinance, Big and Tall ordinance, bi-level street lighting, offer carbon neutral water and solid waste services

   a. This is intended to meet the spirit of… "providing regulatory relief under CEQA" as identified in SB375. In effect permit holders receive credit at no cost to their project for processes, policies, and ordinances that are implemented by their local jurisdictions.

4. REACH Guidelines: For measures that City or State would like to see implemented, but do not want to codify at this time; e.g. 2 trees per lot, improved commercial recycling, web accessible parcel/ neighborhood level ghg emissions

5. Mandatory: Some measures are identified as "Mandatory". These items are generally cost effective, but not required by State Code. Mandatory features could be specific to local jurisdictions that require them.

REQUIREMENT: The NWLP Plan must achieve at least _50__% Yes ratio to meet carbon dioxide mitigation requirements.

Permit holders are to:

1. Fill out attached table and include in EIR with backup calculations.
2. Some measures are required and are indicated as Mandatory.
3. If a measure is not applicable to a project, indicate NA.
4. How many questions were answered with a Yes? ____
5. How many questions were answered with a No? ____
6. What percentage of questions were answered with a Yes where percentage = [Yes/(Yes+No)] ____
7. Did the project pass? [Y/N] ____

The outcome of some measures will not be fully known until construction is complete. If Yes ratio falls below percentage above, then fee of $ xx per percent (times base case ghg emissions for full build-out of project) shall be paid to City (or SMAQMD?) as an in lieu fee for off-site climate change mitigation projects.

Notes to City:

1. Fee should be based on NYMEX(?) value of CO2 at time of permit AND as approved by ARB Cap and Trade program.
2. EXAMPLE responses and explanatory notes are shown in red and *italicized*.
3. An Excel, operational version of this table is available.

Measure	Benchmark For Suburban		Actual For This Project		Benchmark Met?	
	Res	Comm	Res	Comm	Res	Comm
LAND USE (Stationary Source)						
Percent of project acreage that utilizes "brownfield", underused properties beneficially						

>=10%	Y/N	Y/N	*15%*	*NA*	*Yes*	*NA*
>=20%	Y/N	Y/N	*15%*	*NA*	*No*	*NA*
>=30%	Y/N	Y/N	*15%*	*NA*	*No*	*NA*
>=40%	Y/N	Y/N	*15%*	*NA*	*No*	*NA*
Percent of project acreage that is considered infill						
>=10%	Y/N	Y/N	*25%*	*NA*	*Yes*	*NA*
>=20%	Y/N	Y/N	*25%*	*NA*	*Yes*	*NA*
>=30%	Y/N	Y/N	*25%*	*NA*	*No*	*NA*
>=40%	Y/N	Y/N	*25%*	*NA*	*No*	*NA*
Percent of project (in acres) that is mixed use						
>= 10%	Y/N	Y/N				
>= 25%	Y/N	Y/N				
>= 50%	Y/N	Y/N				
>= 75%	Y/N	Y/N				
Density of Project						
>= 6 DU/acre	100%	NA	*100%*	*NA*	*Yes*	*NA*
>= 9 DU/acre	60%	NA	*58%*	*NA*	*No*	*NA*
>= 12 DU/acre	25%	NA	*23%*	*NA*	*No*	*NA*
>= 15 DU/acre	10%	NA	*12%*	*NA*	*Yes*	*NA*
Employees (FTE) per Job Acre						
>= 5	NA	100%	*Note: Floor to Area Ratio may be good alternative for this metric*			
>= 10	NA	60%				
>= 50	NA	30%				
>= 100	NA	10%				
Number of intersections per square mile (should be high)	12-16	6-12				
Number of dead-ends (e.g. cul-de-sacs) per square mile (should be low)	<= 1	<= 1	*0*	*0*	*Yes*	*Yes*
Percent of estimated burdened construction funds spent to build new roads vs. bicycle lanes, ped/bike amenities, NEV amenities, charging stations, transit capital improvements, transit operating costs, car sharing program start-up costs (modified metric from SB375 to suit new development)	40%	40%	*Note: Per metric, maximum of 60% spent on road construction; minimum of 40% spent on alternative modes; to include car share program start-up and placement of NEV's evenly through residential subdivision*			
All living units and commercial spaces front on a continuous pedestrian network	Mandatory	Mandatory				
Percent of living units within ½ mile riding distance of a bicycle lane						
Class I	50%	NA	*30%*	*NA*	*No*	*NA*
Class II	80%	NA	*100%*	*NA*	*Yes*	*NA*
Class III	100%	NA	*100%*	*NA*	*Yes*	*NA*
Percent of living units within ½ mile walking distance of at least x amenities (as defined by LEED for Neighborhood Development)			*Note: More amenities should be required for urban design*			

>= 1 amenity	40%	NA				
>= 3 amenities	25%	NA				
>= 5 amenities	10%	NA				
ALTERNATE for suburban projects: Number of auto, bike or ped connections per acre between adjacent projects that have complementary, yet different zoning	0.3	0.3	*Note: This metric does not require parcel level calculation and is appropriate only for suburban design* *Note: Project entropy may also be a reasonable metric*			
Percent of living units within ½ mile of class B Park, community garden, publicly accessible open space, (or separated Class I bike path with minimum easement of 30 foot width)	80%	NA				
Jobs to Housing Ratio: Jobs (real or zoned) within ½ mile walking distance of residential project (SB375 metric)						
Total	1:10	NA				
Percent of jobs able to afford rent/ mortgage (max 40% wage, for FTE, 1 earner)	60%	NA				
Jobs to Housing Ratio: Living units (real or zoned) within ½ mile walking distance of commercial project (SB375 metric)						
Total	NA	10:01				
Percent of jobs able to afford rent/ mortgage (max 40% wage, for FTE, 1 earner)	NA	60%				
Percent of living units within ½ mile of a transit stop with a minimum transit frequency service level of x stops/week (SB375 metric) per RT calcs (service level met within 5 years of permit)			*Note: This benchmark is under land use because supportable transit frequency is heavily dependent on living unit density*			
Level of Service B	25%	NA	*12% per RT*	*NA*	*No*	*NA*
Level of Service C	40%	NA	*15% per RT*	*NA*	*No*	*NA*
Level of Service D	70%	NA	*20% per RT*	*NA*	*No*	*NA*
Percent of commercial spaces within ½ mile of a transit stop with a minimum service level of x stops/week (SB375 metric)			*Note: This benchmark is under land use because supportable transit frequency is heavily dependent on employment density*			
Level of Service B	NA	80%				
Level of Service C	NA	100%				
Level of Service D	NA	100%				
Number of trees planted per living unit (including apartments)	2.0	NA				

Number of trees planted per square foot of commercial space	NA	0.01				
Percent estimated tree canopy coverage after 15 years (include roads)	20%	20%				
CC&R's do not restrict solar, clothes drying lines, chickens allowed per following guidelines(?)	100%	NA				
Percent of living units that require residential vehicle parking permit			*Note: County action required for this one- not likely sellable in suburbs unless there is a chance for homeowners to receive credit- e.g. $20/yr fee for standard car; $20/yr credit for plug-in hybrid; $30/yr credit for NEV... need funding source though or charge high fees for standard cars (i.e. feebate)*			
Permit required for cars, no/low fee for first car	100%	NA				
Increased fees for 2nd and subsequent vehicles	25%	NA				
Reduced fees for NEV's, plug-in hybrids, alt fuel vehicles	25%	NA				
COMMUTES and TRIPS (Mobile Source)						
Percent of commercial space that includes end-of-trip bicycle amenities (shower, lockers)	NA	25%				
Percent of commercial space that meets LEED ND requirements for bicycle parking	NA	Mandatory				
Percent of road-miles that are NEV capable (<= 35 mph)	100%	50%				
Impermeable surfaces that have reflectivity greater than State requirements			*Note: State action required for this one to identify benchmark*			
Roads	75%	75%				
Sidewalks	100%	100%				
Parking Lots	75%	75%				
Percent of transit stops that are covered, have benches, have at least 2 sides protected from wind, solar powered lighting and electronic schedule update board w/ GPS on buses to improve board schedule accuracy (in lieu fees ok in high-vandal areas?)						
Level of Service B	100%	100%				
Level of Service C	50%	50%				
Level of Service D	25%	25%				
Percent of apartment houses that						
Decouple room rent from car space rent	100%	NA				
Offer car share programs to their tenants and have a minimum of 1 car per x units	100%	NA				

Tenants agree to not have a second car for at least 6 months (one car ok)	50%	NA				
Percent of businesses (> 50 employees) that have transportation system management plans						
>=50% transit subsidy	NA	100%				
Parking cash out/ charge employees for parking	NA	100%				
Provide results from bi-annual survey to SACOG(?)	NA	100%				
Percent of homes provided with neighborhood electric vehicle (NEV), relatively evenly spaced at 1 per 10 living units	10%	NA				
Percent of homes provided with car share vehicle						
AND at least 4 other homes within ¼ mile agree to share	10%	NA				
AND half agree to NOT have second car for at least 6 month pilot	100%	NA				
Percent of fuel stations that offer B-5 bio-diesel and E-85	NA	100%				
AND B-20 bio-diesel	NA	50%				
Percent of homes provided with electric lawn mower	100%	NA				
Percent of construction vehicles that meet SMAQMD preferred emissions rate (should be high, but may be difficult to enforce over long period of construction?)	80%	80%				
GOODS MOVEMENT (Mobile Source)						
Percent of homes provided with raised bed garden, minimum of 200 square feet, relatively evenly spaced at 1 per 10 living units	10%	NA				
Apartment houses that offer (100% compliance required):						
Community gardens of at least 50 SF to x% of tenants	10%	NA				
Community gardens of at least 50 SF to x% of tenants	20%	NA				
Fenced, gated, water, tool shed, $500/yr annual budget provided by owner	100%	NA				
Apartment houses that do NOT offer on site gardens (100% compliance on and off-site required):						
Fee to City ok if new garden is within ½ mile and SF portion earmarked for tenants	100%	NA				

