Attachment 12-Comment Letters on the Draft Climate Action & Adaptation Plan

Public Review Draft Climate Action & Adaptation Plan Comment Letters

The City received comment letters from the following individuals and organizations, who are listed and displayed here in alphabetical order. Their comment letters are arranged in the same order. Abbreviations for organizations are listed in parentheses and were used in the responses to comments spreadsheet.

350 Sacramento

Anderson, Matt

Citizen's Climate Lobby

Civic Thread

Connor, Charles

Corley, Michael

Crumb, Kay

ECOS

Everett, Joshua

Heller, Laurie

Hess, Ilsa

House Sacramento

Jacques, Karen

Kammerer, Klynton

Kelly, Rev. J. Patrick

King, Matthew

Morrow, David

Munson, Christie

North State Building Industry Association (North State BIA)

Orion, Lynn

Reitano, Francesca

Rosen, Steve

Sacramento Area Bicycle Advocates (SABA)

SacEV

Sacramento Metropolitan Air Quality Management District (SMAQMD)

Sacramento Regional Transit (SacRT)

Sierra Club Sacramento Group

Smith, Angie

Strand, Muriel

Third Act Sacramento

Trees for Sacramento

August 20, 2023

Mayor Steinberg and Sacramento City Councilmembers
Sacramento City Hall
915 I Street, Sacramento CA, 95814

Sent via email to Darrell Steinberg, Mai Vang, Caity Maple, Katie Valenzuela, Karina Talamantes, Lisa Kaplan, Rick Jennings, Sean Loloee, and Eric Guerra

RE: Tue, August 22 City Council Meeting, Agenda Item 18: Climate Action and Adaptation Plan

Dear Mayor and City Councilmembers,

350 Sacramento would like to thank the city for its tremendous effort in putting together this Climate Action & Adaptation Plan. We hope the final adoption of this plan will allow the City Council to prioritize climate action and champion measures that will improve the wellbeing of Sacramento's residents and visitors. It's important to pause and consider what we will gain through these transformative measures, like: making it easier for Sacramentans to walk, bike and ride to their favorite restaurant; reducing electricity bills thanks to expanded tree canopy over homes; allowing neighbors to ride out a hot day in the comfort of their nearby cooling center/library; and more. We want Sacramento to be a vibrant, healthy city and we know that you all truly desire this outcome as well.

Towards this shared goal, we are recommending measures that will make the city's Climate Action and Adaptation Plan even better. These recommendations align with the suggestions 350 Sacramento and other local organizations made on the Preliminary Draft CAAP that was released in July 2022, since this Final Draft reflected few noticeable changes from that version.

In addition to more detailed comments on the specific measures that have been provided to staff, we offer the following overarching comments and priority recommendations. This Tuesday, we ask you to direct staff to include the following in the CAAP:

Planning and Implementation

1. **The city needs an accompanying funding plan**. While the Council has maintained for years that the adoption of the CAAP will open up conversations about funding, we continue to feel this is backwards. Without a more detailed funding plan than what is offered in the CAAP appendix, this plan is purely aspirational words on paper. Bluntly, without money or a

more focused long-term plan about how the city will pursue funding options, it really doesn't matter what the CAAP says.

2. **More accountability measures are needed**. Actual goal dates and interim milestones for measures are few and far between, so the city leaves much of their work up to interpretation. This does not give the public a way to hold the city accountable for failing to meet goals. Additionally, many actions call for passive "support". In 2023, we need to be signaling something stronger than "support" where the city is clearly able to facilitate, implement, or improve. Effective program implementation and reporting requires that all measures be specific and enforceable.

3. **More implementation details are needed.** 350 Sacramento recommends that city staff include the development of a rolling two-to-three-year projected project list with funding sources and deadlines, and a discussion of how the projects are keeping the city on track to meet the 2030 targets.

4. **Improve departmental alignment**. As recommended by the Mayors' Commission on Climate Change, the city should "[a]lign each city department's mission, operating procedures, funding priorities and planning documents with the carbon zero vision." We thank staff for working on parts of this recommendation, but a more formal inclusion of this policy would be welcomed in the CAAP.

Energy and Electrification

5. **Reduce the plan's dependency on SMUD-directed efforts.** Among the Plan's recommendations, the largest component of near-term savings (47%) will come from the difference between the state's renewable power requirements for SMUD (SB 100) and the utility's pledge to achieve zero carbon emissions by 2030. Measure E-1 (Support SMUD as it Implements the 2030 Zero Carbon Plan) should not be included as part of the CAAP's set of recommendations. Instead, the projected savings should be folded in the adjusted GHG forecast as part of the regulatory context.

6. **Add a measure to address embodied carbon in new construction as well as electrification.** The City already has an ordinance addressing the electrification of new buildings, but it should follow the example of the City of Los Angeles and other jurisdictions which have begun the process to mandate less carbon-intensive building materials in future projects.

7. **The existing building electrification measure needs a definite start date.** Measure E-3, the proposal to mandate replacement of gas appliances in existing buildings with electric heating equipment upon burnout, is the most potent City proposal to achieve its GHG goals. If well implemented, it will account for a large portion of the City's GHG reductions. We recommend an ordinance initial start date at 2025.

8. **Staff need to elaborate on community support for existing building electrification, and use education to ensure compliance and progress.** For low-income housing, as a first step, staff must learn the scope of the problem by creating a comprehensive detailed list of all low-income housing within the City and the age and condition of heating and cooling equipment (including water heating), and ideally also basic information about cooking and other appliances that burn gas. From there the City can build partnerships to

help fund conversions and efficiency measures. For rentals, the city should use its Rental Inspection Program as a tool for education on the requirements for electrification, and benefits and available supports for all electrification measures whether required or not. Finally, improving and streamlining the permit process, requiring preparation for electrification during renovation, and reduced requirements and fees (or no fees) for gas to electric switchouts are all supportive measures the city can and should take.

9. **Improve the CAAP's ability to provide CEQA compliance documentation**. The CAAP, along with the General Plan Update and associated EIR, provide measures and metrics required to fulfill CEQA Guidelines Section 15183.5(b) which streamlines CEQA-mandated GHG analyses for future development by allowing such development to tier from the CAAP's environmental analysis, and to proceed without mitigation beyond that specified in the CAAP. The Plan should add a supplemental Checklist appendix that clearly guides development applicants on how to meet CAAP GHG mitigation measures. One of the best examples of this screening mechanism is Appendix F of the 2045 County of Los Angeles Climate Action Plan.

Public Health

We were surprised to learn that no public health organization was involved or even consulted in the creation of the 2040 CAAP. We recommend immediate engagement with a public health entity or individual that is well-versed in climate change and health equity. Because it is evolving, complex, and highly interrelated, many public health entities are not adept at this work. We recommend forming a relationship with an organization that is leading in climate change research for public health, some suggestions include:

- CDPH Climate Change and Health Equity – CalBRACE Project: https://www.cdph.ca.gov/Programs/OHE/Pages/CalBRACE.aspx
- UC Davis (multiple climate change experts in various areas of focus)
- Public Health Institute Center for Climate Change: https://www.phi.org/our-work/programs/center-for-climate-change-and-health

The CAAP's Adaptation section should include specific, measurable, achievable, relevant, and time-based (SMART) goals for adapting to increases in: Poor mental health, Food system disruption and diminished food safety and nutritional content, Water scarcity and diminished quality, Injuries caused by floods and intense storms, Water-borne illnesses, Vector-borne diseases, Cardiovascular illnesses, Respiratory illnesses, and Heat-related illnesses.

We recommend that the City of Sacramento take a bold stance on adaptation, and implement a plan that simultaneously:

1. Captures and stores GHG emissions (in soils, plants, and buildings)
2. Captures and stores stormwater and recharges the aquifer below the city
3. Reduces surface heat
4. Captures air pollutants (in greenscreens and other plantings)
5. Increases community health, engagement, connections, resilience, and hope
6. Provides locally grown food and business opportunities for residents
7. Provides local distributed solar power and business opportunities for residents
8. Reduces the city's long-term economic burden of health associated with climate change

9. Restructures economic policies in a regenerative fashion, prioritizing health and equity
10. Protects the most vulnerable and is funded by the most wealthy

Our list of recommendations shared with staff provides ample theoretical and applied research to substantiate our recommendations. In addition, we provide real-world examples of communities that are implementing innovative solutions. We are available to consult as a partner to the City of Sacramento as you restructure your Adaptation section.

Other local organizations

We would also like to support the recommendations of the dedicated advocates at SABA, ECOS, Citizens Climate Lobby, Sierra Club Sacramento, Sacramento Climate Coalition, and SacEV. Their members are experts in many of the topics covered in the General Plan and CAAP and we look forward to reviewing and echoing their recommendations as we move forward in the CAAP process.

Sincerely,

Katie McCammon

Katie McCammon
350 Sacramento Coordinator
350sacramento.org

Contributors: Kristi Perry, Rosie Yacoub, Rick Codina, Electrification Team, Oscar Balaguer, Katie Wilkins

350 Sacramento CAAP Comments

Table of Contents

Thanks to the following contributors: Kristi Perry, Rick Codina, Rosie Yacoub, 350 Electrification Team, Oscar Balaguer, Kate Wilkins, Katie McCammon

Introduction

We want to thank City staff for their work on the City's Climate Action and Adaptation Plan. This City Climate Action and Adaptation Plan represents a good effort to reduce carbon emissions over the next decade. We are pleased to see the Existing Building Electrification Ordinance proposed to go into effect in 2025. We applaud the city for their work and recommend that the city strengthen the CAAP with added implementation measures, more detailed metrics, and a separate checklist section that better addresses CEQA mitigation requirements. Additional critiques and detailed suggestions follow.

General Planning and Implementation Recommendations

1. **The city needs an accompanying funding plan**. While the Council has maintained for years that the CAAP adoption will open up conversations about funding, we continue to feel this is being done backward. Without a more detailed funding plan than what is offered in the CAAP appendixes, this plan is purely aspirational words on paper. Bluntly, without money or a more focused long-term plan about how the city will pursue funding options, it doesn't matter what the CAAP says.

2. **More accountability measures are needed**. Actual goal dates and interim milestones for measures are few and far between, so the city leaves much of its work up to interpretation. This does not allow the public to hold the city accountable for failing to meet goals. Additionally, many actions call for passive "support". In 2023, we need to be signaling something stronger than "support" where the city is able to facilitate, implement, or improve. Effective program implementation and reporting require that all measures be specific and enforceable.

3. **More implementation details are needed.** 350 Sacramento recommends that city staff include the development of a rolling two-to-three-year projected project list with funding sources and deadlines and a discussion of how the projects are keeping the city on track to meet the 2030 targets.

4. **Improve departmental alignment**. As recommended by the Mayors' Commission on Climate Change, the city should "[align] each city department's mission, operating procedures, funding priorities and planning documents with the carbon zero vision." We thank staff for working on parts of this recommendation, but a more formal inclusion of this policy would be welcomed in the CAAP.

Recommendations in Order of Appearance in the CAAP

Chapter 1. Introduction

Climate Action Plan and Sustainability in Sacramento

A Qualified GHG Reduction Plan

The CAAP, along with the General Plan Update and associated EIR, provide measures and metrics required to fulfill CEQA Guidelines Section 15183.5(b), which authorizes it to provide full or partial compliance for new development applications in lieu of an EIR. For any new development otherwise requiring an EIR, the Plan must specify requirements *"that apply to the project, and, if those requirements are not otherwise binding and enforceable, incorporate those requirements as mitigation measures applicable to the project"*.

Because the electrification and EV ordinances are already binding, these guidelines apply primarily to land use and mobility measures specified in the CAAP.

The CAAP, along with the General Plan Update and associated EIR, provide measures and metrics required to fulfill CEQA Guidelines Section 15183.5(b) which streamlines CEQA-mandated GHG analyses for future development by allowing such development to tier from the CAP's environmental analysis, and to proceed without mitigation beyond that specified in the CAP. To ensure that the CAAP can meet the CEQA Guidelines and avoid future litigation, the Plan should add a supplemental Checklist appendix that clearly guides development applicants on how to meet CAAP GHG mitigation measures. One of the best examples of this screening mechanism is Appendix F of the 2045 County of Los Angeles Climate Action Plan. The following figure provides an example of the County of Los Angeles checklist.

2045 CAP CONSISTENCY REQUIREMENT	DESCRIPTION OF PROJECT MEASURE(S) / DOCUMENTATION OF COMPLIANCE / EXPLANATION OF NON-COMPLIANCE	PROJECT CONSISTENCY
A) The project would not include the addition of through traffic lanes on existing or new highways, including general-purpose lanes, high-occupancy vehicle (HOV) lanes, peak-period lanes, auxiliary lanes, and lanes through grade-separated interchanges (except managed lanes, transit lanes, and auxiliary lanes of less than 1 mile in length designed to improve roadway safety). B) The project would reduce roadway capacity and VMT. If "Yes," skip checklist items #3, #4, #5, #11, and #12 below. Please complete items #7 through #11 below. If "No," proceed to checklist item #3 below. **Supports 2045 CAP Measures (and Actions):** T1 (T1.1, T1.2)		
4. TIER 1: Increase Density Near High-Quality Transit Areas If the project is located within a High Quality Transit Area (HQTA), it must achieve a minimum of 20 dwelling units (DU) per acre, consistent with the Housing Element Rezoning Program. If the project is not located within an HQTA, it must locate residential and employment centers within 1 mile of an HQTA. **Supports 2045 CAP Measures (and Actions):** T1 (T1.1, T1.2)	*Describe which project consistency options from the leftmost column you are implementing.* *OR,* *Describe why this action is not applicable to your project.* *OR,* *Describe why such actions are infeasible and identify the alternative measure proposed as a replacement strategy (provide additional documentation as described below).*	☐ Project Complies ☐ Not Applicable ☐ Project Does Not Comply and Alternative Measure Proposed
5. TIER 1: Incorporate Bicycle and Pedestrian Infrastructure The project must incorporate pedestrian and bicycle infrastructure into its design: A) Provide pedestrian facilities and connections to public transportation consistent with the Pedestrian Action Plan, Active Transportation Plans, and Vision Zero Action Plan, and any other relevant governing plan. B) Provide bicycle facilities consistent with the Bicycle Master Plan, Active Transportation Plans, and Vision Zero Action Plan, and any other relevant governing plan, and meet or exceed minimum standards for bicycle facilities in the Zoning Code and CALGreen Code. C) Increase sidewalk coverage to improve pedestrian access. D) Improve degraded or substandard sidewalks. E) Incorporate best practices to ensure pedestrian infrastructure is contiguous and links externally with existing and planned pedestrian facilities; best practices include high-visibility crosswalks, pedestrian hybrid beacons, and other pedestrian signals, mid-block crossing walks, pedestrian refuge islands, speed tables, bulb-outs (curb extensions), curb ramps, signage, pavement markings, pedestrian-only connections and districts, landscaping, and other improvements to pedestrian safety.	*Describe which project consistency options from the leftmost column you are implementing.* *OR,* *Describe why this action is not applicable to your project.* *OR,* *Describe why such actions are infeasible and identify the alternative measure proposed as a replacement strategy (provide additional documentation as described below)* *IN ADDITION, provide the length and/or amount of bicycle and pedestrian infrastructure incorporated, such as feet or miles of bikeways.*	☐ Project Complies ☐ Not Applicable ☐ Project Does Not Comply and Alternative Measure Proposed

The Science of Climate Change

How Will Climate Change Affect Sacramento?