Four times fee to City ok if new garden is > 1 mile away; no earmark for tenants	100%	NA				
Percent of markets > 5,000 SF that have agreed to provide 25% of fruits and vegetables from farm sources within 100 mile radius						
6 month pilot	NA	50%				
Permanent	NA	25%				
Percent of markets > 5,000 SF that have agreed to provide 10% of canned goods from processing plants within 100 mile radius						
6 month pilot	NA	50%				
Permanent	NA	25%				
Percent of shops > 5,000 SF that have agreed to provide 10% of goods from manufacturing plants within 100 mile radius						
6 month pilot	NA	50%				
Permanent	NA	25%				
Project includes manufacturing plant that projects that >=50% of raw materials to produce product will be sourced from < 300 miles						
Per x tons/yr of mat'l used	NA	100				
Per x tons/yr of mat'l used	NA	200				
Project includes manufacturing plant that projects that >=50% of products will be sold to vendors within 300 miles						
Per x tons/yr of product	NA	100				
Per x tons/yr of product	NA	200				
FACILITY ENERGY (Stationary Source)						
Percent of living units and commercial that exceed Title 24 (to include on-site solar)			*Note: County and CEC action required for this one to beat Title 24 by 15%*			
>= 15%	Mandatory	Mandatory	*100%*	*100%*	*Yes*	*Yes*
>= 25%	50%	50%				
>= 35%	25%	25%				
Carbon Neutral (Off-Site)	10%	10%				
Net Zero Energy (On-Site)	5%	5%				
Living units are built in a jurisdiction that has a Big and Tall ordinance similar to Marin County's except sized for [1,500] SF	100%	NA	*Note: County action required for this one. This is an "environmental justice" concept which requires larger homes to be more efficient*			
Living units are built in a jurisdiction that has a Residential Energy Conservation Ordinance that meets State requirements	100%	NA	*Note: State and County action required for this one*			
Living units are built in a jurisdiction that has a Commercial Energy Conservation Ordinance that meets State requirements	100%	NA	*Note: State and County action required for this one*			

Percent of electric operating power provided to project over the next 30 years that is above and beyond State Renewable Portfolio Standard (RPS) requirements (to include on-site solar electric, but not energy efficiency)			*Note: Need to work with SMUD, this is not an existing program. This would be similar to a long-term Greenergy program*
10%	Mandatory	Mandatory	*Note: County action required for this one to beat State RPS*
20%	60%	60%	
40%	30%	30%	
Carbon Neutral (Off-Site)	5%	5%	
Natural gas fired cogeneration, minimum thermal/electric efficiency of 55% serves at least 10% of project electrical needs (solar pv ok)	1 each	1 each	
x% of annual fuel use is renewable	25%	25%	
x% of annual fuel use is renewable	50%	50%	
x% of annual fuel use is renewable	75%	75%	
Percent of living units equipped with solar domestic hot water that provides minimum of 60% annual needs (* PG&E approval of system design)	100%	NA	
PG&E monitors Smart meter and has method to notify customer if solar system appears to need maintenance	100%	NA	*Note: Similar line items could be developed for SMUD and solar pv systems*
* PG&E offers monthly fee for service for maintenance	100%	NA	
Percent of living units that are pre-plumbed for solar photovoltaic	100%	NA	
Percent of living units equipped with solar electric that provides minimum of 25% annual needs, relatively evenly spaced, facing street	10%	NA	
Percent of traffic intersections that utilize LED signal lighting	100%	100%	*Note: County action required for this one*
Percent of street lighting that uses dual-level LED lighting with occupancy sensor control	50%	50%	*Note: County action required for this one; consider maintenance feedback and 911 feed-forward*
Percent of fire stations, police stations, restaurants and fitness centers equipped with solar domestic hot water that provides minimum of 60% annual needs	NA	100%	*Note: County action required for this one to require solar for fire, police*
Percent of businesses (by square foot) equipped with solar electric that provides minimum of 10% annual needs	NA	10%	

For living units that are provided with such (e.g. apartments), percent and number of refrigerators, washing machines, dishwashers, TV's that are Energy Star "Silver" compliant	100%	NA	*Note: Energy Star "Silver" may not yet be available. Coordinate with Federal EPA*			
Percent of homes that are pre-wired for plug-in hybrids and NEV's	100%	NA				
Percent of living units with access to natural gas in back yard for future BBQ and electric outlets for electric grounds maintenance equipment	100%	NA				
Percent of living units that have heating and cooling systems and electric dryers controlled remotely by utility for demand response through use of Smart meters	100%	NA				
WATER (Stationary Source)						
Percent of living units and commercial that use no more than x% of business as usual potable water						
<= 80%	Mandatory	Mandatory	*Per CalGreen effective 7/1/11*			
<= 60%	50%	50%				
<= 40%	25%	25%				
<= 25%	10%	10%				
Water purveyor offers voluntary carbon neutral water services			*Note: Need to work with water purveyors to develop program*			
Purveyor offers service	Y/N	Y/N	*Note: Surcharge approximately 2%, therefore enrollment requirements are HIGH*			
Percent enrolled	25%	15%				
Percent of living units and commercial meeting State approved drought resistant landscaping standards	100%	100%	*Note: State action required for this one to identify planting benchmark*			
Percent of living units utilizing recycled water for irrigation	80%	NA				
Percent of living units utilizing gray water for irrigation	20%	NA	*Note: County action may be required to allow gray water use*			
Percent of businesses (by acres) utilizing recycled water for irrigation	NA	80%				
Percent of roof space that has a "living" roof	NA	25%				
Percent of project acreage that utilizes low-impact storm water management (to include retention basins?)	>= 80%	>= 80%				
Percent of project acreage that utilizes high-impact conventional storm sumps (to include detention basins?)	<= 20%	<= 20%				

Local water purveyor has adopted a water resources loading order; if City operated, resolution has been passed similar to the attached	Y/N	NA				
WASTE (Stationary Source)						
Project achieves exemplary construction and demolition recycling under City and County ordinance	100%	100%	*Note: County (and City) action required to identify "exemplary"*			
Solid waste provider offers carbon neutral solid waste services			*Note: Need to work with solid waste providers to develop program*			
Provider offers service	Y/N	Y/N				
Percent enrolled in any program	10%	3%	*Note: Surcharge approximately 25%, therefore enrollment requirements are LOW*			
Percent of emissions sequestered due to local, "ARB additional", tree planting program	25%	25%				
Percent of restaurants (>1,000 SF) that have agreed to not use Styrofoam food containers for period shown			*Note: Some jurisdictions ban Styrofoam*			
6 month pilot	NA	50%				
Permanent	NA	25%				
Percent of shops (>1,000 SF) that have agreed to not use disposable plastic or paper bags for specified term			*Note: Some jurisdictions ban or impose fees on disposable bags*			
6 month pilot	NA	50%				
Permanent	NA	25%				
Percent of shops (>1,000 SF) that sell fountain drinks or coffee to go, that offer deep discount to those that use their own cup						
6 month pilot	NA	50%				
Permanent	NA	25%				
Percent of apartment houses provided with first class recycling facilities	100%	NA	*Note: County (and City) action required to identify "first class"*			
Percent of commercial space (>1,000 SF) provided with first class recycling facilities	NA	50%	*Note: County (and City) action required to identify "first class"*			
Percent of living units signed up to NOT receive junk mail from the post office	50%	NA				
Percent of annual green waste delivered to local distribution site (<10 miles) for residential and business use	25%	NA	*Note: This could go under GOODS MOVEMENT and is similar to program in Berkeley, CA*			
Green waste is used to provide power and nutrients to grow fruits and vegetables in a greenhouse	NA	1 ea				
Percent of homes provided with mulching/ composting/ worm bins	25%	NA	*Note: This could go under GOODS MOVEMENT*			
AWARENESS						

Percent of utility accounts provided with Smart electric, gas and water meters and have one-site web accessible usage and comparison data by parcel and also neighborhood aggregated data	100%	100%	*Derived from Curtis Park Energy Stars program*			
Website to include neighborhood scale data regarding solid waste, updated once per year	100%	100%	*0%*	*0%*	*No*	*No*
Website to include neighborhood scale data regarding transportation, updated once per year	100%	100%	*0%*	*0%*	*No*	*No*
Website to include innovative neighborhood scale data (e.g. Goods Movement) regarding greenhouse gas emission data for other sectors, updated once per year	100%	100%	*0%*	*0%*	*No*	*No*
Website to include neighborhood scale data regarding greenhouse gas emissions, updated once per year	100%	100%	*0%*	*0%*	*No*	*No*
Percent of shops (>1,000 SF) that agree to provide educational materials (central location in mall ok) for a period shown on products that have high global warming potential (e.g. computer dusters, Styrofoam, virgin copy paper, incandescent bulbs, disposable batteries, bottled water, etc.)						
6 month pilot	NA	50%				
Permanent	NA	25%				
Number of businesses that provide bid preferences to vendors that operate per requirements of City of Sacramento sustainability preference program and achieve at least 20 points	NA	10%	*Note: Coordinate with City of Sacramento program*			
Percent of living units sold that are provided with a welcome basket that includes educational materials and a selection of "green" items as noted to right, (valued at say $1,000) *Higher cost items would have line item entry-e.g. NEV, raised bed garden, electric mower, solar pv, etc.*	100%	*Note: Items that might be included in welcome basket are-several compact fluorescent (and LED?) light bulbs, reusable coffee mug, reusable drink mug, canvas shopping bag, rechargeable batteries and charger, BBQ chimney charcoal starter or natural gas BBQ, clothes line, fruit and vegetable seeds, 90 day free car share program gift certificate, 90 day free bus pass gift certificate and 2 years subsidized at 50% bus pass gift certificate, occupancy sensor controlled plug strip*				

ATTACHMENT D: Frequently Asked Questions

How To Address Climate Change In Development Projects (CONCEPT)

Q1: Does my project require an Environmental Impact Report (EIR)?

A1: See BAAQMD CEQA Guidelines, June 2010; Table 3.1 to determine if your project exceeds the screening criteria identified.

- If criteria is exceeded, then an EIR is required
- If criteria is NOT exceeded, then Best Management Practices (BMP) for Climate Change for Small Projects must be complied with. STOP… No other requirements of this FAQ sheet are required if criteria is NOT exceeded.

Q2: Must I calculate the construction and operational greenhouse gas (GHG) emissions for my project? If so, how?

A2: If an EIR is required, then yes construction and operational GHG emissions must be calculated for the base case and for each alternative modeled. The recommended method for calculating GHG emissions is the CalEEMod computer model which is an update of the URBEMIS travel computer model. The GHG emissions must be reported in metric tons per yr (MT/yr), not US tons per year as is normal with criteria pollutants.

One alternative that must be analyzed is inclusion of the BMP's identified for small projects, along with the projected cost and annual cost savings.

Q3: What are the City's requirements for compliance?

A3: Compliance can easily be determined if the number of residents living in, and the number of workers expected to be employed, during the operational life of the project is known and if the GHG emissions from Q2 is known. The sum of the number of expected residents and work staff at buildout is known as "service personnel" (sp).

Expected number of residents per dwelling unit and number of employees per 1,000 SF can be found at ??? Values used must be identified in EIR.

- The City requires each development project to achieve an operational GHG efficiency of 4.6 MT/yr-sp or lower.
- For well-designed projects, the City has a voluntary stretch target of [4.0] MT/yr-sp. Incentives are available for projects that reach towards stretch target.

Q4: How can I comply with the City requirements?

A4: CalEEMod has many options that can be analyzed. In addition, for those interested in understanding how GHG savings are calculated, CalEEMod was based on CAPCOA's Mitigating Greenhouse Gas Emissions Guide, August 2010

Q5: What if none of my project alternatives comply with City requirements?

A5: Work with City staff (and/or SMAQMD) to identify options that may have been overlooked. If compliance can't be achieved, request SMAQMD to write a letter to the City identifying efforts made to comply.

ALTERNATIVE: require off site mitigation if target can't be met on-site

Q6: What incentives are available for striving to meet voluntary target?

A6: Greenwise investment pool?, federal tax credits? Other?

ATTACHMENT E

Best Management Practices for Climate Change For Small Projects (CONCEPT)

State type and size of project and what criteria from Table 3-1 was used to meet small project requirements _____

1. The California Green Code, Tier 1 requirements must be complied with for the following sections:
    a. Energy
    b. Water

2. The California Green Code, Tier 2 requirements must be complied with for the following occupancies:
    a. Commercial buildings must meet Energy

Attachment F- Is 7/K Consistent with Greenwise Initiative Goals? GOAL Objective Strategy Action				7/K	How?
1. Create a Self-Sustaining Sector - ECONOMY					
	2020 Objective 1 Double the Number of Green Jobs in the Region from 14,000 to 28,000			Yes	Beat Title 24 by 15-20%
		Strategy 1: Build Capacity within the Region's Institutions to Support the Clean Energy Technology Cluster		No	
			1. Establish and expand existing incubation and demonstration/validation centers.	No	
			2. Build a new innovation forum focused on leveraging smart grid and building new business opportunities for regional companies.	No	
			3. Increase the effectives of Enterprise Zones and tax credits for companies.	No	
			4. Develop a talent pool of "serial entrepreneurs" to complement initial technical talent/inventors.	No	
			5. Leverage connections among local university researchers, entrepreneurs, and existing companies to commercialize innovations.	No	
			6. Create an innovation ecosystem by cultivating connections among clean technology companies, other knowledge-intensive companies, existing industries, and universities to spur new innovations and facilitate technology commercialization.	No	
			7. Foster the creation of start-up companies that are "fundable" by seed or venture investors.	No	
		Strategy 2: Stimulate manufacturing of renewable energy equipment in the region		No	
			1. Identify target sites for attracting manufacturing companies.	No	
			2. Create renewable energy enterprise parks in the region.	No	
			3. Seek state legislation for "Green Enterprise Zones".	No	
			4. Create regional incentive packages for business attraction and retention.	No	
			5. Implement group/employee purchasing programs to create demand for renewable energy products.	No	
		Strategy 3: Educate the Green Technology Workforce		No	
			1. Study regional labor market demands for emerging clean technology industries.	No	
			2. Expand the role of an existing Steering Committee to develop education programs, matriculation paths and goals for K-20 schools and post-secondary institutions.	No	
			3. Working with labor, develop education and training programs that prepare for multiple career tracks in the green economy from K-20.	No	
			4. Connect students and job seekers to employers through a variety of programs.	No	
			5. Create a complete training ladder for local workforce development.	No	
		Strategy 4: Develop local sources of distributed energy by growing the local solar heating and cooling industry, biomass, wind/river turbines and other energy sources to increase energy independence		No	
			1. Create long-term partnerships of land acquisitions and Purchase Power Agreements.	No	
			2. Finish applying technologies and infrastructure to land and prepare for final stages of emerging technology development areas.	No	
			3. Further develop innovative policies like feed-in-tariffs and tax credits to incent distributed energy.	No	
			4. Indentify and develop the local infrastructure needed to support distributed energy adoption.	No	
			5. Continuously evaluate best available technologies to achieve the goal of growing the local economy.	Yes	EE design
		Strategy 5: Promote the Sacramento region's green and clean technology products for export		No	
			1. Work with Congresswoman Matsui's office to have Sacramento firms take advantage of the recently enacted "Clean Technology Manufacturing and Export Assistance Act of 2010" authored by the Congresswoman.	No	
			2. Seek advice for regional firms so that they may increase exports and navigate foreign markets.	No	
			3. Support federal and state policies to reduce production costs and encourage innovation, investment and in the clean technology sector.	No	
			4. Track the export markets and report on growth in the region's clean technology exports annually.	No	
	2020 Objective 2 Create a $1 Billion Investment in the Sacramento Region's Green Economy			Yes	
		Strategy 1. Create a Greenwise JPA to Leverage Local Treasury Pools as Sources of Funding		No	
			1. Convene potential public sector funders including the Treasurer-Tax Collectors from the six counties in the Sacramento region to discuss investment in local retrofit projects.	No	
			2. Convene school district representatives from the six-county region to discuss benefits of energy and water retrofits. Based on interest, establish JPA with initial $100 million for retrofit projects to be expanded as funding and agreements with additional districts are established.	No	
			3. Continue retrofits throughout school districts in region and track energy and water savings through Greenwise Joint Venture.	No	
			4. Continue outreach to area school boards and superintendents to show savings. Advocate for energy and water efficiency investment through Greenwise JPA and school bond revenues.	No	
		Strategy 2. Create Robust Local Financing Environment that Enables Implementation of Consumer and Commercial Energy Projects		Yes	
			1. Benchmark existing funding sources and publish to the Greenwise website.	No	
			2. Create a clearinghouse for private sector funding options to increase the number of homeowners/business owners with access to and knowledge of capital for energy efficiency upgrades.	No	
			3. Consider a more robust, local feed-in-tariff program.	No	
			4. Implement a commercial PACE program.	No	
			5. Provide on-bill financing for residential and commercial customers.	Yes	Innovative financing

GOAL	Objective	Strategy	Action		
			6. Increase the number of Energy Efficient mortgages offered by regional banks.	Yes	option
			7. Create consistent incentives across the region and align rebates through the three main utilities by 2013.	No	
			8. Create a consumer advocate position that provides unbiased evaluation and finance counseling.	No	
		Strategy 3: Build Mechanisms and Internal Capacity to actively Fund Innovative Clean Tech Companies		No	
			1. Create an active and fully funded "Venture Capital" Road Show to pitch the region's assets and companies to venture-focused audiences.	No	
			2. Expand training for entrepreneurs that helps companies win seed money.	No	
			3. Establish a seed grant pool for start-up companies. Link this to state activity such as the California Clean Energy Fund.	No	
			4. Develop a revolving loan fund involving regional banks to support growing clean tech companies.	No	
			5. Recruit financial institutions and financial talent/expertise to the region.	No	
			6. Establish standards and warranties for solar panels in California that make growing solar technology firms more "bankable".	No	
			7. Create a "guarantee fund" to back projects and technologies, similar to the FDIC program for financial institutions, with support from Congress.	Yes	Greenwise investment pool
			8. Pursue greater involvement from large institutional investors like CALPERS and CALSTERS.	No	
			9. Create private enterprise rebates for early adoption of new technologies. Our California is an ideal marketplace for early stage clean technology companies in California test their products.	No	
		Strategy 4, Secure $100 million over 10 years to finance Infill Development Projects and "20 Minute Neighborhood" Projects		Yes	Voluntary GHG threshold incentivies infill
			1. Apply for and secure state and federal grants to incentivize model infill projects throughout the region. This includes leveraging infrastructure and planning funding opportunities through the California Strategic Growth Council and federal Partnership for Sustainable Communities.	Yes	
			2. Build public-private partnerships to attract investment from the private sector.	Yes	
	2020 Objective 3 Purchase 20% of the Region's Food from Local Farmers and Ranchers			No	
		Strategy 1: Increase assistance to local farmers enabling them to shift to production and cropping systems that will feed local markets		No	
			1. Establish relationships with growers throughout the region with increase grower outreach and create a database of growers and capacities.	No	
			2. Identify growers currently growing for the local market. Assess the capacity of growers within the region to grow for the local market and obtain increased grower commitments and acreage for fresh market production.	No	
			3. Provide one-on-one technical support and group training programs. This includes support for a diversity of farmers of differing scales and includes food safety, organic practices, business planning, crop planning for fresh market production, farmland conservation and land tenure assistance.	No	
			4. Assist in matching growers with providers of needed credit and capital.	No	
		Strategy 2: Change Both the Distribution and Demand Side of the Local Food Market		No	
			1. Establish relationships with institutional buyers.	No	
			2. Develop a business plan for food aggregation, processing and distribution facilities.	No	
			3. Build facilities in region that allow farmers to produce value-added projects (such as jams and candied nuts in Yolo County) and commercial kitchens to allow for smallscale production of	No	
			4. Develop linked urban and rural facilities that source, store, aggregate, process and maintain source identity for local produce serving regional market demand.	No	
			5. Create marketing and brand development to serve existing and new markets including the food box program business development, large retail grocers, distributors, hospitals, and school districts.	No	
			6. Identify private and public investment dollars.	No	
		Strategy 3: Develop Policies and Support Infrastructure to Increase Local Food Distribution and Consumption		Yes	Rooftop garden
			1. Inventory existing policy barriers at the regional, state and federal levels, with the help of stakeholders throughout the region.	No	
			2. Develop new policies throughout the region and state that help farmers remain economically viable; increase linkages between local food production and consumption and increase educational opportunities about the health and economic benefits of purchasing from local growers.	No	
			3. Work with appropriate government agencies to develop a plan of action so that supportive policies can be promoted.	No	
	2020 Objective 4 Create a Regional Market for Green and Clean Technology Products			Yes	Beat Title 24 by 15-20%
		Strategy 1: Develop New Financing Tools to Encourage Green Purchases		Yes	
			1. Convene a "Bank Summit" with regional and national bank representatives and county treasurers to create new financing tools for local green projects.	No	
			2. Support the reinstatement of PACE financing.	No	
			3. Implement a commercial PACE program.	No	
			4. Work with utilities to introduce and maximize on-bill financing.	Yes	
			5. Partner with Energy Upgrade California to link consumers with financing tools.	No	
		Strategy 2: Become a Prime Location for Product Testing Centers and Support those Already in the Region		No	
			1. Identify possible testing facilities to recruit to the region.	No	