General Section Comments - We recommend a dedicated section that solely covers the public health effects of climate change. Multiple climate change-related factors can act in concert to amplify the risks for adverse health outcomes. For example, Sacramento may experience previously rare diseases, such as malaria and dengue due to increased temperature (expanded geographical range and changes in vector behavior), increased drought (leading to the need for increased water storage vessels which can be breeding grounds for mosquitos), and increased intense storms or flood events (leading to standing water which creates a breeding ground for mosquitos). The infographics from the American Public Health Association (see references) are excellent and effectively portray climate change's public health effects.

Health and Social Inequities - Climate change exacerbates existing health and social inequities, with low-income communities and communities of color disproportionately burdened by the health impacts of climate change (American Public Health Association (APHA), n.d.-a). Social and health inequities already burden Sacramento County; for example, Native American and Black residents have the highest rates of premature death (almost double the County rate) and the highest rates of children living in poverty (23% Native American and 26% Black vs. 11% White) (County Health Rankings, n.d.). *The drivers and root causes of climate change and health inequities are often the same, so thoughtful and equitable solutions can address both problems* (APHA, n.d.-a).

Mental Health - The section should include the mental health effects of climate change. Climate change can impair mental health due to slow-moving disasters such as drought, and experiencing climate-related disasters such as wildfire can lead to hypervigilance, avoidance, anger, flashbacks, guilt, anxiety, emotionality, difficulty concentrating, rumination, preoccupation, and social withdrawal (Trombley et al., 2017; Vins et al., 2015). Climate change-related disasters such as floods can disrupt and significantly affect the quality of life, through forced relocation and rebuilding, loss of income and relationships, and disruptions to education (Trombley et al., 2017). Teachers encounter new challenges related to climate change, such as students suffering panic attacks when wildfires rage (Plautz, 2020). Psychologists report increases in anxiety, depression, and despondency, and young patients fear never being able to have a family or a future at all (Plautz, 2020). Some students may experience hopelessness as they learn about climate change and its real-world effects on their lives. ‘Eco-despair’ and ‘environmental grief’ disengage young people from action (Kevorkian, 2004). Climate action may be more likely if the young are hopeful rather than helpless and pessimistic (Ojala, 2012). Hope is teachable, and some effective tools include developing a sense of agency, goal setting, and critical engagement with the issue (Petersen & Barnes, 2020). We recommend that the City of Sacramento be a part of hope-building for all residents, particularly students and young people, and provide opportunities to develop hope skills while taking action. Some ideas include:

1. Partner with high schools that require service hours and provide meaningful climate action work for the city, for example, removing turf and replacing it with regenerative gardens.
2. Partner with community colleges and universities to provide climate action project opportunities to fulfill practicum and thesis requirements.
3. Create a "gap year" program for high school students who defer their first year of college, or who will not attend college, which could involve creating and maintaining regenerative gardens, helping residents market and sell produce, or community organizing to establish a solar cooperative project (Energy.gov, 2021).
4. Create a citywide "climate corps" program for service to the community, available for various circumstances, for example, after completing a 2-year associate's degree or a 4-year bachelor's degree. This program could also fulfill community service requirements for juvenile and adult law offenders or pair with programs such as Alcohol Anonymous to provide meaningful service during recovery. Faith-based, community-based, and non-profit organizations could partner with the city to organize and oversee efforts.

Food System - The section should include food system information and how it will affect Sacramento. Climate change may result in global food systems disruptions, availability limitations, price increases, diminished food safety, and decreased nutritional content in foods (Harvard School of Public Health, n.d.; U.S. Department of Agriculture, n.d.).

Heat-Related Illnesses (p. 14)

In addition to heat stroke and heat exhaustion, rising temperatures lead to dehydration and aggravated cardiovascular and respiratory illnesses (APHA), n.d.-b). In addition, with an increase in median temperature in the region comes the risk of expanded geographic range and changes in vector behaviors, which could lead to increased cases of vector-borne diseases such as Lyme disease, malaria, dengue, Zika virus, and West Nile virus (APHA, n.d.-b). Malaria and dengue are uncommon in California, but this may change as the average temperature warms and precipitation patterns change in the region (Dye-Braumuller & Kanyangarara, 2021; Messina et al., 2019). Extremes in temperature can exacerbate existing respiratory diseases and trigger asthma attacks (Asthma and Allergy Foundation of America, 2019).

Urban Heat Islands (pg. 15)

Sacramento's high density of urban heat islands increases average high air temperatures and contributes to increased mortality rates from respiratory diseases, cardiovascular illnesses, and heat-related illnesses, and climate change is expected to exacerbate this (Aguilera et al., 2021; ArcGIS, n.d.; Huang et al., 2019; National Integrated Heat Health Information System, n.d.; OEHHA, n.d.).

Flooding (p.17)

We recommend a section related to the public health effects of flooding, which include water-borne illnesses such as E. coli from water contamination and injury and death during flood events (APHA, n.d.-b; National Institute of Environmental Health Sciences, n.d.). After flood events, mold proliferation can contribute to various health issues, including respiratory illness (Federal Emergency Management Agency, n.d.). Standing water from a flood can be breeding grounds for mosquitos, leading to increased vector-borne illness (APHA, n.d.-b).

Changes in Winter Snowpack and Drought & Groundwater Supply (p.19 &20)

Water is a basic human need for survival and essential for basic public health needs, including functioning sewage systems and basic sanitation and hygiene (Centers for Disease Control and Prevention, n.d.). Scarce water is more expensive, disproportionately burdening the economically disadvantaged (UNICEF, n.d.).

Drought (pg. 18)

Increased drought can lead to an increased usage of water storage vessels, which can be breeding grounds for mosquitoes if not correctly used. See notes on page 11 regarding vector-borne disease. In addition, dry conditions coupled with heavy winter rainfall can increase Valley Fever cases in California (California Department of Public Health, 2023).

Air Quality (pg. 21)

In addition to wildfire smoke, climate change can increase ozone exposure, particulate air pollution, and respiratory allergens such as ragweed and hay fever (CA.gov, 2022). Exposure to ozone and heat increases the risk of death (Analitis et al. 2014). Climate change increases the severity and duration of allergy season (American Lung Association, n.d.).

Chapter 5. GHG Reduction Strategy

Measure Co-Benefits

Public Health (pg. 76)

All comments from “How Will Climate Change Affect Sacramento?” should be included in the City’s summary in this section.

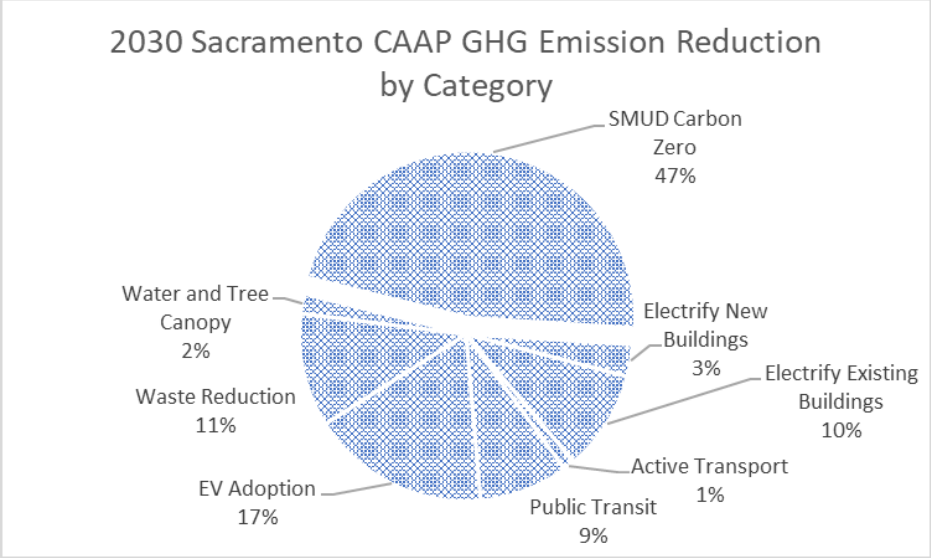
Chapter 6. GHG Reduction Measures and Actions

Built Environment

Measure E-1: Support SMUD as it Implements the 2030 Zero Carbon Plan

The city will have little role in implementing SMUD's conversion to carbon-free power generation and Measure E-1 should be removed from the Plan's recommendations. Instead, the adjusted GHG forecast should fold in projected savings as part of the regulatory context.

Simply put, the Plan relies too heavily on SMUD. Among the Plan's recommendations, the most significant component of near-term savings (47%) will be the difference between the state's renewable power requirements for SMUD (SB 100) and the utility's pledge to achieve zero carbon emissions by 2030. Reductions under SMUD's Zero Carbon Plan should be further substantiated as appropriate under CEQA. "Legislative reductions" - GHG reductions expected from measures adopted by other agencies - typically refer to reductions achieved under adopted federal and State mandates. SMUD is not a federal or State agency; its Zero Carbon Plan, though laudable, has no legislative or regulatory standing. It "is an ambitious plan with the flexibility to work within the guardrails of affordability and reliability" (SMUD, 2023). Its success is not assured, and its aspirational goal is not "fully enforceable through permit conditions, agreements, or other legally binding instruments," as CEQA requires (14 CCR 15126.4(2)). Nor would it be possible to later "incorporate those requirements as mitigation measures applicable to… [a future] project" in order to make it "binding and enforceable" as CEQA regulations stipulate (14 CCR 15183.5(b)(2)).



We also encourage staff to review the recommendations on increasing energy sovereignty on pg. 19 of this document, as it directly relates to the goals of this measure while also creates jobs, strengthens community bonds and resilience, and provides hope and empowerment for climate efforts.

Measure E-2: Eliminate Natural Gas in New Construction

E-2-1: New Building Electrification (pg. 87)

The City's ordinance limiting gas use in new construction is its most successful climate reduction measure to date, fulfilling an early recommendation of the Mayors' Commission on Climate Change four years ago. In the interim, Title 24, the state building standard regulations, in 2022 and in new proposals for 2025 have advanced to all but eliminating future gas furnaces and water heaters in Sacramento's Climate Zone 12.

We **recommend** re-evaluating the projected GHG savings for this measure.

Recommended Additional Action: Add A Measure to Address Embodied Carbon

The materials used in new construction, particularly concrete, emit GHG during their creation, adding as much as 13% of total global emissions by some estimates. In many instances, less carbon-intensive materials can be used as economically feasible alternatives. New proposals for 2025 Title 24 requirements include language covering embodied carbon reduction.

We **recommend** that Sacramento follow the example of the City of Los Angeles and other jurisdictions which have begun the process to mandate less carbon-intensive building materials in future projects (see Appendix B). Specifically, Los Angeles is asking staff to report back on:

1. "… *recommendations for updating the Los Angeles Building Code to create a framework that sets limits on the embodied carbon allowed for new construction and major renovations of buildings larger than 50,000 square feet*" and
2. Requirements for "*less carbon-intensive building materials for building projects in the City that are smaller than 50,000 square feet*."

Measure E-3: Transition Natural Gas in Existing Buildings to Carbon-free Electricity by 2045

E-3-2: Existing Building Electrification Ordinance (pg. 90)

The Existing Building Electrification measure needs a definite start date. With SMUD savings subsumed in the background forecast, Measure E-3.2 (and E-3 generally) becomes the most potent City proposal to achieve its GHG goals. The measure description is short on details, aside from pointing to an upcoming staff strategy report to be followed by a mandatory ordinance with an unspecified start date.

Our **recommendation** is to set the ordinance's initial start date at 2025 for the mandatory replacement of gas space and water heating equipment on burnout, consistent with the forecast in the GHG savings projections. Also, the city should set conditions for exemptions where warranted based on economic and technical feasibility.

Measure E-3.2 also vaguely notes that it will "be implemented through the building permit process." Only a small fraction of gas heating equipment replacements apply for building permits, especially gas hot water heaters which are often replaced without contractor assistance. Measure E-3.2, if successful, will launch a flood of new permit approval applications for which the currently sized and trained Building Permit department will be ill-equipped to enforce and process.

We **recommend** that the city specifies a set of supportive actions to ensure that City permitting staff can process and approve the expected significant increase in permit applications for gas equipment replacement as a result of Measure E-3. Some potential actions could include:

1. Add new permit office staff and provide training on heat pump replacement of gas space and water heating equipment.
2. Waive or reduce the fee for heat pump replacements, and consider if desktop inspections could be used, or if additional wiring inspection is needed.
3. Provide automatic and free permitting for 120-volt plug-in heat pump water heaters, subject to their registering the replacement.
4. Require electrification readiness measures for renovations.
5. Upgrade the permitting database to improve efficiency, create a self-serve online permit counter for some items (including these switchouts), and improve accounting for appliance switchouts. See related item for appliance tracking below.

E-3.3 – E-3.5:

Better Supporting the Transition to Electrification for Low-Income Communities

Measure E-3 will be very challenging to implement in its early years, and the support actions for E-3 call for working with SMUD to expand its low-income programs for electrification, promoting and educating the general public on electrification, and, most significantly, providing incentives and financing for heat pump retrofits.

These supportive proposals could meaningfully assist in the community's transition to electrification. The actions appropriately focus on the low-income community, which faces many financial and practical barriers to electrification, including being made up largely of renters not in control of their equipment changeout. However, the measures fail to identify who within the City will implement the proposals and the source of the underlying funds.

We **recommend** that the City identify proactive steps to assist in electrification efforts focusing on the low-income community, including:

1. Staff must learn the scope of the problem by creating a comprehensive, detailed list of all low-income housing within the City, including properties managed under Section 8, SHRA, CADA, and non-profit agencies such as Mercy Housing, Habitat for Humanity, Mutual

Housing, and others. The list would be used to survey -- to the extent possible -- the age and type of heating equipment and its suitability for near-term replacement.
2. Work with partners on joint funding applications to the Low Income Weatherization Program (LIWP) and other sources for electrification retrofit incentives in identified properties.
3. Identify low-income housing where a pilot project to install inexpensive window heat pumps and plug-in heat pump water heaters would be applicable.
4. Create a warehouse inventory of plug-in HPWH and make them available during emergency failures of gas water heaters at or below cost.
5. Provide education on heat pumps, including incentives, with Rental Inspection notifications.

Recommended Additional Action: Leverage Existing Communication Channels to address additional other gas use

Measure E-3.4 and E-3.5 address space and water heating, the major gas appliances in buildings, but do not address other gas-using equipment, including gas cooking and clothes drying equipment. By the Plan's estimate, these remaining gas users account for more than a quarter of total building gas use.

While gas ranges and dryers are not subject to permitting requirements, we **recommend** that the City leverage its other educational channels, such as the Department of Utilities and the rental inspection program to alert residents to the economic, health, and emission reduction benefits of electric appliance alternatives, including available incentives.

Recommended Additional Action: Build A More Detailed Tracking System For Appliance Changeouts

As shown in the table below, the CAAP lists a set of interrelated target goals for Measure E-3 based on per capita gas use, total gas reduction, and expected GHG reduction. To accurately measure annual impacts, the City will ultimately have to track equipment replacements on a more granular level.

Target GHG Reduction Target and Proposed Tracking Units

City CAAP Measure E-3

		Target Goals		Proposed Tracking Units
Measure	**Metric**	**2030**	**2045**	
E-3 Replace Gas	Therms/person	124	38	Heat Pump Water Heater replacements
Heating Units On	GHG Reduction MT C02e	119,290	402,468	Space Heat pump furnace replacement
Burn-out	Total Gas Use Reduction	-28%	-74%	Gas Dryer and Range electric conversions

Initially, the City will have to establish a credible baseline of existing equipment types and sizes, and a better estimate of expected annual turnover and residual gas equipment. For example, data compiled from SMUD in 2019 for the Mayors Commission Built Environment Task Force (excerpted below) indicated that nearly one-quarter of space heating in its territory was already electric.