GOAL	Objective	Strategy	Action		
			2. Assemble the necessary coalition of support and develop a strategy to make it happen.	No	
			3. Provide "wrap-around support" to businesses located in the product testing centers.	No	
			4. Identify early adopters/influencers to encourage piloting and adoption of new technologies (public, private, state and Beale Air Force Base).	No	
		Strategy 3: Create a Regional Carbon Indexing Program for Purchased Goods		No	
			1. Start with local grocery stores as a pilot program.	No	
			2. Involve the Greenwise Leadership Advisory Council in sharing best practices (Walmart) to index goods sold by retailers.	No	
		Strategy 4: Develop a Green Pages 2.0 Directory of Local Green Products and Services		No	
			1. Define the scope of uses and types of companies to be included, intended uses and audiences.	No	
			2. Gather data on companies and write Green Pages 2.0.	No	
			3. Publicize and distribute throughout the region.	No	
			4. Develop local procurement concepts based on Green Pages to better connect regional companies with major buyers (conference, online sourcing tool, etc).	No	
	2020 Objective 5 Retrofit Existing Buildings			No	
		Strategy 1. Retrofit 200,000 (25%) of all Existing Homes in the Region by 2020		No	
			1. Aggressively promote and expand Residential Rebate Programs, such as SMUD HOME Performance, PG&E Energy Watch Partnerships and Energy Upgrade California.	No	
			2. Promote and expand existing utility incentive programs, such as Savings by Design and SMUD SolarSmart Homes to incentivize projects that exceed Title 24 Energy efficiency standards and deploy renewable energy project features.	Yes	
		Strategy 2: Ensure that Affordable and Public Housing are Included in all Green Residential Building and Retrofit Strategies		Yes	
			1. Coordinate with the Green Affordable Housing Coalition (GAHC) to ensure compatibility and consistency.	Yes	
			2. Coordinate with the Green Rental Housing Energy Efficiency Network (GREEN).	No	
			3. Coordinate with the State Treasurer's Tax Credit Allocation Committee (TCAC) for compatibility and consistency with proposed sustainability tax credit measure provisions.	No	
		Strategy 3: Retrofit 25 Million Square Feet of Office and Commercial Space (25%) by 2020		No	
			1. Aggressively promote and expand Commercial Rebate Programs through the local electric, water and wastewater utilities.	No	
			2. Increase awareness of financing options for energy efficiency retrofits by creating a comprehensive resource for different financing options for commercial energy and water efficiency retrofits. Catalog the cost, benefits and savings associated with the upgrades.	No	
			3. By aligning with AB 1103, local city and county agencies will ensure that energy disclosure information that is provided to the Portfolio Manager is also made available to the general public.	No	
			4. Create a model "Green Lease Tool Kit" program that educates both building owners and tenants about the benefits associated with energy & water efficient buildings and how to properly operate them.	No	
			5. Comply with AB 758 if the California Energy Commission (CEC) and the State require energy audits for all existing buildings. Mandatory requirements may be included in the CEC's later phases of regulation.	No	
			6. Create bonus incentives for green building projects such as density bonuses, parking waivers, etc. that encourage and reward projects that voluntarily achieve high performing green building standards.	Yes	
		Strategy 4: Retrofit 15 million square feet (25% of School Facilities) of K-12 Schools and College Facilities by 2020 (signature project)		No	
			1. Identify a pilot school district to conduct energy and water audits for school facilities. Create a template to be used by school superintendents and facilities managers to audit their school campuses.	No	
			2. Create a Greenwise Joint Powers Authority (JPA) to create a regional, self-funding energy and water efficiency financing program for school districts and colleges. Initial goal is a fund of $100 million.	No	
			3. Educate regional school boards about the benefits of energy and water efficiency retrofits. Encourage school districts to use bond proceeds for this investment.	No	
	2020 Objective 6 Streamline Permitting			No	
		Strategy :1 Improve the Permitting Process for Energy Efficiency and Renewable Energy Projects		No	
			1. Identify all energy efficiency, renewable energy, and charging station projects that require a permit.	No	
			2. Identify all barriers to getting the permit, inspection, and finalization of the permit completed in a timely manner.	No	
			3. Identify opportunities to standardize the permit applications.	No	
			4. Develop submittal templates for energy-related projects that can be adopted by all jurisdictions.	No	
			5. Conduct a fee cost study to determine appropriate fees for small-scale, energy-related permits for projects within the region.	No	
			6. Consider the prioritization of these projects for permits.	No	
			7. Have all jurisdictions clearly and consistently identify and post information to their websites on how to get a permit for small-scale energy-related projects.	No	

GOAL	Objective	Strategy	Action		
		Strategy 2: Adopt Regionally Consistent Reach Codes or Green Building Certification		Yes	
			1. Promote and encourage LEED, Green Point Rated, and other third party green building ratings for private and public development projects.	No	
			2. Apply CalGreen and/or other green building ordinances consistently throughout the region	No	
			3. Begin enforcing baseline CALGreen in 2011.	Yes	
			4. Implement all CalGreen Tier 1 measures (or third party equivalent rating system measures) required across region by 2013.	Yes	
			5. Review and update existing zoning codes, development standards, building codes and other policies to remove barriers relating to implementation of green building techniques.	No	
			6. Create regionally consistent and practical Low Impact Development Standards, remove barriers to implementation through code reform standards that are approved by all agencies.	No	
		Strategy 3: Train Staff		No	
			1. Expand capacity and knowledge of green building practices and standards within local government agencies through green building programs, and/or green building project management.	No	
			2. Conduct ongoing training programs for staff from all city and county departments in the region to promote consistency and networking in the region.	No	
		Strategy 4: Consider Fee Reductions or Expedited Review for Green Building Projects		No	
			1. Explore the possibility of reducing entitlement, plan review, or inspection fees for projects that exceed minimum green building code requirements.	No	
			2. Propose expedited processing that local governments provide for projects that exceed the minimum green building codes.	No	
	2020 Objective 7 Create a Biofuels Industry			No	
		Strategy 1: Pool a Portion of Local Agency Fuel Purchases to Aggregate a Demand for 10 million Gallons of Advanced Liquid Biofuels Per Year		No	
			1. Create a collaborative joint buying task force composed of representatives from city and county fleets, police, sheriff and fire departments, the State of California and the employers in the region with the largest fleets.	No	
			2. Issue an RFP for purchase of advanced liquid biofuels from at least three vendors that meet all ASTM standards for gasoline or diesel, are not produced from food quality raw material and qualify as low-carbon fuels as denoted by the California Air Resources Board at prices equivalent to expected prices for conventional fuels.	No	
			3. Include in the RFP a local purchase preference for vendors willing to establish facilities in this region.	No	
			4. Solicit participation from package delivery companies, ambulance services, utility fleets, farmers and local trucking companies.	No	
			5. Offer permit assistance to any fuel vendors needing to establish local production or storage facilities to meet fuel delivery requirements.	No	
			6. Increase the number of vendors selected to five for biofuels production in region.	No	
		Strategy 2: Establish a One Million Gallon Advanced Liquid Biofuels Production Plant in the Region		No	
			1. In parallel with the advanced biofuels purchasing collaborative, solicit proposals for the construction and operation of a small-scale advanced biofuels production plant in the region.	No	
			2. Provide to potential applicants an inventory of possible sites where permitting would be easiest.	No	
			3. Provide a ten-year purchase contract for the output of the plant to make financing feasible.	No	
2. Become the Greenest Region in the Country - ENVIRONMENT					
	2020 Objective 1 Plant 3 Million Trees			No	
		Strategy 1: Support the Sacramento Tree Foundation Efforts as the Lead Agency in the Region for Tree Planting		No	
			1. Identify and plan in areas with most need for shading e.g. target neighborhoods and corridors without trees.	No	
			2. Engage the Green Corps to volunteer and plant trees throughout the region on community planting days.	No	
			3. Reward and recognize those that contribute the most time and funding to the tree planting effort.	No	
		Strategy 2: Purposefully add Shade Trees to the Urban Canopy		No	
			1. Use the State's "Urban Forest Project Protocol" in the region to create a system of carbon sequestration credits for urban forest development in new and redeveloped communities.	No	
			2. Continue air quality district support for tree planting to reduce ozone in the region.	No	
	2020 Objective 2 Reduce, Reuse and Recycle 85% of the Region's Waste			No	
		Strategy 1: Divert 100% of Organics from the Region's Landfills		No	
			1. Build three Anaerobic Digestion Facilities.	No	
			2. Convene stakeholders to address issues and achieve agreement on construction of high-temperature facilities in the region.	No	
			3. Based on outcome of stakeholder group, construct up to three high-temperature facilities to accommodate all post-recycled dry organic waste in the region.	No	
		Strategy 2: Expand the List of Recyclables not Allowed in Landfills		No	