Annual HVAC Turnover and Heat Pump Replacement

City of Sacramento

	Initial Pct	Turnover	Total Units	2023	2024	2025
Gas Heat	77.3%	8,377	147,286	7,455	7,238	6,283
Original Electric Heat	22.7%	2,453	44,151	2,453	2,453	2,453
Gas to Heat Pump	0.0%	-	3,479	921	1,139	2,094
Total	100.0%	***10,830***	194,917	***10,830***	***10,830***	***10,830***
New heat pumps as pct of original gas heat				***11.0%***	***13.6%***	***25.0%***

To track future heat pump replacement, the City should enhance its permit database and assign greenhouse gas savings by equipment type and size. HVAC equipment replacement is inadequately identified in the permit database for this reporting requirement. For example, as shown in the permit database summary for 2018, only 2.3% of HVAC equipment changeouts were specifically identified as heat pumps. However, some other units, including the package, split, ground, and roof mount units, may also have been unidentified heat pumps.

HVAC Permits Issued in 2018

City of Sacramento

Type	Project Name	Total	Pct
Residential	Condenser coil only	183	5.5%
	Ducts only	100	3.0%
	Furnace only	142	4.3%
	Ground mount	77	2.3%
	Heat pump	***2***	***0.1%***
	HVAC C/O	555	16.7%
	Mini split	***73***	***2.2%***
	Package unit	22	0.7%
	Roof mount	422	12.7%
	Split system	1,720	51.9%
	Wall furnace	8	0.2%
	Whole House Fan	8	0.2%
	(blank)	2	0.1%
Residential Total		***3,314***	***100.0%***
	Heat pumps:	***75***	***2.3%***

We recommend upgrading the permitting database to separately identify gas units being replaced by heat pump space heating equipment. Otherwise, maintain the current itemized descriptors for unit type and tonnage. For water heaters, continue to identify original gas units and replacement electric heating units, including equipment type (storage, instantaneous) and gallonage.

Modeling Request: Reexamine Savings Forecast for Gas Appliance Replacement

The Plan sets the goals for Measure E-3 GHG emission savings based on percentage reductions of overall gas use in the City. This modeling assumes that a uniformly staggered population of appliances fail at ten years for hot water equipment and 18 years for furnaces. The result is that 100% of all water heaters in the city are replaced by 2035 and 100% of gas furnaces by 2043.

While achieving the forecasted GHG savings from these replacement projections would be gratifying, the model is overly simplistic and should be validated with more robust assumptions, such as the following:

1. The model should also account for a certain level of adoption failure particularly in the early years following a mandatory ordinance due to technical or economic infeasibility, lack of education, or other factors.
2. The lifetime of hot water heating equipment should be set higher, which unfortunately means that the total GHG reduction within the timeframe will be lower unless people swap systems before burnout The CEC assumes 15 years for storage units and longer for instantaneous gas units. See table adjustment below:

Estimated Sacramento City Building Gas Use Reduction With Heating Appliance Changeouts

Equipment Change Out		2026	2027	2028	2029	2030	2035	2040	2045
Hot Water conversion	Reduction	3.4%	6.8%	10.2%	13.6%	17.0%	***34.0%***	34.0%	34.0%
10 Year Average life	Remaining	30.6%	27.2%	23.8%	20.4%	17.0%	0.0%	0.0%	0.0%
Space Heat conversion	Reduction	2.2%	4.4%	6.7%	8.9%	11.1%	22.2%	33.3%	***40.0%***
18 Year Average life	Remaining	37.8%	35.6%	33.3%	31.1%	28.9%	17.8%	6.7%	0.0%
Total annual reduction		***5.6%***	***11.2%***	***16.9%***	***22.5%***	***28.1%***	***56.2%***	***67.3%***	***74.0%***
Adjusted for 15-yr WH life:		***4.5%***	***9.0%***	***13.5%***	***18.0%***	***22.4%***	***44.9%***	***67.3%***	***74.0%***

3. Statistically, the average lifetime is not the point of 100% failure but represents the point when half the appliances have already failed, and half remain – with subsequent failures accelerating quickly after that. A more detailed model would follow replacement availability along these specified appliance survival curves.

Measure E-4: Increase the Amount of Electricity Produced from Local Resources and Work with SMUD to Install Additional Local Storage by 2030

This measure would have City staff work with SMUD to develop at least 1 MW of community solar by 2030 on City property. The Plan does not provide implementation detail nor ascribe any GHG savings to the measure.

Recommendations:

1. This measure augments E-1 by directly assisting SMUD in meeting its goal for carbon-free power by 2030. We recommend that this Plan should credit the Plan with the GHG savings attributable to displacing gas-fired generation from SMUD's fleet of power plants, as well as by reducing purchases from its current contract with Calpine's Sutter Energy Center.
   After 2030, adding solar to the grid will not further reduce GHG assuming SMUD achieves complete carbon neutrality. Until then, local solar generation can help SMUD avoid renewable purchases and construction further afield. It is, therefore, important to act on this solar initiative early to achieve maximum GHG reduction. Local renewable generation will also boost the Plan's Adaptation goals by assisting SMUD with added grid resiliency, particularly during peak stress.

Initially, the GHG savings for a 1 MW City community solar project will be around 435 tons per year; with the addition of battery storage, these savings should remain near constant through 2030.

GHG Emission Reductions for Community Solar

CO2e Estimate (Initial)

PV Size (MW)	Annual (MWh)	GHG Tons/MWh	Total Tons/year
1.0	1,500	0.29	435

Based on utility solar plant loadshape data and Cosumnes Power Plant heat factor.

Either subtract the claimed E-4 savings from the E-1 savings or shift to the adjusted forecast.

2. SMUD currently does not offer a Community Solar option, so the City should negotiate a power purchase agreement with the utility. SMUD offers a standard solar + storage rate which allows self-generation that does not exceed the customer's total power consumption. Depending upon the size of suitable City facilities, this could add to a substantial power amount – Sacramento State, for example, has 3 MW at this rate. Besides being immediately available, this rate option has the advantage of providing higher revenue from offset consumption.
3. The city should facilitate solar and storage projects on private buildings by streamlining the permit process. These two recommendations comply with the 2022 Scoping Plan's recommendations:
    1. "Facilitate deployment of renewable energy production and distribution and energy storage on privately owned land uses (e.g., permit streamlining, information sharing)", and
    2. "Deploy renewable energy production and energy storage directly in new public projects and on existing public facilities (e.g., solar photovoltaic systems on rooftops of municipal buildings and on canopies in public parking lots, battery storage systems in municipal buildings[1])"

Transportation

Measure TR-1 & TR-2: Improve Active Transportation Infrastructure to Achieve 6% Active Transportation Mode Share by 2030 and 12% by 2045 and Support Public Transit Improvements to Achieve 11% Public Transit Mode Share by 2030 and Maintain Through 2045

The CAAP should stand by its active and public transportation measures. These measures set goals to reduce vehicle use by increasing biking and walking to 6% of total travel in 2030 and

[1] California Air Resources Board 2022 Scoping Plan, Appendix D, page 12.

12% by 2045, and also to increase use of public transit to 11%. The Plan questions the attainment of these goals, noting the lack of current funding sources and the poor historical record of reducing Vehicle Miles Travelled (VMT) in the state. Accordingly, it essentially line-itemed out the estimated GHG savings from TR-1 and TR-2 from Table 1.

Undoubtedly, removing the emission reporting for these goals is necessary to comply with CEQA, which requires that CAAP measures can be shown to be feasible. Nevertheless, we **recommend** that these recommendations should be retained for compliance metrics in new development applications.

Carbon Sequestration

Measure CS-1: Increase Urban Tree Canopy Cover to 25% by 2030 and 35% by 2045

The city states that "carbon sequestration is the process by which carbon is taken out of the atmosphere and sequestered in soil, vegetation, or man-made structures", yet the only measure that is evident in this plan is to increase the tree canopy. Is there any plan to include other vegetation, soil, and man-made structure carbon sequestration measures? These may have substantial mitigation and adaptation co-benefits. Improved soil, green roofs, and green walls could increase urban food growth potential, thereby increasing community resilience to disrupted food systems. Improved soil use and permeable pavement could increase the ability of soil to absorb water during flood events and recharge groundwater, thereby increasing community resilience to floods and water scarcity (Smedley, 2023). In addition, increased greenspace is linked to reduced respiratory illness, mortality, heart rate, and community violence; and increased attention, mood, and physical activity (Sadler et al., 2017).

Chapter 7. Adaptation

Climate Change Vulnerability

Adaptation Strategy

As the capital of California, Sacramento can lead the world in a transformative and just response to the climate crisis. Our actions will determine what kind of future our children and grandchildren will face. Without transformative societal change, we should expect to see escalating costs associated with adverse health outcomes associated with climate change. For example, just six climate-related events in the United States between 2000 and 2009 resulted in over $14 billion in health costs, with 95 percent due to the value of lives lost prematurely (Knowlton et al., 2011). Climate change should aggravate conditions such as respiratory illnesses, cardiovascular illnesses, and vector-borne diseases, so we should expect to see the costs associated with those illnesses spiral with accelerating climate change. In Sacramento County, in 2010, the economic burden of cardiovascular disease and asthma alone totaled over three *billion* dollars (Brown et al., 2015). In 2005, just one outbreak of West Nile in Sacramento County resulted in a health burden of $2.28 million for medical treatment and patients' productivity loss (Barber, Schleier & Peterson, 2010). With roughly a third of the county population living within the city limits, we can extrapolate from these numbers that the city bore one-third of these costs.

We believe we can transform communities while mitigating and adapting to climate change and becoming healthy and more equitable, requiring out-of-the-box solutions and transformative leadership. One example of a program that has successfully transformed communities and could be adapted to address climate change is the Blue Zones Project (Blue Zones Project, n.d.). Sacramento County is engaged with the Blue Zones team on an Alzheimer's initiative (Sacramento County, 2023). Blue Zones Communities experience "greater well-being, improved health outcomes, reduced costs, and increased civic pride, all of which support healthy economic development" (Blue Zones Project, n.d.).

Elements of a transformed community may include:

1. **Regenerative economy:** A regenerative economy that prioritizes zero emissions, health, and equity (World Economic Forum, 2022). Make the zero-carbon, healthy, equitable choices the default, the least expensive, and the easiest. If the net zero, healthy, low-consumption option is *inexpensive and convenient,* the public will naturally adopt it. The economic system should protect the most vulnerable and disadvantaged from being disproportionately affected by economic policy change.
    A. **Hyper-local focus** with local sovereignty of essential services (Food, water, energy) and job creation.
        i. **Water sovereignty** could include adopting a "sponge city" urban planning model that aims to absorb, clean, and use rainfall in an ecologically friendly

way. The concept relies on trees, lakes, parks, permeable roads, rooftop gardens, rainwater harvesting, and rain gardens to help reduce flooding, pollution, and water scarcity in urban areas (Smedley, 2023; Zhang, 2017). This "sponge" then filters the water to the aquifer to recharge groundwater (Smedley, 2023). In regenerative farms, where the soil is healthy and untilled, up to 90% of the water captured by the soil can pass through to the aquifer (Smedley, 2023).

ii. **Food sovereignty** could include an urban network of rooftop, vertical, sidewalk, and community gardens. In 2021, the Biden administration selected Sacramento to receive funding via the Local Foods, Local Places initiative to create community hubs for local food sovereignty (City of Sacramento, 2021). We recommend that the city expand upon this initiative, creating personal income for residents while improving the soil using regenerative methods.

iii. **Energy sovereignty** could include increased incentives for residential rooftop solar, effectively making it less expensive to buy solar than to continue to buy energy. SMUD energy is inexpensive compared to PG&E, so the solar incentives fall short in promoting roof-top solar. Energy sovereignty could also include creative solutions encouraging solar adoption while creating jobs and personal income for residents, such as solar cooperatives.

B. **Transportation** is 57% of the 2016 GHG Emissions inventory. How can the city de-prioritize cars and re-prioritize walking and biking, while encouraging that all transit (including cars) are zero emissions? Make it easier and less expensive to simply not own a car. How do we reimagine the city to work, play, worship, etc right where they live, or within walking or biking distance? Can the city provide jobs, schools, child care, and shopping within residents' walking/biking radius? When people leave or visit the city, can the transportation system allow for inexpensive and convenient electricity-powered transport? For example, if residents need to travel to the Bay Area, the prohibitively expensive ~$30 one-way ticket may push them to drive instead.

Goals, Policies and Actions

GOAL A-2: Create built environments that reduce exposure to extreme heat and mitigate urban heat island effect.

ERC-3-5: Tree List (pg. 148)

When selecting trees, evaluate pollen production of the selected varieties and pollution sequestration ability. Pollen-producing varieties could exacerbate asthma and other respiratory illnesses.

A-2-3: Cooling Landscape Standards (pg. 150)

Utilize green roofs to reduce urban heat while capturing pollutants and stormwater. In Hong Kong, a green roof installation on the top of a railway station had cooling effects, most significantly in summer and on sunny days (Peng & Jim, 2015).

GOAL A-3: Reduce the risk of damage to life, infrastructure, and property due to flooding.

A-3-2: Evaluation and Mitigation of Critical Facilities in Identified Hazard Areas (pg. 158)

Consider the "sponge city" design referenced in the Adaptation/water sovereignty comment above.

A-3-6: Flood Recovery Plan & A 3.7: Public Information Flood Response Plan (pg. 159)

This action should include waterborne illness response, including communications with the public before floods on how to prevent waterborne illness. Establish proactive coordination with local medical service providers to create a flood injury and water-borne illness response protocol.

GOAL A-4: Increase awareness of and expand community resources to address the adverse health effects of air pollution.

ERC-4-3: Project Design (pg. 166)

This design should include nature-based solutions to capture pollutants from the air (while also providing heat-reduction and carbon-capture benefits). Examples of communities that have already done this include:

1) Multiple cities, including multiple United States cities, Shanghai and Hermosillo, Sonora, Mexico, have found a strong correlation between increased urban trees and greenery and improved air quality and respiratory health (Nowak et al., 2006; Ortega-Rosas et al., 2020; Wu et al., 2021).
2) In Birmingham, UK, an urban area a green screen roadside installation demonstrated the ability of plants to capture air pollutants after two months of planting, with broad-leaf evergreens most effectively sequestering pollutants (Dover & Phillips, 2015)

ERC-4-2: Air Quality Awareness (pg. 166)

Expand on and learn from existing Initiatives that educate the public about air quality (including exposures to vehicle emissions) and personal protection including:

1) San Joaquin Valley's, SJVAir Network's network of air quality monitors provides real-time air quality alerts to disadvantaged communities based on the monitor nearest their home, work, and school via a user-friendly app (Central California Asthma Collaborative, n.d.).
2) In San Joaquin Valley, the Asthma-Friendly Outdoor (Ambient) Air Quality Flag Program, a school-based program, educates about air quality and the health effects of air

pollutant exposures and has reduced exposure to outdoor environmental triggers in urban, rural, and agricultural communities in San Joaquin Valley (Shendell et al., 2007).

3) Throughout California, California Breathing's Achievements in Respiratory Health Awards program trains school nurses in asthma prevention and encourages schools to improve air quality, such as stopping buses idling near schools (CDC, n.d.-a).

A-4-1: Air Filtration Systems (pg. 167)

Examples of existing initiatives to provide air filtration to the public include:

1. In Sacramento, 350 Sacramento has distributed over 500 air filters to local low-income families speaking over a dozen different first languages. Funding for this project comes from the Sacramento Air Quality Management District (350 Sacramento, n.d.).
2. In San Joaquin Valley, the Climate Adaptation Program provides education and protective equipment such as air filters and masks to help families protect themselves from hazardous exposures to outdoor air pollution, and multiple asthma education programs aimed at families have reduced asthma and improved quality of life by reducing pollution exposures, empowering parents, and facilitating collaboration between parents and healthcare providers (Central California Asthma Collaborative, n.d.; TeeSy, 2018).
3. Some San Joaquin Valley communities, including Stockton, implemented CalAIM's program for Medi-Cal beneficiaries, providing air quality assistance such as air filters (California Health & Wellness, 2022).
4. In the Lower Yakima Valley, community health workers delivered portable HEPA air filters to study participants and observed significant improvement in asthma outcomes (Drieling et al., 2022).

Other initiatives in California to improve air quality are:

1. The Port of Oakland lobbied officials with the help of California Breathing to reduce emissions associated with diesel emissions, resulting in an estimated fifty percent reduction of diesel emissions and pollution in the area (CDC, n.d.-b).
2. The Clean Transportation Outreach Program's Clean Vehicle Empowerment Collaborative helps bring electric vehicles and electric vehicle charging infrastructure to equity communities in every county of San Joaquin Valley (Central California Asthma Collaborative, n.d.).
3. Four communities in San Joaquin Valley, Arvin/Lamont, Stockton, Shafter, and South Central Fresno, received AB 617 funding for projects to reduce emissions, air pollution, and urban heat (San Joaquin Valley Air Pollution Control District, n.d.-b; San Joaquin Valley Air Pollution Control District, 2019).
4. The San Joaquin Valley Air Pollution Control District's "Tune In and Tune Up" program provides residents with free emission tests and vouchers for emission-related repairs,

benefitting 60,000 disadvantaged residents since 2005 and substantially reducing vehicle emissions (Fernandez-Bou, 2021).

5. The EV Equity Program educates individuals about the environmental benefits of driving an Electric Vehicle (EV) and provides clean vehicle grants and rebate application assistance (Central California Asthma Collaborative, n.d.).

GOAL A-5: Increase community resilience to prepare for climate impacts.

ERC-8-8: Heat Waves (pg. 168)

The City of Sacramento should consider "When is too hot to work/play outdoors?", and create an emergency planning protocol whereby prohibiting employees from working outside, shutting down schools, and urging all residents to stay indoors or seek cooling centers if unhoused or without air conditioning (similar to "snow days" and "deep freeze" warnings in cold environments). Low-income families should have financial protection, as they may lack the economic resources to miss work or keep their children home from work. Thus, they may feel they have no choice but to endure dangerous temperatures. Making sure pools stay open during these days is an important service the City can provide to its residents. Also, consider ways to improve swimming opportunities along our river access.

PFS-2-8: Emergency Preparedness Programs (pg. 170)

Extreme heat waves should be considered a disaster and included in disaster planning.

GOAL A-6: Enhance water supply diversification and prioritize water use efficiency to build resilience to the effects of climate change.

ERC-5-2: Reducing Storm Runoff (pg. 179)

We recommend stronger language such as "prohibit project designs that do not minimize drainage concentrations, minimize impervious coverage, utilize pervious paving materials, utilize low impact development (LID) strategies, and utilize Best Management Practices (BMPs) to reduce stormwater runoff." There were not any actions in the plan that support ERC 5.2.

A-6-3: (pg. 180): Water Conservation Resources and Incentives

To address the coming water scarcity crisis, we need swift action to mandate water reduction measures, suggestions include:

1. Prohibit the installation of residential turf and mandate existing residential turf removal by a specific date. The City of Sacramento should pay for the removal and replacement with plant selections that not only shade the soil but are low maintenance, heat tolerant, and improve soil quality to allow for increased stormwater retention and pass through to the aquifer. Better yet, replace residential and municipal turn with regenerative gardens that produce

food, improve soil health, and retain stormwater, resulting in income generation opportunities for residents and groundwater recharge for the city.

2. Mandate that all households reduce their consumption by a certain date to a sustainable level in a water-scarce future. The city should pay for retrofits to make this happen, as the costs the city incurs in doing these measures now will help avert a costly water crisis later.
3. Consider a tiered pricing structure, where water is priced inexpensively up to a certain threshold, then increasingly expensive after that point. So, for example, if a resident wants a backyard pond with a high evaporation rate that requires constant refilling, they can do that, but must pay. Financial policies should protect the least advantaged and be funded by overuse by the most advantaged. Refer to the book The Last Drop by Tim Smedley (cited below), which includes many real-world water sustainability success stories.

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Appendix A: Recommended GHG Reduction Strategies

From California Air Resources Board 2022 Scoping Plan: Appendix D – Local Actions

Table 1: Priority GHG Reduction Strategies

Priority Areas	Priority GHG Reduction Strategies
Transportation Electrification	Convert local government fleets to ZEVs and provide EV charging at public sites
	Create a jurisdiction-specific ZEV ecosystem to support deployment of ZEVs statewide (such as building standards that exceed state building codes, permit streamlining, infrastructure siting, consumer education, preferential parking policies, and ZEV readiness plans)
VMT Reduction	Reduce or eliminate minimum parking standards
	Implement Complete Streets policies and investments, consistent with general plan circulation element requirements
	Increase access to public transit by increasing density of development near transit, improving transit service by increasing service frequency, creating bus priority lanes, reducing or eliminating fares, microtransit, etc.
	Increase public access to clean mobility options by planning for and investing in electric shuttles, bike share, car share, and walking
	Implement parking pricing or transportation demand management pricing strategies
	Amend zoning or development codes to enable mixed-use, walkable, transit-oriented, and compact infill development (such as increasing the allowable density of a neighborhood)26
	Preserve natural and working lands by implementing land use policies that guide development toward infill areas and do not convert “greenfield” land to urban uses (e.g., green belts, strategic conservation easements)
Building Decarbonization	Adopt all-electric new construction reach codes for residential and commercial uses
	Adopt policies and incentive programs to implement energy efficiency retrofits for existing buildings, such as weatherization, lighting upgrades, and replacing energy-intensive appliances and equipment with more efficient systems (such as Energy Star-rated equipment and equipment controllers)
	Adopt policies and incentive programs to electrify all appliances and equipment in existing buildings such as appliance rebates, existing building reach codes, or time of sale electrification ordinances
	Facilitate deployment of renewable energy production and distribution and energy storage on privately owned land uses (e.g., permit streamlining, information sharing)

	Deploy renewable energy production and energy storage directly in new public projects and on existing public facilities (e.g., solar photovoltaic systems on rooftops of municipal buildings and on canopies in public parking lots, battery storage systems in municipal buildings)

Table 3: Key Residential and Mixed-Use Project Attributes that Reduce GHGs

Priority Areas	Key Project Attribute
Transportation Electrification	Provides EV charging infrastructure that, at minimum, meets the most ambitious voluntary standard in the California Green Building Standards Code at the time of project approval
VMT Reduction	Is located on infill sites that are surrounded by existing urban uses and reuses or redevelops previously undeveloped or underutilized land that is presently served by existing utilities and essential public services (e.g., transit, streets, water, sewer)
	Does not result in the loss or conversion of natural and working lands
	Consists of transit-supportive densities (minimum of 20 residential dwelling units per acre), or Is in proximity to existing transit stops (within a half mile), or Satisfies more detailed and stringent criteria specified in the region's SCS
	Reduces parking requirements by: Eliminating parking requirements or including maximum allowable parking ratios (i.e., the ratio of parking spaces to residential units or square feet); or Providing residential parking supply at a ratio of less than one parking space per dwelling unit; or, For multifamily residential development, requiring parking costs to be unbundled from costs to rent or own a residential unit.
	At least 20 percent of units included are affordable to lower-income residents
	Results in no net loss of existing affordable units
Building Decarbonization	Uses all-electric appliances without any natural gas connections and does not use propane or other fossil fuels for space heating, water heating, or indoor cooking.

Appendix B: Embodied Carbon Recommended Addition to Los Angeles County Sustainability Plan

"Buildings contribute roughly forty percent of global carbon emissions. While the majority of efforts to regulate carbon emissions from the building industry to date have focused on decarbonizing building operations, comparatively limited focus has been placed on embodied carbon. Embodied carbon is defined as the emissions associated with building construction—the material extraction, transportation, manufacturing, and construction processes which account for up to 13% of all CO_2 emissions worldwide.

If the City hopes to meet our GHG emission reduction targets, it is imperative to address carbon emissions from building materials. The City is in a strong position to mandate reductions of greenhouse gas emissions from building construction; the City's building code places restrictions on materials and products that can be used in construction.

In order to reduce embodied carbon, it needs to be accurately measured. The building industry has identified Whole Building Life Cycle Assessments (WBLCA) as a standardized framework to assess the embodied carbon within a proposed building. This methodology assesses the whole-life carbon emissions of the entire building, including raw material extraction, processing, manufacturing, distribution, use, and end of life management of materials and building products. This methodology can be used to identify and select building materials and products with lower lifecycle carbon emissions and consider trade-offs in the context of a whole building design. For buildings larger than 50,000 square feet, the additional cost of completing a WBLCA has been estimated by the Rocky Mountain Institute to be less than 0.1% of total building cost. The City has already made commitments to reduce building-associated emissions through the C40 program and the Sustainable City pLAn. The Sustainable City pLAn calls for all buildings to be net zero by 2050, while the C40 Clean Construction Declaration commits the City to reducing embodied carbon for major construction by 50% before 2030. Without implementing a tangible policy to support its commitments, the City will not meet these targets.

I THEREFORE MOVE that the City Council instruct the Department of Building and Safety, in consultation with the City Attorney, to report back within 120 days with recommendations for updating the Los Angeles Building Code to create a framework that sets limits on the embodied carbon allowed for new construction and major renovations of buildings larger than 50,000 square feet, in consultation with stakeholders and industry experts to be implemented with an effective date of January 1, 2024. The report should consider:

- Mandating completion of a Whole Building Life Cycle Analysis, showing a reduction in Global Warming Potential (GWP) over a baseline, in order to obtain permits to commence construction for new building projects and major renovations over 50,000 square feet and developing a timeline for required GWP reductions in accordance with the City's C40 commitments.
- Defining requirements for WBLCA models including mandatory and optional building elements and materials to be included.
- Defining requirements for baseline models to be used in a WBLCA against which GWP reductions are to be measured.

- Collecting and analyzing WBLCA data for the purpose of developing and publishing benchmarks by building typology against which GWP reductions will be measured in the future.
- Developing a process for verification of installed materials against materials included in the WBLCA and/or including a post-construction update to the WBLCA.
- Developing financial assistance to complete a WBLCA for affordable housing developments, in consultation with SCANPH.
- Developing a timeline and plan for the implementation of these requirements; and
- Staffing and resources needed to implement this proposal, including identifying and select a contractor with the necessary expertise in evaluating WBLCAs and preparing code amendments.

I FURTHER MOVE that the City Council instruct the Department of Building and Safety, in consultation with the City Attorney, to report back within 120 days with recommendations for an update to the Los Angeles Building Code to require less carbon-intensive building materials for building projects in the City that are smaller than 50,000 square feet. The report should include:

- A recommendation on adopting the Buy Clean California Act (BCCA) material GWP limits as part of the City's building code with an amendment to include processed glass and insulated glazing units.
- A recommendation on including GWP and/or cement limits for concrete.
- An assessment of ways to implement these policies without substantially increasing housing costs, in consultation with SCANPH; and
- The possibility of including financial assistance to comply with these policies for affordable housing developments.

I FURTHER MOVE that the Council instruct the Department of Building and Safety to report back within 120 days with recommendations to incentivize the reduction of construction waste through re-use of building materials. The report should consider:

- Including exemptions to WBLCA and Buy Clean requirements in cases where more than 45% of an existing building is reused; and
- Advancing existing requirements or creating new requirements for construction and demolition waste diversion away from landfills and incentivizing re-use of building materials."

Amy Yang

From: Matt Anderson <matthew.n.anderson@gmail.com>
Sent: Thursday, June 22, 2023 2:53 PM
To: Matt Anderson
Cc: Sac 2040 Gpu
Subject: CAAP Comments

Hello Commissioners,

I hope you are well. I am writing in reference to Item 6 tonight, the public review of the draft CAAP. Unfortunately I cannot attend the meeting and wanted to pass along a few comments and specific action suggestions, applicable to both GP and CAAP. Apologies in advance for the wall of text.

Overall - This is a fantastic document that really will be held up as an example of a comprehensive CAAP to cities around the state, staff and the city as a whole should be proud of this document. **This body** (and staff!) is most likely to determine whether or not this CAAP is successful - the vast majority of emissions (and adaptation actions) pertain to the built environment (especially transportation), directly in the purview of this body. A few comments:

Multimodality - both the GP and CAAP talk about prioritizing pedestrian and active transportation but focus on electrifying cars to reduce emissions. This makes sense from a legal perspective (emissions must be quantified) but from a practical and equity point of view, much more emphasis on active transportation and transit should be considered.

1) Consider reviewing and increasing the active transportation targets. 6% won't get us to carbon-neutral, will continue to disproportionately impact disadvantaged communities (noise, particulate matter from increased EVs) and frankly probably won't even be enough infrastructure to stop the ever-increasing number of bicycle/pedestrian deaths. If 6% is still deemed appropriate, please consider saying explicitly "triple active transportation mode share" as seems to be suggested by the calculations.

2) Consider alternate or additional tracking opportunities for the (currently) 6% KPI (traffic cameras that are used to track cars approaching intersections can also be used to track/estimate bicycle counts. The City of Sacramento already has these cameras at some intersections and would likely only need a software upgrade.)

Infill - Again, transportation is the single largest category of emissions. Whether or not Sacramento achieves these targets is going to depend on development patterns & related VMT. Combined with the housing crisis we are currently undergoing, I believe the following are the bare minimum of what we should do to allow more housing in Sacramento. The commissioner was spot-on last meeting when he noted that these plans need to address homelessness (outside of just the housing

element!) – our lack of housing success or failure is inextricably linked to our planning and zoning regulations.

3) Increase maximum FAR of all residential development within ½ mile of *all* high frequency transit stops to at least 4.0. (GP Map LUP-6, more generalized language on increasing FAR in E-5)

4) Increase maximum FAR for all areas zoned "neighborhood" to 2.0 (GP Map LUP-6)

5) Add bullet point to E-5.1 or E-5.4 to have staff review additional planning regulations that can be detrimental to new housing (minimum lot sizes, setbacks, etc.) and have staff propose changes. [This is partially covered in missing middle study but would be useful to have explicitly.]

Adaptation/Trees - One of the distinguishing features of Sacramento and integral to this plan. Also typically one of the top community feedback comments, but when the City of Sacramento designs plans for the public right-of-way (e.g., recent transportation plan you reviewed) they are often secondary consideration, if considered at all.

6) Add item CS-1.5: Prioritize urban canopy in city projects and require all city planning documents for the public right of way to identify location of trees. [or similar verbiage as staff sees fit]

Thank you for your consideration.

Best,
Matt

August 21, 2023

Remi Mendoza, CFM, Senior Planner/Project Manager
Vic Randall, Senior Planner/Project Manager
Community Development Department
City of Sacramento
915 I Street
Sacramento, CA 95814

Re: Draft 2040 General Plan and Climate Action & Adaptation Plan

Dear Mr. Mendoza and Mr. Randall:

Thank you for the opportunity to submit comments in response to the City of Sacramento's drafts of its 2040 General Plan (GP) and Climate Action & Adaptation Plan (CAAP), hereby collectively referred to as the Drafts. We submit these comments on behalf of the Citizens' Climate Lobby, Sacramento Chapter.