GOAL	Objective	Strategy	Action		
			1. Review waste characterizations and prioritize materials not allowed for disposal based on current processing infrastructure availability and percentage disposed.	No	
			2. Expand ordinances in the Solid Waste Authority, City of Sacramento, and neighboring jurisdictions to prohibit certain materials from landfill disposal.	No	
			3. Establish a public outreach campaign to educate residents and businesses of items not allowed in landfills and resources for recycling materials.	No	
			4. Increase compliance efforts to assure that waste generators are following requirements for not disposing materials prohibited from landfill disposal.	No	
		Strategy 3: Reduce Packaging Generation by 30% through Application of "Greenwise Packaging Scorecard"		No	
			1. Develop a packaging scorecard and measurement indices based on existing models. Provide model language for procurement policies, regulations, contracts and purchase orders.	No	
			2. Apply Scorecard to Procurement Standards packaging and roll out program to 30 companies in 2011.	No	
			3. Meet with businesses and governments to educate staff on procurement policy practices and language. Train staff and provide implementation assistance.	No	
			4. Expand polystyrene processing.	No	
		Strategy 4: Adopt Public Event Vendor Standards to Reduce Waste Generated		No	
			1. Develop model vendor standards.	No	
			2. Determine list of markets and audiences (public and private events).	No	
			3. Develop messaging, talking points, marketing collateral and website.	No	
			4. Engage markets in collateral and reeducation of model vendor standards.	No	
		Strategy 5: Form a Solid Waste Joint Powers Authority (JPA) over Disposal, Recycling and Waste-to-Energy		No	
			1. Convene leaders of regional and municipal solid waste service providers.	No	
			2. Inventory facilities within the region and identify needs to address present and future waste streams.	No	
			3. Identify the potential for expansion and retrofits for new technology at existing facilities versus construction of new facilities.	No	
			4. Coordinate generation of materials and products where materials are consumed.	No	
			5. Develop a Regional Resource Recovery Facility by 2015, publicly or privately-owned at an existing site.	No	
			6. Develop a Regional Waste-to-Energy Master Plan and set of supporting policies.	No	
			7. Expand the role of existing solid waste authorities to serve as regional facilities.	No	
			8. Schedule workshops with elected officials and interested parties.	No	
			9. Finalize the scope and structure of the Solid Waste JPA, seek members and begin operations.	No	
		Strategy 6: Establish Local Extended Producer Responsibility Ordinances		No	
			1. Sacramento Regional Solid Waste Authority will develop extended producer responsibility ordinances that would require manufacturers, distributors and retailers to establish recycling programs for problem waste such as pharmaceutical, medical sharps, point, and mercury containing devices.	No	
			2. The Sacramento Regional Solid Waste Authority will work with the other regional waste authorities and municipal utilities to adopt ordinances to ensure regional consistency.	No	
	2020 Objective 3: Reduce Water Use in the Region by 20%			Yes	
		Strategy 1: Complete Installation of Water Meters and Billing for Actual Usage (volumetric rates) on all Residential Connections by 2020		No	
			1. Continue installation of water meters by the water agencies serving the Sacramento region to comply with state and federal requirements.	No	
			2. Seek federal and state funding to accelerate the installation of water meters, especially in areas where water usage is highest and where the target installation dates may not be met due to lack of resources.	No	
		Strategy 2: Comply with Water Forum Agreement Conservation Element and California Urban Water Conservation Council		Yes	
			1. Expand education program for regional water purveyors to educate public and school children on water conservation.	No	
			2. Secure grant funding to enhance rebate programs like toilet retrofits, landscape modifications, and conservation devices.	Yes	
			3. Develop a regional approach to applying drought stages and planning for drought conditions.	No	
		Strategy 3: Provide a Volume of Recycled Water for Beneficial Use Equivalent to 10% of Total Municipal and Industrial Use in the Region		Yes	
			1. Identify potential opportunities for expanding recycled water use in urban and agricultural areas and in industrial applications.	Yes	
			2. Reduce the Total Maximum Daily Loads of chemical constituents of primary concern by decreasing effluent releases from wastewater treatment plants to receiving waters. This includes providing recycled water to urban and agricultural uses where use of the water is permitted by state and federal regulatory agencies.	Yes	
			3. Seek funding necessary to build the infrastructure to convey recycled water to customers.	Yes	
			4. Utilize recycled water on regional parks and golf courses where recycled water is available.	Yes	
		Strategy 4: Expand the Conjunctive Use Program in the Region to Better Manage both Surface and Groundwater Supplies to Increase Water Supply Reliability for the Region		No	
			1. Expand groundwater banking by water purveyors through direct injection or in-lieu recharge.	No	
			2. Utilize conserved water in the region to bolster the conjunctive use program.	Yes	
			3. Look for opportunities to interconnect water purveyor's distribution systems to enhance conjunctive use in the region.	No	

GOAL	Objective	Strategy	Action		
	2020 Objective 4 Reduce Per Capita Energy Use by 15%			Yes	
		Strategy 1: Reduce Electricity and Natural Gas Usage by 15% per Capita		Yes	
			1. Benchmark existing programs in the region that reduce energy consumption.	No	
			2. Develop/expand and implement programs that reduce energy consumption.	Yes	
			3. Target high energy users like data centers, senior housing, food processors, large employment centers, and restaurants.	No	
		Strategy 2: Make the Region a Showcase for Smart Meter Communications		No	
			1. Identify three different projects for demonstration purposes that can be permitted and built by 2013.	No	
			2. Build a smart home demonstration facility.	No	
	2020 Objective 5 Design all New Planned Communities with "20 Minute Neighborhood" Principles			Yes	
		Strategy 1: Building on the Success of the Sacramento Blueprint by creating and implementing a Regional Sustainable Communities Strategy per SB 375		Yes	
			1. Complete an update to the Metropolitan Transportation Plan (MTP) and adopt the Sustainable Communities Strategy in 2011.	No	
			2. Update local general plans and zoning codes to remove barriers to sustainable development and ensure consistency with the Sustainable Communities Initiative.	Yes	
			3. Develop model "green" zoning/development code that integrates sustainable development and green building.	Yes	
			4. Fully activate the SB 375 CEQA Streamlining benefits with regional guidelines and consistency.	No	
			5. Create a "20-minute neighborhood" walkability index for the region that scores neighborhoods based on distance, density, diversity, design, etc.	No	
			6. Create an online mapping application providing a search tool for 20-minute access to needed services.	No	
		Strategy 2: Target Infill Areas Throughout the Region Including Town Centers, Aareas Around Transit Stations, Redevelopment Areas and Other Target Infill Areas for Regional Growth		Yes	
			1. Create zero-net energy, mixed use, low-impact developments in strategic locations including the railyards, Township 9, Stonebridge and others with a focus on areas accessible to transit.	Yes	
			2. Pilot walkable communities in Rocklin and Rancho Cordova.	No	
			3. Expand location efficient lending practices, utilizing Location-Efficient Mortgages. Combine this with education and building awareness to encourage buyers to purchase in infill areas.	No	
	2020 Objective 6 Increase the Percentage of all Trips Taken by Walking, Biking or Transit by 30%			Yes	
		Strategy 1: Significantly Expand Funding Opportunities for Pedestrian, Bicycle and Transportation Demand Strategies		Yes	
			1. Implement the measures in the 2009-2010 MTP and include additional measures in the 2035 MTP to be approved by the Sacramento Area Council of Governments in 2012.	No	
			2. Seek federal and state grants for all types of alternative transportation in the Sacramento region.	No	
			3. Work with private developers to incorporate infrastructure for alternative transportation into building design and property development. This will include design standards for complete streets in new and existing roadways that safely accommodate all users.	Yes	
		Strategy 2: Create and Expand Programs to Provide Increased Mobility Choice		Yes	
			1. Optimize routing of the region's transit systems to maximize the benefits to riders.	No	
			2. Create bike sharing and car sharing pilot programs.	Yes	
			3. Expand "Safe Routes to School" Programs and funding throughout the region.	No	
		Strategy 3: Advocate for Additional Transit and High Speed Rail Funding		No	
			1. Close critical near-term funding gaps.	No	
			2. Ensure the MTP includes adequate transit funding consistent with the Sustainable Communities Initiative.	No	
			3. Support the regional transit systems bids to fund additional capacity.	No	
			4. Fund light rail extension to Sacramento Airport.	No	
			5. Continue to advocate for funding to extend the California High Speed Rail system to downtown Sacramento.	No	
	2020 Objective 7 Reduce Pollution Levels by 20%			Yes	
		Strategy 1: Make the Sacramento Region the Energy Efficient Leader for Emission-free, Non- Fossil Energy and Technology by 2020		Yes	
			1. Create a bid preference for locally produced power and energy (electric, gas, lowcarbon transportation fuels) that reflect both monetary and non-monetary value.	No	
			2. Create the infrastructure for, and increase the number of, alternative fueling stations.	No	
			3. Develop cogeneration projects.	No	
		Strategy 2: Prepare and Submit the 2012 and 2013 Federal Air Plans		No	
			1. Comply with all local, state and federal air quality rules and regulations.	Yes	
			2. Include mitigation measures that reduce ozone and particulate matter in the Sacramento region.	Yes	
			3. Work with EPA to quantify actions in the Greenwise program to reduce regional emission reduction requirements for meeting Federal Ozone and Particulate standards.	Yes	
		Strategy 3: Meet Federal Ozone and Particulate Standards		No	