We applaud Mayor Steinberg for having convened the Mayors' Commission on Climate Change (MCCC) which provided solid recommendations to the City several years ago. We also commend the City for establishing a variety of changes to the planning guidelines and climate goals. However, we are extremely concerned that, despite having set these goals, the Drafts do very little to establish specific, measurable goals, and dedicated, recurring funds required for implementation. Without bold actions, backed by funding and measurable goals, the Drafts will not significantly change Sacramento, and thus will not achieve the results we need for a livable and equitable future. We ask that serious consideration is given to our comments and that the Drafts be revised to address our concerns.

Determining Metrics and Establishing Goals

In reviewing the Drafts, we felt it important to examine the goals and guidelines the City Council has established to determine whether the Drafts will result in achieving these specific goals. Here are the goals to which the City has committed:

- On December 10, 2019, the City Council declared a climate emergency, and charged the City Manager to use "maximum feasible efforts to implement emergency-speed carbon reduction actions towards eliminating emissions by 2030 as much as possible" (Res. No. 2019-0465).
- On January 14, 2020, the City Council declared a shelter crisis in the City of Sacrament (Res. No. 2020-0017), and approved the continuation of this declaration on September 13, 2022 (Res. No. 2022-0296)

To achieve this goal, the City must set and meet ambitious targets. In reviewing the Drafts, for our analysis, we rely in part on certain regulatory requirements and state guidance provided by the Governor's Office. For the CAAP 14 CCR § 15183.5 sets forth the requirements for a Climate Action Plan. It states:

> (b) Plans for the Reduction of Greenhouse Gas Emissions. Public agencies may choose to analyze and mitigate significant greenhouse gas emissions in a plan for the reduction of greenhouse gas emissions or similar document. A plan to reduce greenhouse gas emissions may be used in a cumulative impacts analysis as set forth below. Pursuant to sections 15064(h)(3) and 15130(d), a lead agency may determine that a project's incremental contribution to a cumulative effect is not cumulatively considerable if the project complies with the requirements in a previously adopted plan or mitigation program under specified circumstances.

(1) Plan Elements. A plan for the reduction of greenhouse gas emissions should:

(A) Quantify greenhouse gas emissions, both existing and projected over a specified time period, resulting from activities within a defined geographic area;
(B) Establish a level, based on substantial evidence, below which the contribution to greenhouse gas emissions from activities covered by the plan would not be cumulatively considerable;
(C) Identify and analyze the greenhouse gas emissions resulting from specific actions or categories of actions anticipated within the geographic area;
(D) Specify measures or a group of measures, including performance standards, that substantial evidence demonstrates, if implemented on a project-by-project basis, would collectively achieve the specified emissions level;
(E) Establish a mechanism to monitor the plan's progress toward achieving the level and to require amendment if the plan is not achieving specified levels;
(F) Be adopted in a public process following environmental review.

In the State of CA General Plan Guidance 2017, the California Environmental Quality Act (CEQA) also provides local governments with a standard for the methodology and measures used in Climate Action and General Plans: "…Methodology and calculations should be transparent and replicable with the goal of providing substantial evidence supporting the assumptions, analysis, and conclusions. Measures should also be real and verifiable, through either full enforceability or through substantial evidence in the record supporting an agency's conclusion that mitigation will be effective." The guidelines further include a quote from a recent court decision, that "…a plan should include measures that are known to be feasible, coupled with specific and mandatory performance standards to ensure the measures as implemented, will be effective. "(p.229-230)

While offering significant flexibility in plan design, CEQA directs local governments to exercise authority through regulation of transportation, municipal operations, land use and building. "Cities and counties have the authority to reduce (GHG) emissions, particularly those associated with land use and development……" (p.222) and "…Local governments regulate many activities that contribute to GHG emissions and air pollutants, including industrial permitting, land use and transportation planning, zoning and urban growth decisions, implementation of building codes and other standards, and control of municipal operations." (p.223).

California has also set guidelines for housing throughout the state through SB 6 and AB 2011, both of which encourage mixed use zoning to improve the availability of low- and middle-income housing in the state.

We also rely on the goals set by the City in the respective documents, such as in the CAAP adaptation goals on slide 48 of the workshop:

A-1: Strengthen City government capacity for integrated, holistic climate adaptive strategies and to reduce climate risks.
A-2: Create built environments that reduce exposure to extreme heat and mitigate urban heat island effect.
A-3: Reduce the risk of damage to life, infrastructure, and property due to flooding.
A-4: Increase awareness of and expand community resources to address the adverse health effects of air pollution.
A-5: Increase community resilience to prepare for climate impacts.
A-6: Enhance water supply diversification and prioritize water use efficiency to build resilience to the effects of climate change.

And in the GP, the Guiding Principles:

(2) Link new growth with access to high-frequency transit in order to optimize public investments and support an accessible, convenient network that offers a viable alternative to the automobile and promotes public health.
(4) Cultivate a broad mix of housing types in all residential zones throughout the city to provide options for residents of all income levels, while protecting existing residents and communities from displacement.

(5) Foster "complete neighborhoods" that provide for residents' daily needs within easy walking or biking distance from home and that promote regular physical activity.
(7) Take bold action to achieve carbon neutrality by 2045 and become a leading voice in the effort to reduce greenhouse gas emissions and adapt to climate change,"
(11) Integrate and invest in an extensive tree canopy, green infrastructure, parks, and gardens in all neighborhoods, particularly disadvantaged communities, to protect against excessive heat, to improve air and water quality, and to sustain human and environmental health. Recognize the importance of growing and maintaining a vibrant, expanding tree canopy for climate change mitigation and adaptation.
(14) Develop infrastructure to support zero emission transportation and provide viable options for low-income households.
(15) Prioritize safety in Sacramento's neighborhoods, public parks, streets, and on public transit.
(40) Reduce reliance on single-occupant vehicles, prioritize and promote active transportation and, high-occupancy transport.
(41) Improve the efficiency of the multi-modal transportation system and plan infrastructure that can flexibly accommodate rapidly emerging modes of transportation.
(42) Recognize that traffic deaths and serious injuries are a public health issue and, with a goal of reaching zero traffic deaths by 2027 through the Vision Zero initiative, the City will make safety of human life the City's highest priority, taking proactive, preventative steps.
(43) Include equity as a prioritization tool to ensure investment in underserved neighborhoods to improve equity in transportation, mobility, and other public service investments. Include all affected communities, including youth, in transportation planning decisions.

Because the goals in the Drafts are generally closely aligned and there are overlapping goals and actions, this comment has been broken up to address similar topics between the Drafts together, covering the Goals and Planning (G&P) and Implementing Action (IA).

Funding

We have overarching concerns about the proposed Measures and Goals found in both documents. Many of the G&P and IA in the Drafts pertaining to the GHG reductions, don't meet CEQA's guidelines for Measures, as they are not real, feasible, enforceable, or supported by evidence. Moreover, planned actions often are insufficient to achieve the stated goals. The Drafts are not internally consistent. Half of the Priority Funding Measures do not meet the criteria as described in the CAAP and goals in the GP are not reflected consistently across the entire document. For example, establishing an urban tree canopy is a stated goal in Chapter 6 of the GP, Environmental Resources and Constraints, but it is not mentioned in Chapter 3, Land Use and Placemaking even though beautification is part of the G&P and IA for the chapter.

The Draft goals are largely unfunded and unstaffed, especially the CAAP. An unfunded plan is not real or feasible as required by CEQA. CAAP implementation is estimated at $3.2 billion. It will require both "substantial commitment of staff time", and the addition of 6 full-time staff people (69). The CAAP characterizes the City of Sacramento as "understaffed", and notes that current staff is unable to implement all the actions assigned to "staff-in-kind". (Appendix D, 24, Funding Chart 5-11). Despite this staffing deficit, current budget projections include only 1-2 additional staff for the Office of Climate Action and Sustainability.

The CAAP suggests the Civic Sparks Fellow program as a potential source of staffing (Appendix D, 2). But Civic Sparks Fellows are not comparable to permanent staff appointments. Fellows are "emerging professionals" and require more oversight and training than typical staff. Civic Sparks Fellows won't provide continuity or build the institutional knowledge of regular staff. The fellowships last only 11 months. Further, the City can't maximize funding opportunities if they lack the requisite staff to pursue them. Raising funds will require monitoring state and federal funding, drafting and revising applications, lobbying for changes to statutes, and more. Many of these tasks require expertise. All of them are labor intensive. **If the City is unwilling to provide the staff**

necessary to develop and implement the goals in the Drafts, they are signaling an unwillingness to seriously address climate change and improve equity city wide.

The CAAP measures also fall short of CEQA's mandate, as the City appears unwilling to exercise its authority to create substantive change. We are troubled by the City's lack of leadership and political will to provide measurable and funded goals. We see the City embrace politically expedient goals and measures rather than exercise regulatory control as CEQA intended. Most of the goals and measures are acceptable so far as they go but fail to create the degree of change necessary to be successful. This is especially apparent in the City's reluctance to champion changes in land use sufficient to impact our disastrous transportation patterns.

Per the CAAP, priority Funding will be given to measures that provide the most significant reductions in GHG emissions, and will be given to Measures that can be leveraged with funding from other sources. Based on this logic, the TR-1 AT and CS-1 Urban Tree Canopy Measures do not meet these criteria. However, the co-benefits, health, comfort, equity etc., resulting from an urban forest for Active Transportation (AT) can't be overstated. These benefits are significant enough to override other considerations. It should be specified in the document, making the priority process transparent and subject to review. It is very concerning to see the City promoting other expensive and ineffective measures given the grave lack of funding and abundance of alternative measures.

Sustainable Planning and Development

The actions laid out in LUP-A.8 are admirable and point the City toward a more equitable, walkable, and economically successful future. However, some of the language is vague and needs clarification, such as defining "strong pedestrian and transit", and what happens with old drive-throughs. What are the criteria for establishing areas where "strong pedestrian and transit orientation is desired"? What incentives will be available, and what happens with city owned spaces? Can the City pass ordinances to enforce development to be more pedestrian friendly?

Built Environment Measure E-5 "supports infill growth." However, the actions outlined are vague and unquantifiable. Words used are "prioritize", "focus", "accommodate", "include", "enable", but the actions are not quantifiable or enforceable. No specific outcomes are defined the document characterizes the measure as "supportive" and projects no associated GHG emission reductions. We can only read this as unwillingness on the part of the City to take decisive, effective, and necessary actions. We see lost opportunity. Land use patterns should change as City priorities change. If land use decisions continue to be driven by narrow, short-sighted financial contingencies, we can expect only more sprawl and soaring Vehicle Miles Traveled (VMT).

Rather than "promote infill" the City should disallow sprawl development. Developers operate within allowed parameters. Homeowners modify their properties according to zone and code requirements. Developers and homeowners respond to incentives. Voluntary compliance is preferable, but in the absence of sufficient incentives, the City must mandate climate friendly choices. This is the only reasonable choice in the context of climate crisis. 85% of current regional VMT rates should not be considered acceptable for new development.

When establishing Sustainability and Carbonization Standards in LUP-A.5, the City commits to evaluating best practices for decarbonization in our infrastructure but does not set a timeframe for completion. Nor does it set criteria, or even commit to the recommendations from the evaluation to be implemented. Other recommendations to the following sections:

- M-1.39 To be able to fund shared use paths throughout Sacramento, the City must reduce lane miles to (1) encourage residents to use an alternative form of transportation, and (2) to reduce wear-and-tear on City roads.
- M-3.1 Most neighborhoods are already established within Sacramento. Describe how street trees be included in neighborhoods that are already established, especially those in heat islands.

- M-4.3 The City commonly cites its Vision Zero plan but does not identify clear steps or funding to reach that goal. Little work has been done to reduce speeds through slow street design features, the most effective way to make streets safer. The City has many streets that need improvements to make them safer.
- M-A.10 Addresses street design standards. The City must ensure these design standards are aggressive to address the heat island effect and the safety of cyclists, walkers, and other AT.
- M-A.3 We have studies from Vision Zero, but these corridors are dangerous and continue to be dangerous year after year. Please do something about it instead of studying it yet again. Bollards. Cones. Anything.
- M-3.2, M-4.2 There must be goals for minimizing driver speeds. The City should set new speed limits for residential areas and the rest of the city to improve safety of AT. State what they will be.
- Traffic Calming – State how the City will determine which methods are the best to use and establish a goal for traffic calming. FB-LUP We want safer, more walkable streets. As a positive example, North of 14th and Stockton, there are many stores that sit against the sidewalk. This is great! We need more of this so that people who walk can get to stores without having to cross hot, empty parking lots.
- Other considerations for M sections – More bike parking needs to be visible and available to prompt residents to bike instead of driving. Bike parking should follow best practices and be convenient .

Funding is the biggest challenge the City faces for sustainable planning and development, and this is identified in M-1.41. Roads are expensive. At every opportunity the City should consider how to reduce spending on repaving roads, reduce lane miles and increase density. Alternate modes of transportation are encouraged by the actions set out in M-4.8 and YPRO-1.21. Comfortable detours would significantly reduce the burden on people using AT, and more trees would improve comfort while walking and biking, especially in historically disadvantaged neighborhoods.

Equity is a major goal in the *Considerations for Achieving Carbon Neutrality* section: "Sacramento's under-resourced communities are likely to face the greatest impacts from climate change and are Sacramento's communities with the fewest resources in terms of ability to harness technology for adaption" (73). **With this consideration, the goals outlined in the CAAP should be equitable and provide the most opportunity for our most vulnerable residents.**

Our current transportation patterns and development sprawl are the product of historical land use decisions. Given sufficient political will and leadership, the City could alter historical land use patterns to achieve reductions in GHG emissions and a more livable city.

Built Environment and Housing

To meet the goals set out in LUP-A.9, the City must rezone many neighborhoods to allow for mixed use commerce such as grocery stores, restaurants, coffee shops, and other light commercial uses to encourage walkability. This can be encouraged by providing sufficient urban canopy and utilizing native and climate-adapted plants, as outlined in (FB-ERC-1,ERC-3.2, and ERC-2.4). More Detail can be provided about how this would be done. Many of these changes can be made by the City Council passing an ordinance allowing the changes.

In FB-ERC-1, the City needs to invest in Fruitridge and Broadway because they are historically underserved neighborhoods and lack a substantial tree canopy. More trees need to be planted in this area immediately, and the City needs to plant trees near walking spaces using creative means, such as cutting into the street near the walking area for placement. This would have an added benefit of slowing traffic and improving pedestrian safety. This is preferable to trees planted in street medians, as these trees provide little sidewalk shade. Additionally, the City must take immediate action to increase parking lot shade to reduce the heat-island effect in all neighborhoods in Sacramento (ERC-3.10) through planting trees or covering lots with solar panels.

Finally, various land use maps (Land use diagram, maximum FAR diagram, and minimum density diagram) need to reflect the language set out by the GP to increase transit-oriented development and density near light rail stations in LUP-2.4, LUP-4.1, LUP-4.4, LUP-4.5, and LUP-5.3.

Water

ERC-3.9 works to conserve our natural resources, stating “The City shall encourage appropriate watering practices and irrigation to minimize needed water use and support healthy tree growth; support responsible tree irrigation during droughts to minimize tree stress and loss; and convert irrigation in parks and streetscapes where needed.” The City needs to improve education and outreach on these practices, and to incentivize conserving valuable drinking water. What measures/goals will the City use?

Transportation – Active Transportation

The City establishes that in M-1.3 that it "shall plan and make investments to foster a transportation system that improves the health of Sacramento residents through actions that make AT, non-motorized modes, high-occupancy, and zero emission vehicles (ZEVs) viable, attractive alternatives to the private automobile.” Incentivizing non-Single Occupancy Vehicles (SOV), which includes both cars that use gasoline and electric cars such as ZEVs, is an important step in transforming the way residents move around, but this is diluted by including ZEVs in the list of investments. ZEVs should be their own line item, as there have been decades of infrastructure built around SOVs.

However, AT needs to be the highest funding priority. In M-1.4, throughput is incentivized, but not specified. More concrete information is needed about what “prioritiz[ing] person throughput” means, what types of “more efficient travel modes” are, and what the threshold for success is. Transportation also is identified as a major emissions contributor; it contributes 57% of the Green House Gas (GHG) emissions within Sacramento, and the CAAP stresses the importance of drastic changes in this sector. Mobility is a vital right of every resident, and the CAAP states that AT and Transit & Shared Mobility (TSM) are the keys to achieving carbon neutrality. Unfortunately, the target date of 2045, is too far out to have a significant impact on the wellbeing of residents in the coming decades.

Street space is extremely limited in Sacramento, and it is not possible to make every street a complete street. Even so, the City needs to identify how they want people to travel and prioritize which street designs and standards are the most conducive to this (M-1.5). For example, because AT takes more physical energy, in an effort to encourage it the City should allocate direct routes to high travel locations, such as downtown, to AT only. Because less energy is needed to use SOV, parking for destinations, such as for central city, should be rerouted outside of the grid with the implementation of a “Park-and-Ride" system. This would increase the safety for walkers downtown and increase foot traffic to small businesses, which improves tax revenue. This also assists in reaching our Vision Zero goals. M-1.11 ties into the action above by stating, "The City shall strive to increase bicycling and walking citywide so that it can meet its equity, reduced vehicle miles traveled, and sustainability goals.” However, the wording for this item is extremely weak with the inclusion of “shall strive.” The City must set specific, measurable goals to increase AT citywide.

M-1.12 is equally non-specific. It states “the City Shall foster additional walking and bicycling connections to light rail stations and strengthen existing connections to enhance first/last-mile connectivity...," and this is restated in M-1.25. The language used in this measurement is weakened by the use of “shall foster” instead of “will create” or “will prioritize.” M-1.17 and M-1.18 identify two other areas that limit bikability, but the commitment in the language is non-committal and vague. The City should prioritize funding from the general fund to build this infrastructure, the same way it does for roads used by SOVs. Likewise, M-1.18 must remove "whenever feasible” from the action item. Bikes and cars should be separated to prevent fatal injuries. This is vital for reaching our Vision Zero goals.

M-1.13 does not have language that commits to generating revenue for small businesses through walkability. Again, the City will "promote walking by including design elements" rather than prioritizing walking by implementing, wherever possible, the elements identified. Shade trees, wider sidewalks, and crossings are all part of walking facilities identified in M-1.14. The City only identifies grant funding to build these features. If we only built or repaved roads with grant funding, we would have far fewer roads in our city and people would be severely hampered in traveling. Walking should be a priority, and walking should be safe. Again, M-1.19 uses weak language that the City will "prioritize designs that encourage walking" rather than learning from the design principals for safe walking that other communities have identified, such as the Global Designing Cities Initiative.

Improving access to transit is another admirable goal, and M-1.6 states "the City shall design buildings, the public realm, streets, and pedestrian access to integrate transit into existing and proposed developments and destinations such as employment centers, commercial centers, major attractions, and public walking spaces to improve access for users by transit," but does not establish what the City will be willing to do to make these changes. The most straightforward way to solve access to transportation for users is to create frequent and reliable service. While the City does not run SacRT, it is responsible for the streets and must work with SacRT to establish Bus Rapid Transit (BRT) corridors throughout the City. This is the only way to fulfill the City's goal to plan the transportation system with equitable outcomes and investments (M-1.9). The GP needs to commit to incentivizing transit use throughout Sacramento and return the streets to people.

Unfortunately, the CAAP has not incorporated significant changes from the last set of comments. Actions such as TR-1.4 are still cited in the plan even though people will only use AT facilities if they feel safe doing so. Many residents do not feel safe using AT because of speeding cars on our streets. TR-2.2 and TR-2.3 do not clarify how they will develop parking maximums or encourage expansion of reliable transit and must provide more detail. And some actions, such as TR-2.4, TR-2.5, and TR-2.10 can be facilitated by the City closing roads to SOVs

TR-1.5 identifies a need - securing ongoing funding for AT programs. This must be a priority. Historically, there has been no general funding for AT in the yearly City budget. Whether or not someone drives, the City is using everyone's tax money towards fixing roads for SOVs, even if they do not drive, and yet the City does not invest in transportation that non-car drivers utilize. To achieve its goals, t**he City needs to invest heavily in AT.**

The methodology used to justify CAAP measures is sometimes speculative and naïve, this is especially evident in AT. The AT Measure TR-1 seeks to reduce GHG Emissions through improvements to infrastructure, with a goal of increasing AT mode share by 200%. By way of evidence, the document summarizes the characteristics of cities which bear some similarity to Sacramento but enjoy a higher AT mode share. We learn many of these cities "do not just build infrastructure. They also require car drivers to pay their own way with higher parking fees, gas taxes, and excise taxes on new vehicles. These cities also incentivize dense multifamily development." (Appendix C, 20). We also find the successful cities have other differences including demographic, socioeconomic, climactic, and political. Despite the many differences between Sacramento and these cities, the analysis relies exclusively on infrastructure and the long-term policy to "encourage" infill to alter longstanding transportation patterns. "Assuming that bike lane mileage, density, and city population are directly correlated with bicycle mode share, Sacramento could expect to see a similar level of bicycle mode share that Antwerp saw…" (Appendix C, 20). Correlation is not causation.

AT Measure TR-1 is simplistic and unsubstantiated. It is likely the proposed improvements to infrastructure will contribute in a positive way to AT. But we have no reason to conclude it will be sufficient or result in the targeted decreases in GHG emissions. AT Literature suggests such predictions are problematic. "…Measuring bikeability (is) extremely challenging and geographically specific, as extrapolating the methods in one city to another may not match reality, and factors affect each place differently". Factors influencing cycling include

distance, environmental awareness, convenience, the need to exercise, affordability, bikeway exclusiveness, bikeway density, time of day, weather conditions, theft risk, trip purpose, and social status. Evidence suggests bicyclists feel safer and are more likely to cycle when there is a high density of cyclists. There are socioeconomic factors as well, and the City must research interdisciplinary perspectives such as those found in the *Built environment bikeability as a predictor of cycling frequency: Lessons from Barcelona* (December 2022).

Improving Sacramento's AT infrastructure will provide valuable and desirable co-benefits to residents. We are unequivocally in support. But cities that have achieved high AT mode share have demonstrated commitment through significant modifications to infrastructure, land use, fee structures, and taxation to achieve it. We are deeply disappointed to see the City promote simplistic actions rather than grapple authentically and realistically with the complex underlying issues.

Transportation – Transit

Many of the Drafts' measures, specifically in the CAAP, require the action of entities outside of the City's control. The Drafts list SacRT, SMUD, SACOG and others as the lead agencies for many actions. Except for SMUD, we know of no established contracts or agreements. No evidence is provided that substantiates the inclusion of these measures per CEQA guidelines. The measures are neither proven nor enforceable. For example, in Measure TR-2.4, the City plans to "collaborate (with SacRT to) implement increased transit services and expanded service lines." In measure TR-2.8 the City will "support SacRT efforts to secure funds." Support isn't defined. The sources of funding have not been identified. The feasibility of the City's plans for SacRT is unknown.

We agree that the City must prioritize collaborating with SacRT and provide the public infrastructure to support high-frequency transit service in the community. The City can implement street designs, etc. to get riders (M-1.20). The City cannot meet its goals in M-1.22 if It does not take drastic steps to improve the streets for transit. For example, the City could facilitate closing direct route surface streets to through traffic, but allow Bus Rapid Transit, biking, and walking along those corridors. This would equalize the time it takes to get to a destination, which would incentivize transportation outside of SOVs. We need better than just "supporting transit by incorporating features" that will improve transit reliability. We need a firm investment in transit priority infrastructure (M-1.23 and M-1.24). M-A.8 addresses BRT down Stockton Boulevard which is the sort of vision we need in order to adjust how we move around the City. Unfortunately, this goal is caveated by "as funding is available." This is an area where the City needs to change priorities and change what types of transportation it invests in. Reforming our current infrastructure to prioritize non-SOV transportation is not only vital for improving safety, but it is the fiscally responsible decision. Daily wear and tear from SOVs, especially the even heavier ZEVs, costs the City millions in deferred maintenance. The vision for Stockton Boulevard should be implemented to other major corridors, such as Fruitridge Road, Broadway, and Del Paso Boulevard.

Measure TR-2 calculates reductions in GHG Emissions resulting from unspecified improvements to the SacRT system. No detailed plan is stated. Emissions reductions cannot be calculated in the absence of a defined plan. GHG emission reductions can't reasonably be derived from a general intention to improve transportation and increase density. Increasing the frequency, location, convenience, and perceived safety of public transportation is necessary to increase public transportation mode share. We are unequivocally in support. But changes in land use and other policies will be required to change transportation patterns. We are looking to the City to adopt a more evidence-based comprehensive approach to transportation.

Providing free or discounted fare for certain groups of transit riders, such as students, low-income residents, and seniors is a wonderful program, and the City should keep this as a priority to change how youths see transportation (M-2.7).

Promoting Shared ZEVs across Sacramento is a great bridge as we reduce the need to own an expensive SOV, and M-1.29 identifies this. Unfortunately, as the Car Share Program is no longer available, no further reductions in GHG emissions should be attributed to the program (Measure TR-2.6), and yet, the CAAP still refers to it. While the AAA Car Share program, also known as GIG, was successful in reducing VMT, the program has been terminated due to insufficient participation rates. Whatever support the City provided was not enough to make it commercially viable. Anecdotal evidence suggests the cancellation has resulted directly in unplanned and unwelcome vehicle purchases. Had the City worked more closely with AAA the outcome may have been different. This calls into question the role of city "support" in promoting climate friendly programs. Is there adequate staff to monitor these programs, and does the City have the resources to intervene when necessary? Beyond the non-committal language in M-2.1 and M-2.4 stating the City "should promote" use of alternative transportation, it ignores that 52% of all car trips in the US are 3 miles or less, and 28% of those are 1 mile or less (Bureau of Transportation). Residents of Sacramento drive because it is not safe or convenient to travel in any other way even if our destination is only one mile away. The City has the power to change this, though. M-2.6 and M-2.8 "Transit/Event Coordination. The City shall encourage collaboration between transit partners and event producers to promote awareness of additional and timely transit service before and after large events."

Transportation - SOVs and ZEVs

The Drafts declare that we need to reduce SOV, but don't adequately prioritize shifting people's behaviors. People need viable alternatives that meet most of their needs reliably (8-15). Regional Transit should not just be for commuting. **It is vital for everyone, especially residents who are blind or disabled, to meet their daily needs** including getting groceries, going home, to work, to the gym, to events, and to social gatherings. A major limitation is that the City has not incentivized people using transportation other than SOV up to this point. This can change if ample parking is removed, remaining parking is on the outskirts of town, car speeds are reduced, and toll roads are implemented. Parking supply, as stated in M-2.14, does not disincentivize additional parking, it only acknowledges that there is a correlation. What are the specifics of what the City will do to significantly decrease VMT to cultivate a safe and walkable City where residents are encouraged to window shop from the sidewalks and wander into businesses they would have passed if they were driving?

In TR-3.7 in the CAAP, the City identifies that having access to chargers for ZEVs for people who otherwise do not have them at home is important, and it is. However, it is a better investment of the City's funds to put the money towards AT instead of investing in new SOV infrastructure, even if they are ZEVs. The funding section in the CAAP identifies AT as a high cost because it accounts for the years of funding that haven't been put into AT. Entire bicycle and walking networks need to be created because space has never been dedicated to it. On the other hand, new ZEV infrastructure is rated as a low-cost option but fails to account for the wear and tear on our roads, which require costly pavement, and the maintenance of the traffic lights, signs, signals, parking space, and lost revenue from the land that is dedicated to parking or a road instead of businesses. Not least of which, this does not account for the deaths that cars, ZEV or not, are responsible for. We cannot afford to continue prioritizing and investing so heavily in any SOV.

Connectivity

An interconnected City is vital for addressing our transportation emissions, but LUP-2.2 and 2.3 do not establish how the City will establish and encourage transit and AT, nor is there a commitment to any steps to creating this vital infrastructure. LUP-2.5 goes on to discuss the design for connectivity but does not establish what will happen to the current connections and how the City will build them out. The City needs to determine how to improve these connections so that people who do not normally use AT will find them comfortable and convenient to use.

Recommendations

The Drafts' chapters are intertwined with each other and a solution for one is likely to be a solution for many. Because of this, similar topics should address all parts of the Drafts where they are brought up.

The Drafts consistently use vague, non-committal language and/or caveats otherwise powerful statements. Words such as, "encourage," "promote," "should," "explore the feasibility," and "shall foster" must be eliminated from this document and replaced with words that reflect the necessary changes we need in our communities, examples of such language are "will," "implement," and "actively partner with."

We understand these are long-term planning documents, and that the Drafts do not prescribe the specific solutions to the challenges the City faces in the upcoming years. However, this guideline document needs to prioritize the changes that must happen to create the livable image of the future Sacramento described in its pages. To achieve this, the Drafts must produce a significant shift in:

1. Sacramento's transportation priorities. The City has invested heavily in expensive, car-centric infrastructure over the past several decades. This has led to a less safe, less walkable, and less desirable downtown and city. Return streets to people.
2. Funding priorities. Many of the goals set out in the Drafts are under or completely unfunded. The City must allocate regular General Funds to pay for these necessary aspects of life, such as housing and transportation. Further, if the CAAP is implemented, the City must provide adequate staffing.
3. Building density. Increase the FAR across Sacramento to 2.0, encouraging communities to build up over time rather than precipitate the rapid growth that causes displacement.
4. Quantifiable, time sensitive goals and measures. Recommend concrete, measurable objectives in each IA section that boldly addresses the issues at hand. This must include Key Performance Indicators (KPIs) and a specific deadline for each.
5. Update the following diagrams to reflect the FAR stated in the GP: (1) Land Use, (2) maximum FAR, and (3) minimum density.
4. Establish goals and measures commensurate with the severity of our circumstances. "With less than 30 years remaining to reach this goal [of carbon neutrality by the middle of the century], the CAAP sets new and ambitious targets for the City" (1). This goal clearly establishes that "ambitious targets" are needed to meet carbon neutrality by 2050. However, we are already feeling the devastating effects of climate crisis with oppressive heatwaves, continual drought, wildfires and water shortages. Considering current reality, a goal of 2050 will be too late.

Far too many of the City's decisions appear guided by political considerations. If measures are voluntary and unenforceable, virtually no one will be inconvenienced, and nothing will change. The addition of shade trees, bike paths, and walkways will always be welcomed. But real change, that changes required to avert climate disaster are controversial and uncomfortable. Both the housing crisis and climate change are happening now and need to be addressed. To make the level of change necessary to address these problems, the City needs to act boldly and with urgency. The City must commit significant funds to achieve these goals. These actions must be part of a comprehensive plan that focuses on shifting how we move and where we live in Sacramento. By avoiding real change now, the City is ensuring far greater controversy and hardship in the years to come.