GOAL	Objective	Strategy	Action		
			1. Comply with local, state and federal air quality rules and standards.	No	
			2. Continue and expand regional incentive programs for replacing older diesel engines with cleaner technologies by gaining reauthorization of the Carl Moyer Air Quality Standards Attainment Program and accessing other funding mechanisms.	No	
			3. Significantly increase funding for regional wood stove retrofit incentive programs.	No	
			4. Work with EPA to quantify national rulemaking and regulatory efforts that can be leveraged by the region to reduce regional emission targets for meeting federal standards.	No	
		Strategy 4: Facilitate the Broad Adoption of Electric Vehicles in the Marketplace		Yes	
			1. Increase the number of electric vehicles sold in the region to 10% of all vehicles.	Yes	
			2. Transfer/enhance rebate money from efficiency programs to electric vehicle readiness and vehicle acquisition.	No	
			3. Create integration between new electricity resources and electric vehicles.	No	
			4. Identify a network of connected 35 mph designated streets to encourage use of lowspeed neighborhood electric vehicles (NEV's).	No	
			5. Be engaged in state-wide strategic planning efforts focused on electric vehicles (through the Electric Vehicle Collaborative at UC Davis).	No	
			6. Identify and address the necessary policy changes at the local government level.	Yes	
			7. Work with business organizations and local government to address infrastructure requirements.	No	
2. Brand the Region as the Emerald Valley – ENGAGEMENT					
	2020 Objective 1 Create Greenwise Engagement Campaigns			No	
		Strategy 1: Create a Greenwise Sacramento Website		No	
			1. Website content update frequently with regular updates, one-stop resources with links for target audiences and funding opportunities.	No	
			2. Post success stories and reward Green Energy Pioneers and Champion of Change, a program for local companies to name a sustainability hero.	Yes	
		Strategy 2: Create a Corporate Engagement Campaign		No	
			1. Partner with the Business Environmental Resource Center (BERC) Sacramento to make the program more visible, accessible and regional.	No	
			2. Improve connections to business organizations and sustainability efforts through the region's chambers of commerce and Greenwise.	Yes	
			3. Develop a format for education and networking that fits the needs of the audience (multi-lingual, onsite and online learning).	No	
		Strategy 3: Celebrate Achievements at an Annual "Greenwise Gala" to Publicize Success Stories and Motivate Participants		No	
			1. Create a "Gala Committee" from leadership councils and challenge councils plus other volunteers.	No	
			2. Set first Gala for Spring 2012.	No	
			3. Produce and show a video of Greenwise achievements of the past year.	No	
			4. Recognize sponsors.	No	
			5. Recognize "Best Project", "Best Greenwise Company", "Best New Company", "Best Innovation," and other awards.	No	
		Strategy 4: Increase the Awareness of Energy Usage in Everyday Activities		No	
			1. Measure energy intensity for the entire region and publish in the daily paper.	No	
			2. Provide energy monitoring to customers through smart meter applications.	No	
			3. Publish energy data by neighborhoods that allows neighborhood energy efficiency comparisson.	No	
			4. Engage major employers to hold seminars and education employees on energy efficiency.	No	
		Strategy 5: Develop and Iconic Demonstration Project that Incorporates Zoning for Green Zones and combined Heating/Co-generation Energy Systems		No	
			1. Benchmark and document best practices from existing demonstration projects (for example, Davis' West Village).	No	
			2. Develop a template ordinance and adopt regional policies to evaluate significant projects for incorporation of green principles and strategies like on-site distributed energy generation.	Yes	
			3. Create local Zero-Net Energy neighborhoods.	Yes	
		Strategy 6: Engage the Youth of the Community		No	
			1. Conduct song, video and design contests for Greenwise Sacramento promotional and awareness campaigns.	No	
			2. Build the Green IQ of the region by developing learning incubators during school energy retrofits – included in learning curriculum, which will expose energy efficiency measures to students, parents and teachers.	No	
			3. Mobilize schools to do green projects through organizations like Alliance for Climate Education.	No	
			4. Create a community outreach program at the schools to aid in developing Greenwise into a leadership position for energy savings and build a green pathway for area students to enter the green workforce.	No	
			5. Promote Greenwise through the Sacramento Bee educational supplement.	No	
		Strategy 7: Expand Green Building Practices and Stimulate Market Demand through Innovative Education and Marketing Approaches		No	
			1. Create Homeowner "Did you Know" Checklists. Distribute through permit applications and at public informational kiosks.	No	

GOAL	Objective	Strategy	Action		
			2. Launch a Green Building Recognition Program that annually recognizes and celebrates projects that achieve LEED or GPR certification and CALGreen Tier 1 or Tier 2 status.	Yes	
			3. Green the Multiple Listing Service, consistent with the National Association of Realtors recommendations, by adding data fields that enable realtors to inform buyers about energy, water efficiency features and applicable home energy or green ratings.	No	
			4. Create a green home logo or symbol that can be attached to real estate signs to brand the home as green.	No	
			5. Create a Green Building Professionals Guild in partnership with Build It Green to support contractor education about green building techniques, products and resources.	No	
		Strategy 8: Enroll 100 companies in an Educational Reuse Program		No	
			1. Secure funding and a repository for the program which sorts materials and donates to nonprofits.	No	
			2. Conduct waste audits for participating businesses and members participate in Waste Education Program.	No	
			3. Monthly pick-up is arranged for business with value of all materials donated 1oo% tax deductible.	No	
		Strategy 9: Create Public Engagement Campaign for Packaging Reduction in the Region		No	
			1. Include in the Greenwise website a section for feedback and results on packaging reduction.	No	
			2. Conduct campaigns to reduce top three packaging products (paper/cardboard, Styrofoam, and plastics) that typically end up in landfills.	No	
			3. Form a Regional Solid Waste Cooperative on Universal Source Reduction Marketing.	No	
		Strategy 10: Develop a Local Waste-to-Energy demonstration project		No	
			1. Identify local sites and sources for waste generation (yard waste collection)	No	
			2. Issue an RFP for a company to operate waste-to-energy facility in the region and specify the facility will be a demonstration project for learning as well as energy production	No	
	2020 Objective 2 Implement a Series of Greenwise Sacramento Challenges			Yes	
		Strategy 1: Develop a List of Challenges		Yes	
			1. Establish a Greenwise Sacramento Challenge Leadership Group composed of community leaders.	No	
			2. Seek suggestions for challenges and pick six to execute in first year. Challenges to include upgrading energy efficiency in neighborhoods, extending bike trails, replacing incandescent light bulbs.	Yes	
			3. Seek sponsors for Challenges selected.	No	
		Strategy 2: Execute an Initial Challenge - Plant Community and School Gardens		No	
			1. Generate a list of vacant lots throughout the region for potential community gardens.	No	
			2. Create a training program for the region's youth to learn gardening and food production.	No	
			3. Implement code changes to allow community gardens and farming districts.	No	
	2020 Objective 3 Establish a Greenwise Business Leadership Council			No	
		Strategy 1: Launch the Greenwise Leadership Council in 2011		No	
			1. Invite the senior leadership of business, labor, academic institutions, government and nonprofits to convene and collaborate on a regular basis.	No	
			2. Initial action will be to determine the roles and responsibilities, member expectations, and objectives from the Greenwise Sacramento Regional Action Plan to be led or supported by the Council.	No	
			3. Advocacy by this group to support social justice initiatives and innovative policy will be an initial agenda item.	No	
		Strategy 2: Conduct Monthly Greenwise Business Leadership Council Symposiums		No	
			1. Host a series of symposiums with speaking invitations extended to thought leaders in the region and around the world. The purpose of the symposiums is to continue the dialogue begun by the Greenwise Sacramento Initiative monthly meetings and to continue learning from experts and advisors who will inspire and challenge the region to continue this important work.	No	
			2. Spotlight the Greenwise marketing and public relations campaigns necessary to brand the region.	No	
	2020 Objective 4 Certify 10,000 Businesses as "Greenwise Businesses"			No	
		Strategy 1: Create Pilot Projects that Focus on "Greening" Specific Types of Industries in the Region that Represent a Large Portion of the Employment Base, Like Health Care		No	
			1. Identify best industry partners (health care, education, government, professional services).	No	
			2. Secure expert support on corporate greening from in-region organizations and businesses throughout the country.	No	
			3. Partner with the Greenwise Business Advisory Council to set goals, build learning networks, and implement new actions that directly result in reduced emissions, conservation of resources, and cost savings to the business community.	No	
			4. Promote our success stories.	No	
		Strategy 2: Develop an Annual Event to Recognize Corporate Sustainability		No	
			1. Forge linkages with related existing programs and events – BERC awards, Metro Chamber State of the Region, Innovate or others.	No	

GOAL	Objective	Strategy	Action		
			2. Establish a committee of the Greenwise Business Leadership Council to draft categories, determine criteria, and set the timeframe for the annual event.	No	
	2020 Objective 5 Establish a Sacramento Greenworks Program			No	
		Strategy 1: Launch a Sacramento Greenworks "Clean Energy Works: Sacramento" Pilot Program in 2011 to Ensure that High-Quality Employment and Access to Those in the Community Who Have Been Historically Left		No	
			1. Establish a Sacramento Greenworks Task Force with members from the Office of the Sacramento Mayor, the Sacramento Unified School District, Green for All, General Electric, the USGBC, SMUD, local chambers of commerce, and regional labor representatives.	No	
			2. Create a program to retrofit school buildings with existing bond funds. The work will be performed by local, disadvantaged workers and companies that employ them.	No	
			3. Expand opportunities for residents and businesses, especially in underserved areas to learn how to track and manage energy use.	No	
		Strategy 2: Expand the Sacramento Greenworks program to be region-wide with significant outcomes for the disadvantaged in the Sacramento region.		No	
			1. Continue to seek federal, state, regional, and private resources to retrofit public and private buildings in Sacramento.	Yes	
			2. Establish a program that provides low-interest financing to improve the efficiency of area homes. The loan is repaid through a financing mechanism established through Sacramento Greenworks, either on the utility bill or property tax assessment.	Yes	
			3. Set Green Jobs goals to hire from the local work force, with a percentage from disadvantaged populations at a living wage, who have been trained locally.	Yes	
			4. Track the employment figures and report on the program success as part of the annual Greenwise Sacramento report.	No	
	2020 Objective 6 Create a Greenwise Sacramento Marketing Plan & Campaign			No	
		Strategy 1: Brand the Region Internally through a Visible, Ongoing Greenwise Campaign		No	
			1. Post Greenwise goals and accomplishments at airport, billboard/digital signs, print advertisements.	No	
			2. Use social media as a call to action.	No	
			3. Promote the region's competitive advantages.	No	
		Strategy 2: Establish a regional Greenwise Dashboard to Measure Progress in Targeted Areas		No	
			1. Establish performance metrics related to strategy areas.	No	
			2. Develop a dashboard and regular schedule for updating the content.	No	
			3. Publish an annual Greenwise report with implementation progress.	No	
	2020 Objective 7 Lead by Example at the Local Government Level			No	
		Strategy 1: Develop a Regional Governmental Clean Tech Master Plan to Incentivize Clean Tech Clusters		No	
			1. Inventory current incentives and identify gaps.	No	
			2. Create clean tech Enterprise Zones.	No	
			3. Link redevelopment activities to clean tech business support opportunities.	No	
			4. Identify new incentives, policies, and support services needed to attract and retain clean tech businesses.	No	
		Strategy 2: Improve the Energy and Water Efficiency of Existing Municipal Buildings		No	
			1. Inventory energy usage at all municipal facilities and establish a multi-phased approach to retrofitting.	No	
			2. Identify Phase I for retrofits and complete a detailed life cycle cost analysis for each energy saving measure.	No	
			3. Identify financing for the improvements some opportunities include the California Energy Commission's 3% loan program or local bank financing. Use the energy savings to pay back the loans.	No	
		Strategy 3: Implement Local Purchasing Policies		No	
			1. Inventory municipal purchases.	No	
			2. Identify opportunities to purchase these items locally.	No	
			3. Set up the local processes to make local purchases convenient for all departments.	No	
			4. Research the possibility of local preference points for public projects and implement where feasible.	No	
			5. Research the possibilities of local hiring agreements.	No	
		Strategy 4: Implement a Regional Commercial PACE Program		No	
			1. City of Sacramento will develop a solicitation for a third party program administrator and financer.	No	
			2. Other jurisdictions should consider using the same third party for consistency in program requirements across the region.	No	
			3. If a responsive and responsible proposal is submitted, adopt local resolutions to establish the financing district.	No	
			4. Work with the third party firm to market and educate commercial building owners about the program.	No	
		Strategy 5: Become Early Adopters of Emerging Technologies		Yes	
			1. Convene sustainability program managers and local emerging technology developers to identify opportunities.	No	

GOAL	Objective	Strategy	Action		
			2. Convene sustainability program managers and California Energy Commission, UC Davis Energy Efficiency Center, UC Davis Lighting Center, UC Davis Water Conservation Center to identify opportunities.	No	
			3. Develop a permit process to expedite the use of emerging technologies in public facilities.	No	
			4. Work with CEC to identify funding to purchase emerging technologies as well as track and monitor the performance of the technologies.	Yes	
				Yes	0

Letter E

WALKSACRAMENTO
Walkable Communities = Communities of Walkers

April 5, 2011

Jennifer Hageman, Senior Planner
City of Sacramento, Development Services Department
300 Richards Boulevard
Sacramento, CA 95811

VIA EMAIL

RE: Draft Environmental Impact Report for the 700 Block of K Street Project

Dear Ms. Hageman:

*WALK*Sacramento appreciates the opportunity to comment on the Draft Environmental Impact Report for the 700 Block of K Street Project. The project proposes to remodel 74,179 square feet of existing floor space and construct 157,395 square feet of new floor space. The remodeled and new construction would provide 63,780 square feet of commercial space and 173,156 square feet of residential space containing 153 dwelling units and 91 parking spaces. E-1

The project could bring 270 new residents and many retail and restaurant patrons to the JKL corridor. The Initial Study found the project has the potential to generate 3,120 walk, bike, and transit trips per day. The proximity of the project location to many destinations, the connectivity of the surrounding street network, and convenient transit choices will provide the new residents with many opportunities for daily active transportation and exercise.

Daily physical activity is important for attaining and maintaining physical and mental fitness. Walking trips in the neighborhood and climbing stairs to the residential units can provide much of the needed activity. Although parks are a destination for walking trips, they're also a path to better health and recreation. Therefore, it's important to provide neighborhood parks to new residents of the project. E-2

The DEIR found the project's impact to parks and open space less than significant based upon the Initial Study finding there would be "No additional significant environmental effect." The project is located in the Central City, where the park acreage is below the General Plan goal of 5 acres per 1000 persons for neighborhood and community parks combined. The 2009 Technical Update of the 2005-2010 Parks and Recreation Master Plan presents an assessment of the park acreage service levels for the ten community planning areas in the city. Table 8 in the Assessment chapter lists the Central City 2008-2009 service performance level toward meeting the 2010 goals as 0.7 and 0.9 acres per 1000 persons for neighborhood and community parks, respectively. E-3

Initial Study Question 8A Result in increased use of existing parks or recreational facilities such that substantial physical deterioration of these facilities could occur E-4

909 12th Street, Suite #122 • Sacramento, CA 95814 • 916-446-9255 • fax 916-443-9255
www.walksacramento.org

E-4 cont.

The Initial Study discussion of this question says a Quimby in-lieu fee payment will provide for acquisition of a new community park site or improvements of existing parks. The General Plan Draft Master EIR states that the analysis uses "2.5 acres per 1,000 population with a service area guideline of 0.5 mile" for neighborhood parks.

The General Plan Final EIR states in a response to a comment, "As development is proposed in the city it will be evaluated to ensure adequate parkland is provided based on the number of residents and type of development proposed or a fee is paid to the city to purchase land for parks." The General Plan Draft EIR states, "Once specific development proposals are prepared and submitted to the city, a project-specific environmental analysis would be prepared to analyze potential impacts on existing park facilities as well as to evaluate proposed new park facilities."

While the 700 Block Project's Quimby fee may be pooled with other resources to purchase the 0.68 acres needed to serve the additional residents, the question remains whether there is vacant land available for purchase and is that land affordable for the Department of Parks and Recreation. The Initial Study presents no documentation that parks and open space has been analyzed sufficiently to determine there is a less than significant impact.

Initial Study Question 8B Create a need for construction or expansion of recreational facilities beyond what was anticipated in the 2030 General Plan

E-5

The discussion in the Initial study of Question 8B states, "The proposed project is consistent with the General Plan and zoning designations assumed for the site in the Master EIR. The project does not propose development that would result in a greater level of impacts to park and recreational facilities than previously analyzed; and therefore, would not result in an individually minor, bur collectively significant project impact."

It does not appear that the impact to parks and recreational facilities has been previously analyzed. The General Plan Master EIR left that analysis to individual projects as they are proposed and we believe that analysis has not been performed for this project.

We request that the EIR provide analysis of the Central City parks inventory and land available for future park site acquisition in order to accurately determine project impacts to parks and recreation. It is important for the public to be aware of the impact to parks facilities as the downtown area receives more residents.

WALKSacramento encourages people to walk and bicycle in their communities. The benefits include improved physical fitness, less motor vehicle traffic congestion, better air quality, and a stronger sense of cohesion and safety in local neighborhoods. WALKSacramento is working to support increased physical activity such as walking and bicycling in local neighborhoods as well as helping to create community environments that support walking and bicycling.

Thank you for your consideration of these comments. If you have questions or need additional information, please contact me at (916) 446-9255 or cholm@walksacramento.org.

Sincerely,

Chris Holm

Project Analyst

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Letter E
Chris Holm, Project Analyst
Walk Sacramento
April 5, 2011

Response to Comment E-1

The comment describes the proposed project. This comment does not raise specific issues related to the adequacy of the Draft EIR and no response is necessary.

Response to Comment E-2

The comment extols the virtues of daily physical activity and the importance of neighborhood parks. This comment does not raise specific issues related to the adequacy of the Draft EIR and no response is necessary.

Response to Comment E-3

The comment summarizes information from the Draft EIR for the proposed project, the General Plan, and the 2009 Update to the Parks and Recreation Master Plan.

This comment does not raise specific issues related to the adequacy of the Draft EIR and no response is necessary.

Response to Comment E-4

The analysis of the need for new or expanded recreational facilities appears on Page 6.9-20 of the Master EIR for the 2030 General Plan. As noted, the analysis determined that the 2030 General Plan policies were designed to ensure that future development in the City would not create the need for the construction or expansion of facilities beyond that anticipated in the General Plan. The policies were created to accommodate the increase in populations anticipated due to development in accordance with the General Plan. Policy ERC 2.2.4 requires new residential development to provide facilities, either through the dedication of land or indirectly through the payment of in-lieu fees. The analysis determined that impacts to recreational facilities due to buildout of the General Plan would be less than significant with implementation of the General Plan policies.

The commentor requested that an inventory of Central City parks and available park land be included in the analysis of potential impacts related to the proposed project at the 700 Block of K Street. Because the analysis of the impacts related to park and recreational facilities is based on the analysis in the Master EIR for the 2030 General Plan, this project does not need to prepare the inventory or amount of available land for parks. The determination was made that the proposed project is consistent with the General Plan designation for the site and the proposed uses would not result in greater impacts to parks than assumed for the site in the General Plan (see Page 7-33 of the Draft EIR, fifth paragraph).

It is City policy that the determination of the necessary parkland and recreational facilities, and timing of such, are through the required City Parks and Recreation Master Plan (General Plan Policy ERC 2.2.1). Per Policy ERC 2.2.4, individual projects use Table ERC 1 (Page 2-253 of the General Plan) to determine the land dedication, in-lieu fees, or other contribution for the acquisition and development of facilities and parks.

The comment does not result in additional analysis of the issue and no revisions to the Draft EIR are necessary.

Response to Comment E-5

The comment describes the mission of Walk Sacramento. This comment does not raise specific issues related to the adequacy of the Draft EIR and no response is necessary.

Letter F

SACRAMENTO AREA
BICYCLE ADVOCATES

909 12th Street Suite 116 ▪ Sacramento CA 95814 ▪ (916) 444-6600 ▪ www.sacbike.org

March 20, 2011

Jennifer Hageman, Senior Planner
City of Sacramento, Development Services Department
300 Richards Boulevard
Sacramento, CA 95811

Subject: Draft EIR on 700 Block of K Street Project

Dear Ms. Hageman:

This letter provides comments on the Draft Environmental Impact Report (DEIR) for the subject project. We appreciate the opportunity to comment on the DEIR. F-1

The project description provided in the DEIR makes no mention of the project providing bicycle parking, either long-term for employees and residents or short-term for customers and visitors. Therefore, we believe the project "fails to adequately provide access by bicycle," one of the DEIR's standards of significance for identifying significant transportation impacts. Provision of safe and secure bicycle parking is fundamental to providing adequate bicycle access to the project, its 153 dwelling units, and its nearly 64,000 sq ft of commercial space. F-2

We recommend that the City apply the bicycle parking standards of the Association of Pedestrian and Bicycle Professionals' *Bicycle Parking Guidelines* (www.apbp.org). According to those guidelines, the proposed project should provide at least 12 long-term bicycle parking spaces for residents and employees and at least 13 short-term spaces for customers and visitors. We request that in association with the long-term parking the project provide showers, lockers, and changing rooms for employee bike commuters.

Thank you for the opportunity to comment on the DEIR.