Sincerely,
/s/
Elizabeth Barrett
Member, Citizens' Climate Lobby, Sacramento Chapter
/s/
Kay Crumb
Member, Citizens' Climate Lobby, Sacramento Chapter

cc: Darrell Steinberg, Mai Vang, Caity Maple, Katie Valenzuela, Karina Talamantes, Lisa Kaplan, Rick Jennings, Sean Loloee, and Eric Guerra

CIVIC THREAD

August 21, 2023

City of Sacramento Department of Long-Range Planning
300 Richards Boulevard, 3rd Floor
Sacramento, CA 95811

RE: Safe Routes to School Policy Recommendations for City of Sacramento General Plan 2040 Update Public Review Draft

Dear City of Sacramento councilmembers, staff, and consultant team,

Thank you for the opportunity to provide comments on the General Plan 2040 Update Public Review Draft. Civic Thread commends the staff and consultant team's efforts to authentically reflect communities' priorities and values from previous visioning phases.

The Draft Plan offers promising paths forward for a healthier, more sustainable, and more equitable Sacramento. Thus, as today's children will be inheriting this 2040 version of Sacramento, youth health, safety, and wellbeing must be explicitly centered throughout the Plan. Moreover, many of the issues the Plan seeks to address, including bicycle and pedestrian safety and climate-related health outcomes, disproportionately impact youth as they are amongst our most vulnerable road users and EPA-designated sensitive groups.

A 2014 study conducted by the UC Davis Center for Regional Change found that student physical health (including chronic asthma) was "the most frequently identified factor contributing to chronic absenteeism" among Sacramento City Unified students, particularly for students of color.[1] Trends in youth safety outcomes are equally concerning. As stated in the City's Vision Zero School Safety Study, "**Sacramento had the highest number of speed related traffic fatalities and the most collisions resulting in fatalities or serious injuries involving pedestrians under the age of 15 *of any city in California***."[2]

While Vision Zero can be a great strategy for improving roadway safety, complementary city-wide approaches, such as Safe Routes to Schools, are needed to more holistically advance meaningful, long-term modeshift and improved public health outcomes. Safe Routes to School (SRTS) is a national movement that aims to make it safer and easier for

[1] Factors Influencing School Attendance for Chronically Absent Students in the Sacramento City Unified School District (SCUSD), Chronic Absenteeism Issue Brief Series, UC Davis Center for Regional Change (July 2014)
[2] City of Sacramento Vision Zero School Safety Study, p. 2 (February 2021)

students to walk and bike to school through a comprehensive framework known as the "6 E's": Evaluation, Education, Encouragement, Engineering, Engagement, and Equity.[3] However, city-wide Safe Routes to School programs or policies do not currently exist. **Thus, Civic Thread urges the City of Sacramento to join the growing number of municipalities across the nation, including the City of Rancho Cordova, Marin County, the City of Boise, and the City of Portland, in adopting strong Safe Routes to School plans and policies.**

Within the context of such a complex and cross-cutting plan, adopting Safe Routes to School elements offers a cohesive and comprehensive framework to advancing many of the City's climate, modeshift, equity, safety, and public health goals. These numerous co-benefits SRTS directly provides for youth are by no means isolated to students and school communities. For instance, encouraging students and families to walk and roll to school creates **public health benefits for the larger community** through increased daily exercise and decreased Vehicle Miles Traveled, as noted in a 2008 study of 37 large urban areas.[4] From a climate perspective, a region-wide Safe Routes to School pilot led by the Metropolitan Transportation Commission in the San Francisco Bay Area found an "average 4.8% reduction in greenhouse gas (GHG) emissions per student for trips one mile or less from school. If all students enrolled in public schools at all nine counties received Safe Routes programming, it could **reduce as much as of 5.3 million pounds of GHG emissions from transportation due to school trips**."[5]

Recommendations are outlined below to ensure the Final General Plan 2040 Update includes robust, explicit measures and policies to safeguard youth health, safety, and mobility outcomes *and* advance city-wide sustainability and equity goals. Please note a bulk of the recommendations below were adapted from "Model General Plan Language Supporting Safe Routes to Schools," a collaborative effort between CA4Health, ChageLab Solutions, Public Health Institute, and Centers for Disease Control and Prevention, and should be considered **best practices with respect to policy, programming, and funding guidance**.[6] Furthermore, the recommendation to adopt city-wide Safe Routes to School

[3] Learn more about Safe Routes to School here https://www.saferoutespartnership.org/safe-routes-school/101
[4] Watson M, Dannenberg AL. "Investment in Safe Routes to School projects: public health benefits for the larger community." Preventing Chronic Disease, Volume 5, Issue 3, July 2008.
Available at http://www.cdc.gov/pcd/issues/2008/jul/pdf/07_0087.pdf
[5] MTC's Climate Initiatives Program Evaluation Regional Safe Routes to School Program (FY 2009-2010 through FY 2011-2012), https://mtc.ca.gov/sites/default/files/MTC_Regional_SRTS_Evaluation_Report_Final.pdf
[6] "Model General Plan Language Supporting Safe Routes to Schools: Support for Proposing And Adopting Strong Policies" https://www.changelabsolutions.org/product/model-general-plan-language-supporting-safe-routes-schools

policies and programs is consistent with the City's Active Transportation Commission's 2023 Recommendations to Council.[7]

Recommendations are separated into the following sections and are categorized by Plan Elements:

- Recommendations for Policy Additions: Recommendations for additional goals, policies, and actions to address *current gaps*.
- Recommended Amendments to Existing Policies: Recommendations for amendments to *existing draft goals, policies, and actions.*
- Recommendations for Council Adoption: Recommendations for council adoption of draft goals, policies, and actions *as is.*

Justification statements and supported General Plan goals and policies are summarized at the end of each Element.

Recommendations for Policy Additions

Recommendations below are intended to address *current gaps* in existing draft goals, policies, and actions to better support youth health, safety, and mobility outcomes.

ENVIRONMENTAL RESOURCES AND CONSTRAINTS

Recommended Environmental Resource and Constraint policies are outlined below as additions to Goal ERC-8 "Improved resilience to the effects of heat." "X" denotes a policy number placeholder.

- **ERC 8.X Cool Schools.** The City shall work with incorporated school districts to facilitate phasing in cooling techniques into local public school facilities, including the application of cool roofing materials, cool paving treatments, landscaping, and shading amenities.

Recommended ERC Goals and Policies Justification:

Backed by extensive empirical evidence, numerous federal agencies, such as the US EPA and CDC, classify children as a vulnerable group to the effects of extreme heat events due to a range of developmental and physiological factors.[8] Children spend much of

[7] Active Transportation Commission 2023 Annual Report, City of Sacramento (August 2023)
[8] Extreme Heat Effects on Children and Pregnant Women (US EPA); Heat Waves Affect Children More Severely (Scientific American, 2022); Protecting Disproportionately Affected Populations from Extreme Heat (US CDC)

their time and week at school and, thus, ensuring school campuses (including outdoor areas) are designed or retrofitted to appropriately bear the effects increasingly frequent and severe heat events will be critical to protecting students' health and safety.

General Plan Goals and Policies Supported:

- **ERC.8** Improved resilience to the effects of heat.

ENVIRONMENTAL JUSTICE

Recommendations to embed more robust and specific school community-oriented Environmental Justice policies are outlined below. "X" denotes a policy number placeholder.

Safe and Sanitary Housing

- **EJ-3.X Dignified Housing and School Co-Location.** The City shall coordinate with incorporated school districts and developers to prioritize locating new housing near existing and planned schools; especially housing that is multi-family, mixed-income, part of mixed-use development, and affordable.

Civic Engagement

- **EJ-4.X Robust School Engagement.** Together with incorporated school districts, the City shall provide opportunities for community members to comment on and participate in decisions regarding new schools, school closures, school expansions or renovations, and roadway improvements at and around school campuses.
- **EJ-4.X School Capacity Building.** The City shall provide trainings to incorporated school districts and school community members on city planning processes and community-based planning tools (i.e., walk and bike audits, 311 services, Speed Lump Program, etc.), particularly as they relate to traffic calming and improvements to pedestrian and bicycle facilities (i.e. sidewalk gap closures, stop signs, crosswalks, traffic signal timing, etc.).
- **EJ-4.X Safe Routes to School Technical Assistance.** The City shall partner with local Safe Routes to School technical experts to provide technical assistance to City staff, school district staff, agency partners, and youth-serving non-profit partners to increase capacity of local stakeholders to implement sustainable, effective Safe Routes to School programming as needed.

Accountability

- **EJ-4.X School District and Agency Systems Integration.** The City shall regularly share data, information about potential developments, and planning projections with incorporated school districts. The City shall take steps to encourage collaboration and support regular meetings between school districts and City of Sacramento personnel. Collaborations should include school board members, school superintendents, school facilities managers, City and County planners, elected officials, parks and recreation personnel, and school community members (i.e. students, parents/caregivers, staff).

Investment Prioritization

- **EJ-5.X Equitable School Zone Investments.** The City shall prioritize street infrastructure and safety improvements around schools and on routes to school with particular emphasis on Title I designated school sites and school sites located within Disadvantaged Communities.[9]

Recommended EJ Goals and Policies Justification:

Parents and caregivers are experts in the built environments surrounding their students' schools as many make countless daily trips over the course of several years. Safe Routes to School engineering-based activities, such as arrival/dismissal observations and walk audits, offer great entry points for community members into the planning process because conversations are happening in and about places in which they are intimately familiar. Involving school communities in this way helps to ensure City planning processes are authentically reflective of residents' lived experiences and priorities.

In effect, engaging Title I and Disadvantaged Community school sites in planning processes through Safe Routes to School programming becomes an equitable engagement and investment strategy. Civic Thread has supported numerous schools throughout the Sacramento with conducting walk audits that have aided the City in securing millions in funding for critical active transportation investments in Disadvantaged Communities.[10]

Coordinating this level of cross-cutting investment and planning will require intensive collaboration and systems integration within and across City departments and other

[9] "Title I designated schools" as they are defined by the California Department of Education; "Disadvantaged Communities" as they are defined by Senate Bill (SB) 535 (De León, Chapter 830, Statutes of 2012)
[10] "9 Sacramento-area schools receive $2.2 million for walking, cycling safety improvements" (ABC 10, Aug. 2022)

stakeholders. Bringing in local technical Safe Routes to School experts will build the City's capacity to establish and implement jurisdiction-wide Safe Routes to School programs and policies, particularly in the near-term.

General Plan Goals and Policies Supported:

- **EJ-4** Active participation of all segments of the community – particularly historically underrepresented groups - in civic life and in the development and implementation of solutions for neighborhood priorities.
- **EJ-5** Investments that address long-standing inequities, empower disadvantaged residents, and build neighborhood resilience.
- **M-1.9** Equitable Processes and Outcomes.
- **M-1.10** Community Engagement.

MOBILITY

Recommended Safe Routes to School goals and policies are outlined below as a proposed seventh section ("M-7") to the Mobility Element. "X" denotes a policy number placeholder.

M-7: Provide children with safe and convenient opportunities for walking and bicycling to school to encourage exercise and healthy living habits, reduce the risk of injury from traffic collisions near schools, and decrease morning commute traffic, air pollution, and fossil fuel consumption.

Active Transportation

- **M-7.1 Walk and Bike to School Days.** The City shall promote active transportation events such as Walk and Bike to School Days on a city-wide basis to encourage participation and increase community awareness and safe practices. Walk and Bike to School Days will be coordinated with Walk and Bike to Work events as applicable.
- **M-7.2 School Active Transportation Campaigns.** The City shall promote walking, bicycling, or other forms of active transportation via educational and encouragement campaigns in coordination with incorporated school districts, local youth-serving organizations, etc.
- **M-7.3 Walking School Buses and Bike Trains.** The City shall partner with incorporated school districts to establish Walking School Bus/Bike Train programs at elementary and middle schools.[11]

[11] More information on Walking School Buses and Bike Trains can be found at wallkbiketoschool.org here

- **M-7.4 Youth Active Transportation Education.** The City shall support incorporated school districts in adopting, developing, and incorporating age-appropriate active transportation education into curriculum, ensuring that students learn the skills, laws, and safety practices involved in walking, bicycling, and rolling.
- **M-7.5 Mobile Bike Repair and Donation Program.** The City shall partner with local bicycle advocacy organizations, mobile bike repair providers, and local bicycle businesses to host "pop-up" bicycle repair and maintenance clinics at Title I designated school sites and school sites located within Disadvantaged Communities. Partnerships should also be made with local helmet and bicycle donation programs and providers to provide helmets and bicycles to students in need at no cost. Events should be aligned with Back to School nights and May is Bike Month activities.
- **M-7.6 Teen Safe Drivers.** The City shall work with incorporated school districts to address opportunities for education of adult and teen drivers on the importance of safe driving and the safety needs of people walking, bicycling, and boarding or exiting transit; encourage substantial integration of these topics into curriculum for school-based drivers' education and training programs.
- **M-7.7 School Wayfinding Pilot.** The City shall partner with incorporated school districts, local graphic design firms, and/or BIPOC artists to develop a pilot city-wide wayfinding program to support students and families in identifying safe routes to schools, parks, libraries, and other youth-serving destinations. Pilot programming shall include incentives and programming to increase use and familiarity of wayfinding paths and signage, such as QR codes and scavenger hunts.
- **M-7.8 Safe Walking and Biking Maps.** Working in tandem with the School Wayfinding Pilot ("M-7.7"), the City shall work closely with incorporated school districts to identify and create and distribute safe walking and biking maps to schools, parks, libraries, and other youth-serving destinations to students and families in target languages.

Transit Service

- **M-7.9 School District and Public Transit Systems Integration.** The City shall coordinate closely between local transit providers and incorporated school districts to align transit service schedules and transit stop locations with school sites and school schedules (particularly at the middle and high school levels).[12]

[12] Many local school districts have indefinitely suspended general education bussing due to transportation budget cuts. A large number of middle and high school students take public transit as their only option to get to school. However, **bus stop locations and servicing (including timing, frequency, and transfers/route planning) often do not align with school locations and schedules, causing students to be chronically tardy or absent.** Tardiness due to transportation challenges is typically not classified as an excused absence by school district attendance policies and, thus, can have significant consequences if students accrue a certain number throughout the year, including barring students from walking at graduation.

- **M-7.10 Youth Transit Literacy.** The City shall coordinate closely between local transit providers and incorporated school districts to enhance transit education and access for youth, including sharing resources, promoting Sacramento Regional Transit's "RydeFreeRT" program, leading "transit field trips" to familiarize students with local transit systems, etc.