Sincerely,

Jordan Lang
Project Assistant

Letter F
Jordan Lang, Project Assistant
Sacramento Area Bicycle Advocates (SABA)
March 20, 2011

Response to Comment F-1

The comment is an introductory paragraph. The comment does not raise specific issues related to the adequacy of the Draft EIR and no response is necessary.

Response to Comment F-2

As noted on Page 7-43 of the Draft EIR, the thresholds to determine significant impacts to bicycle facilities is whether a project would fail to adequately provide for access by bicycle. Page 7-46 of the Draft EIR states the existing on-street bikeways in the project vicinity that could provide access to the site.

The provision of bicycle parking spaces is required for new residential development within the City. See the table below for the calculation of the number of parking spaces that would be required of the proposed project.

Bicycle Parking Spaces*		
Total Required Vehicle Parking	**Required Bicycle Parking**	**Proposed Bicycle Parking**
146 spaces**	15 minimum	15 +
*One bicycle facility is required for every 10 parking spaces required. Fifty percent of the required bicycle parking has to be Class I facilities and the remaining facilities may be Class I, II, or III. A Class I bicycle parking is an enclosed box or designated room with a secured entry and stationary racks. Class II facilities include a stationary rack that secures both the frame and both wheels of the bicycle and the user supplies only a padlock. Class III facilities include a stationary rack that secures only the front wheel of the bicycle and the user supplies both a padlock and cable. **The minimum number of bicycle parking facilities is based on the number of required vehicle parking spaces prior to consideration of any parking reduction measures. The project requests a waiver to reduce the number of parking spaces from 146 to 84; therefore, a minimum of 15 bicycle parking spaces would be required.		

As indicated above, the project would exceed the residential bicycle parking requirements. Commercial development is not required to provide bicycle parking facilities; however, the K Street Mall Streetscape Plan, an approved project separate from the proposed project, includes the installation of bicycle racks on the portion of K Street fronting the proposed project.

Because of the required bicycle parking facilities for the residential uses and the previously-approved parking for the non-residential uses along K Street, parking facilities for both long-term employees and short-term visitors to the site would be provided.

The City does not have a policy to require showers, lockers, and changing rooms for bicycle commuters in retail and restaurant uses.

For these reasons, no revisions to the Draft EIR are necessary.

CHAPTER 4: MITIGATION MONITORING PLAN

Chapter 4 — *Mitigation Monitoring Plan*

Section 21081.6 of the Public Resources Code requires reporting on, monitoring of, mitigation measures adopted as part of the environmental review process. This Mitigation Monitoring Plan (MMP) is designed to aid the City in its implementation and monitoring of mitigation adopted for the 700 Block of K Street project.

The mitigation measures are taken from the 700 Block of K Street Draft EIR, as revised in the Final EIR.

The components of the MMP are:

1. **Impacts**. Each impact is numbered as they appeared in the Draft EIR.

2. **Mitigation Measures**. Each mitigation measure is numbered as they appeared in the Draft EIR. Any revisions to the text of a mitigation measure, as shown in Chapter 2 of this Final EIR, are included in this MMP.

3. **Implementing Party**. Identifies the entity that will be responsible for implementing the mitigation.

4. **Timing**. Each action must take place prior to the time at which a threshold could be exceeded. Implementation of the action must occur prior to, or during, some part of approval, project design, or construction on an ongoing basis. The timing for each measure is identified.

5. **Verification of Compliance**. Provides an area for verification of compliance.

700 Block of K Street
Mitigation Monitoring Program

Impact	Mitigation Measure	Implementing Party	Timing	Verification of Compliance
4.1 Cultural Resources				
Impact 4.1-1 Implementation of the 700 K Street project could cause a substantial change in the significance of historical resources (700, 716, and 726 K Street and historic alley facades) as defined in CEQA Guidelines Section 15064.5.	*MM 4.1-1* *(a) The following resources shall be removed and/or protected prior to any demolition or construction activities that could result in loss or damage. A demolition plan shall be reviewed and approved by the City's Preservation Director prior to construction. The resources shall be rehabilitated or reinstalled in locations approved by the City's Preservation Director.* • *700 K Street: Interior multi-level volume of space alongside the arched windows on the west wall of the structure.* • *Historic Alley Facades: rear wall of 712/ 714 K Street. In addition to the wall's re-installation at a new location, provide interpretation on-site of the historic 19th century alley district elements that are to be demolished. The interpretation shall include a permanent metal exhibit incorporating historic and current photographs and descriptions of all the 19th century alley facade district's features and their history. The exhibit's design and locations shall be approved by the City's Preservation Director.*	Contractor and City's Preservation Director	Prior to any demolition or construction activities.	
	(b) 716 K: Prior to submittal for building permits on this building, detailed design plans and elevations for the building's K Street entry and façade will be submitted for review and approval by the Preservation Director such that original materials and character-defining features will be retained and rehabilitated, and the missing original projecting bay will be reconstructed, in accordance with the Secretary of the Interior's Standards for Rehabilitation and for Reconstruction respectively.	Contractor and City's Preservation Director	Prior to submittal for building permits	
	(c) 726 K: Prior to submittal for building permits on this building, design plans and elevations for the building's K Street entry and façade will be submitted for review and approval by the Preservation Director such that original materials and character-defining features will be retained and rehabilitated in accordance with the Secretary of the Interior's Standards for Rehabilitation, and that any additions or new construction at the façade or entry area will be designed in accordance with the Secretary of the Interior's Standards for Rehabilitation.	Contractor and City's Preservation Director	Prior to submittal for building permits	

Impact 4.1-2 Implementation of the 700 K Street project could cause a substantial change in the significance of historical resources (hollow sidewalks) as defined in CEQA Guidelines Section 15064.5.	*MM 4.1-2 If there are no feasible means of preserving the necessary character defining features of the resource, as part of the Disposition and Development or other activity that could adversely affect a feature of a hollow sidewalk, the applicant shall work with the City Preservation Director to determine an appropriate mitigation fee to cover the cost of preserving the same length of hollow sidewalk in a different location, based on the existing condition of the hollow sidewalks along K Street and the applicable Secretary of Interior Standards for the preservation of such resource. This fee must be paid before permits for demolition and/or construction are issued. The mitigation fee may consist of a contribution to a City Preservation Fund, as established by the City Council as grant provider for historic buildings.*	Applicant and City's Preservation Director	Part of the DDA	
Impact 4.1-3 Implementation of the 700 K Street project could cause a substantial change in the significance of an archeological resource as defined in CEQA Guidelines Section 15064.5.	*MM 4.1-3 The following shall apply to any ground disturbing activities associated with development of the project.* *a. Prior to any excavation, grading or other construction on the project site, and in consultation with Native American Tribes and the City's Preservation Director: a qualified archaeologist will prepare a testing plan for testing areas proposed for excavation or any other ground-disturbing activities as part of the project, which plan shall be approved by the City's Preservation Director. Testing in accordance with that plan will then ensue by the qualified archaeologist, who will prepare a report on findings, and an evaluation of those findings, from those tests and present that report to the City's Preservation Director. Should any findings be considered as potentially significant, further archaeological investigations shall ensue as approved by the Preservation Director, by the qualified archaeologist, and the archaeologist shall prepare reports on those investigations and evaluations relative to eligibility of the findings to the Sacramento, California or National Registers of Historic Places and submit that report to the City's Preservation Director, State Historic Preservation Officer, and appropriate Native American Tribal representative/s if applicable, with recommendations for treatment, disposition, or reburials of significant findings, as appropriate. Also, at the conclusion of the pre-construction testing, evaluation and reports and recommendations, a decision will be made by the City's Preservation Director, based upon the findings of the reports, as to whether on-site monitoring during any project-related excavation or ground-disturbing activities by a qualified archaeologist will be required.* *b. Discoveries during construction: For those projects where no on-site archaeological monitoring was required, in the event that any historic or prehistoric subsurface archeological*	Contractor	Prior to any excavation, grading, or other construction	

	features or deposits, including locally darkened soil ("midden"), that could conceal cultural deposits, animal bone, obsidian and/or mortars are discovered during construction-related earth-moving activities, all work within 50 meters of the resources shall be halted, and a qualified archeologist will be consulted to assess the significance of the find. Archeological test excavations shall be conducted by a qualified archeologist to aid in determining the nature and integrity of the find. If the find is determined to be significant by the qualified archeologist, representatives of the City, including the City's Preservation Director, and the qualified archeologist shall coordinate to determine the appropriate course of action. All significant cultural materials recovered shall be subject to scientific analysis and professional museum curation, or reburial in accordance with Tribal consultations if required. A report shall be prepared by the qualified archeologist according to current professional standards. *c. If a Native American site is discovered, the evaluation process shall include consultation with the appropriate Native American representatives.* *d. If Native American archeological, ethnographic, or spiritual resources are involved, all identification and treatment shall be conducted by qualified archeologists, who are certified by the Society of Professional Archeologists (SOPA) and/or meet the federal standards as stated in the Code of Federal Regulations (36 CFR 61), and Native American representatives, who are approved by the local Native American community as scholars of the cultural traditions.* *e. In the event that no such Native American is available, persons who represent tribal governments and/or organizations in the locale in which resources could be affected shall be consulted. If historic archeological sites are involved, all identified treatment is to be carried out by qualified historical archeologists, who shall meet either Register of Professional Archeologists (RPA), or 36 CFR 61 requirements.* *If a human bone or bone of unknown origin is found during construction, all work shall stop in the vicinity of the find, and the County Coroner, and City's Preservation Director, shall be contacted immediately. If the remains are determined to be Native American, the Coroner shall notify the Native American Heritage Commission, who shall notify the person most likely believed to be a descendant. The most likely descendant shall work with the contractor to develop a program for re-internment of the human remains and any associated artifacts. No additional work is to take place within the immediate vicinity of the find until the identified appropriate actions have taken place. Work can continue on other parts of the project site while the unique archeological resource mitigation takes place.*			

Impact 4.1-4 Implementation of the 700 K Street Block project, in conjunction with other development in the City, could cause a substantial change in the significance of a historic resource as defined in CEQA Guidelines Section 15064.5.	*MM 4.1-4 Implement Mitigation Measure 4.1-1 and Mitigation Measure 4.1-2*	Contractor and City's Preservation Director	Prior to any demolition or construction activities. and Part of the DDA	