Zero-and-Low Emission Vehicles

- **M-7.11 School Bus Fleet Electrification.** The City shall work closely with incorporated school districts to support electrification of school bus fleets.[13]

Safety

- **M-7.12 Safer School Zones.** The City shall encourage incorporated school districts to make infrastructure changes to decrease conflicts between cars, buses, pedestrians, bicyclists, and others, by separating drop-off/pick-up zones from walking and biking routes, creating safe paths for walking and biking through parking lots, and/or providing separate entrances for those walking and bicycling at existing sites and in designs for major renovations and new builds.
- **M-7.13 Decrease Mode Conflicts.** The City shall encourage incorporated school districts to make policy changes to decrease conflicts between cars, buses, pedestrians, bicyclists, and others by maintaining separate areas for school bus loading and unloading, releasing students who walk or bicycle from school earlier than students who are driven, and establishing remote drop off/pick up programs to decrease vehicle traffic in the school vicinity.
- **M-7.14 Crossing Guard Programs.** The City shall work with incorporated school districts and/or state-certified crossing guard contracting firms to implement a crossing guard program to improve safety on school routes and in school vicinities. City shall support school district staff in identifying critical intersections where crossing guards should be stationed. In the event contracting firms are not available, the City shall offer recurring state-certified crossing guard training courses and provide participants with state-mandated materials (i.e., high visibility vests, stop paddles, etc.).[14]

[13] Local example: Twin Rivers Unified School District . TRUSD's fleet of 40 zero-emission buses represents the largest deployment of zero-emission school buses in North America!
[14] More information on California School Crossing Guard Training can be found here

Maintenance and Funding

- **M-7.15 Strong and Sustainable Safe Routes to School Program Funding.** The City shall work with incorporated school districts and advocates to obtain funding for Safe Routes to School programs and infrastructure improvements from local, regional, state, and federal sources.[15]
- **M-7.16 Strong and Sustainable Safe Routes to School Facilities Funding.** The City shall identify and dedicate sources of funding for Safe Routes to School programs and bicycle and pedestrian facilities, such as general fund monies, sales tax funds, state gas tax subventions, development exactions/impact fees, or other funding mechanisms.
- **M-7.17 Strong and Sustainable Crossing Guard Program Funding.** The City shall identify and dedicate sustainable funding sources to supplement school district funding for implementation and maintenance of school crossing guard programs.
- **M-7.18 Safe Routes to School Coordinator.** The City shall identify and secure sustainable funding to establish a dedicated Safe Routes to School Coordinator position to be housed within the Public Works Department. The Safe Routes to School Coordinator shall oversee and advise on City-led Safe Routes to School funding, policy, and programming initiatives, including the Safe Routes to School Action Plan (see "M-A.X" below). During their tenure, the Safe Routes to School Coordinator shall explore funding opportunities to expand dedicated staff to increase the City's capacity to support jurisdiction-wide Safe Routes to School policies and programming.

School Transportation Demand Management

- **M-7.19 School District TDM.** The City shall support incorporated school districts with development and adoption of school district-wide Transportation Demand Management strategies and incentive programs catered towards staff, families, and students.
- **M-7.20 School Streets Pilot.** The City shall work closely with incorporated school districts to identify appropriate street segments to pilot a School Streets program at select Title 1 designated schools and school sites located within Sacramento's Disadvantaged Communities.[16]

[15] For more information on standard and creative funding sources, visit saferoutespartnership.org/resources/publications/funding

[16] More information and case studies on "School Streets" can be found at https://nacto.org/publication/streets-for-pandemic-response-recovery/emerging-street-strategies/school-streets/

Data-and-Tech Driven Solutions

- **M-7.21 Carpool, Walking, and Biking App Pilot Programs.** The City shall work closely with tech firms and incorporated school districts to support, pilot, and adopt innovative carpooling and Walking School Bus/Bike Train mobile applications.[17]
- **M-7.22 Safe Routes to School Program Evaluation.** The City shall coordinate with incorporated school districts to gather baseline data on attitudes about and existing levels of walking and bicycling to school through student tallies and parent surveys. Data collection will occur periodically to measure to evaluate programming and track progress.
- **M-7.23 Data-Informed Safe Routes to School Transportation Investments.** The City shall reference pedestrian and cyclist collision and demographic data available via U.C. Berkeley's Transportation Injury Mapping System's "Safe Routes to School Map" tool, ed-data.org, and/or other relevant data sources to prioritize transportation funding and improvements at and around school sites with significant collision hot spots located within Sacramento's Disadvantaged Communities.

Air Quality Education and Mitigation

- **M-7.24 Youth and Schools Sensitive Receptors.** The City shall collaborate with incorporated school districts and Sacramento Metropolitan Air Quality Management District to launch air quality education campaigns for caregivers and students highlighting the environmental and public health benefits of walking, bicycling, and rolling to school.
- **M-7.25 School Zone Anti-Idling.** The City shall encourage incorporated school districts to prohibit (or discourage) drivers from idling in the vicinity of schools; work with incorporated school districts to reduce school bus idling.

Plans and Programs

M-A.X City of Sacramento Safe Routes to School Action Plan. [18]

Led by the Safe Routes to School Coordinator (see "M-7.18"), City Public Works staff shall seek and secure funding (i.e., state and federal grants) to create and adopt a Safe Routes to School Action Plan for the City of Sacramento. The Action Plan shall be developed in close partnership with local Safe Routes to School experts, incorporated school districts, youth-serving non-profit organizations, and other key stakeholders. The Action Plan shall include an existing conditions assessment of the current funding, policy,

[17] E.g., https://carzac.com/

[18] Local example - refer to the City of Rancho Cordova's Safe Routes to School Action Plan (adopted 2017)

and programming landscape and current youth pedestrian and cyclist collision statistics. The Action Plan should establish clear goals, actions, responsible parties, and timelines. The Action Plan shall heavily emphasize strategies to support sustained, long-term engagement with funding and programming priority given to Title I designated schools and school sites located within Sacramento's Disadvantaged Communities. Annual progress updates shall be made publicly available during the duration of the Action Plan's established timeframe.

- **Responsible Entity:** Department of Public Works
- **Timeframe:** Near-term (2024-2029)

Recommended Mobility Goals, Policies, and Plans Justification:

As cited in the City's Vision Zero School Safety Study, Sacramento is effectively the most dangerous city in the entire state of California for youth pedestrians and cyclists. Within this context, it's not an exaggeration to say children and families must risk their lives to get to school. While Civic Thread commends the City's recent efforts to prioritize improvements around school sites through efforts such as the Vision Zero School Safety Plan and Transportation Priorities Plan. However, a robust, integrated effort beyond that of infrastructure investments is needed to fully address youth mobility, health, and safety outcomes.

While Vision Zero may include safety education campaign strategies, it does not include hands-on education, programming, or activations. A 2014 study of 801 schools across three US states and the District of Columbia found that Safe Routes to School education and encouragement programming *alone* led to a 7% increase in students walking and biking, while infrastructure investments led to an 18% increase. Thus, the study concludes, programs that incorporate education and encouragement activities *alongside* infrastructure improvements can see increases in walking or biking *of up to 43%*.[19] **Furthermore, Vision Zero includes law enforcement-led strategies, which is counter to Safe Routes to School's equity-driven, community-based philosophy**. Effective June 2020, the Safe Routes Partnership dropped Enforcement as one of the 6 Es of Safe Routes to School and added Engagement as the first E.[20]

Beyond infrastructure improvements and programming, non-police affiliated safety personnel, such as crossing guards, are needed to ensure last-resort protections are in

[19] Noreen C. McDonald, Ruth L. Steiner, Chanam Lee, Tori Rhoulac Smith, Xuemei Zhu & Yizhao Yang (2014)
[19] (cont'd) Impact of the Safe Routes to School Program on Walking and Bicycling, Journal of the American Planning Association, 80:2, 153-167, DOI: 10.1080/01944363.2014.956654
[20] Dropping Enforcement from the Safe Routes to School 6 E's Framework, Safe Routes Partnership (June 2020)

place in the event of dangerous driving behaviors. As of June 2021, Twin Rivers Unified School District, Sacramento City Unified School District, Elk Grove Unified School District, and San Juan Unified School District have not had any type of official district crossing guard programs due to a lapse in contract with a regional crossing guard contract provider.[21] Moreover, school staff are strictly and legally prohibited from performing official crossing guard duties. This puts students, staff, and families at tremendous risk when walking and biking, particularly during heavily congested morning and afternoon pick-up and drop-off times. In extensive parent and caregiver surveys Civic Thread has conducted at schools throughout the Sacramento Region, "safety at intersections and crossings" is always one of the top-cited barriers to allowing their student to walk and bike to school. The City can and should support school districts with providing this essential service, whether that be through funding, programs, and/or trainings.

In sum, dedicated, robust, well-funded Safe Routes to School programming is vital to advancing the City's modeshift and safety goals.

General Plan Goals and Policies Supported:

- **ERC-9** Climate leadership and bold action to achieve carbon neutrality by 2045, aggressively reduce emissions by 2030, and increase climate resilience communitywide.
- **EJ-1** Clean air, water, and soil with no segment of the community disproportionately burdened by environmental conditions.
- **EJ-4.2** Innovative Methods.
- **M-4** A Safer Transportation System.
- **YPRO-1.11** Enhancing Access to Parks.
- Climate Action and Adaptation Plan

PUBLIC FACILITIES AND SAFETY

Recommended Public Facilities and Safety goals and policies are outlined below to establish and support community-based approaches to youth violence prevention. "X" denotes a policy number placeholder.

PFS-1.X Community-based approaches to increasing personal safety of students walking, biking, and rolling to school.

[21] Many longtime Sacramento-area crossing guards are losing their jobs (Fox 40, July 2021)

- **PFS-1.XX: Safe Passage Pilot.** The City shall support development of Safe Passage pilot programs at Title I designated school sites and school sites located within Disadvantaged Communities.
- **PFS-1.XX Safe Passage Best Practices Review.** The City shall conduct a best practices assessment and literature review to identify national and international case studies of successful Safe Passage programs.[22]
- **PFS-1.XX Safe Passage Task Force.** The City shall partner with youth advocacy organizations, social service providers, incorporated school districts**,** and other relevant stakeholders to convene a Safe Passage Task Force that is responsible for developing and overseeing a Safe Passage Action Plan.
- **PFS-1.XX Safe Passage Action Plan.** As part of the Safe Passage Task Force, the City shall create and adopt a 2 to 5-year action plan that sets clear goals and steps for creating, implementing, and sustaining a Safe Passage pilot program. This shall be a component of the broader Safe Routes to School Action Plan (see "M-A.X").
- **PFS-1.XX Strong and Sustainable Safe Passage Funding.** The City shall identify and dedicate sustainable funding mechanisms to support the development and implementation of a Safe Passage Pilot program to cover associated costs, including, but not limited to, volunteer trainings and stipends, wayfinding materials, student incentives, etc.
- **PFS-1.XX Age-and-Culturally Appropriate Personal Safety Education.** The City shall partner with youth advocacy organizations, social service providers, and incorporated school districts to develop culturally- and age-appropriate curriculum to teach students about basic personal safety tips and violence prevention resources.
- **PFS-1.XX Safe Passage PBID Partnerships.** The City shall partner with local Property and Business Improvement Districts to engage business owners along routes to schools to participate in and support Safe Passage Programs.

Recommended PFS Goals and Policies Justification:

Data from extensive parent surveys conducted by Civic Thread are consistent with nation-wide studies that highlight "violence and crime" as one of the top five barriers to their children walking or biking to school.[23] Real and perceived exposure to violence can have major implications for lifelong physical and mental health issues for children, the impacts of which are fraught with racial and gender disparities.[24] A 2006 study found

[22] E.g., Chicago's 'Safe Passage' Curbs Street Violence Without Police, Studies Show (NPR, June 2019)
[23] "Identifying Factors Affecting the Number of Students Walking or Biking to School" (Safe Routes Partnership, Archives 1 - Traffic Congestion and Transportation Trends, 2009)
[24] "Taking Back the Streets and Sidewalks: How Safe Routes to School and Community Safety Initiatives Can Overcome Violence and Crime" (Safe Routes Partnership, n.d.)

40% fewer girls than boys walk to school.[25] In another study, 23% of Latino parents reported their neighborhoods were unsafe, compared with 8% of White parents.[26] What's more, fear of violence along routes to school doesn't always come from strangers, neighbors, or peers. For Black boys and teenagers in particular, fear of harassment and violence from the police can significantly influence perceptions of personal safety.

Routes to school can be where children are most vulnerable to crime and violence exposure as they are between two critical locations (home and school), often without the presence of trusted adults. Spearheaded by Chicago Public Schools, Safe Passage programs were created in response to these realities and have shown extremely promising trends in violence and crime reduction. A University of Illinois study, published in March by the Journal of Urban Economics, found **violent crime drops by 14% along streets with Safe Passage workers.**[27]

General Plan Goals and Policies Supported

- **EJ-4** Active participation of all segments of the community – particularly historically underrepresented groups - in civic life and in the development and implementation of solutions for neighborhood priorities.
- **EJ-5** Investments that address long-standing inequities, empower disadvantaged residents, and build neighborhood resilience.
- **M-1.9** Equitable Processes and Outcomes.
- **M-1.10** Community Engagement.
- **PFS-1** Law Enforcement and Crime Prevention
    - **PFS-1.3** Communication with Residents and Businesses.
    - **PFS-1.4** Community Programs.
- **YPRO-A.5** Violence Prevention and Youth Development.

YOUTH, PARKS, RECREATION, AND OPEN SPACE

Recommendations to embed more robust and specific youth-led initiatives policies are outlined below. "X" denotes a policy number placeholder.

Community Enrichment

[25] McMillan, Tracy & Day, Kristen & Boarnet, Marlon & Alfonzo, Mariela & Anderson, Craig. (2006). Johnny Walks to School—Does Jane? Sex Differences in Children's Active Travel to School. Children, Youth and Environments. 16. 10.1353/cye.2006.0038.

[26] Leadership for Healthy Communities, "Overweight and Obesity among Latino Youths," http://www. leadershipforhealthycommunities.org/wp-content/ uploads/2014/12/LHC_Latino_Factsheet_FINAL1. Pdf.

[27] "Chicago's 'Safe Passage' Curbs Street Violence Without Police, Studies Show" (NPR, June 2019)

- **YPRO-3.X Youth-Led Activations.** The City shall partner with Sacramento Youth Commission members, incorporated school districts, and/or local youth-serving organizations from Sacramento's Disadvantaged Communities to support youth-led park programming, park and school access campaigns (I.e., Bike to the Park Day, Walk to School Day, etc.), and park access audits. Participant youth organizers shall be fairly compensated for their time and efforts.

Recommended YPRO Goals and Policies Justification:

Programming and plans *for* youth need to be created *with* youth. Co-creating initiatives with youth not only helps to ensure programs feel relevant and fun for youth, involving them in the decision-making and planning process helps to build young leaders.

General Plan Goals and Policies Supported:

- **EJ-4.1** Meaningful, Relevant Engagement.
- **EJ-4.2** Innovative Methods.
- **EJ-4.4** Capacity Building.
- **EJ-4.8** Community Ownership and Accountability.
- **M-1.11 - M-1.19** Active Transportation
- **YPRO-3.5** Youth Participation.
- **YPRO-4.4** Youth-Centered Events.
- **YPRO-A.2** Park Audits.

Recommended Amendments to Existing Policies

Recommendations below are intended to enhance the potential of *existing goals, policies, and actions as they are currently written* to better support youth health, safety, and mobility outcomes. Existing language is reflected as plain text and recommended amendments are highlighted in yellow.

ECONOMIC DEVELOPMENT

E-A.3 Paid and Volunteer Job Programs. The City shall expand programs that provide paid and volunteer jobs and internships for local youth and for economically, physically, and socially disadvantaged people, continuing to work with federal, State, and regional partners to seek funding opportunities for strategic workforce and economic development programs. Emphasis shall be given to career pathways and pipelines in which Biracial Indigenous Person of Color (BIPOC) identifying individuals and other

marginalized groups are systemically underrepresented, particularly urban and long-range planning.

- **Responsible Entities:** Office of Innovation and Economic Development (lead); Youth, Parks, & Community Enrichment, Department of Public Works (support)
- **Timeframe:** Ongoing

Recommended Economic Development Plans and Programs Amendments Justification:

While Civic Thread supports the City's initiatives to embed racial equity and increase diverse representation within its internal systems, *that process must start with training and empowering local youth*. The General Plan is long-term in nature and investments in future equitable hiring practices must start with building young BIPOC, women, and nonbinary/LGBTQIA+ leaders today. For the planning field in particular, BIPOC practioners are systemically underrepresented. In fact, American Community Survey data shows that **the planning profession appears to be getting *less* representative, particularly with respect to Black women.**[28] As planners are extremely influential in making decisions that impact people's everyday lives in the short- and long-term, this is deeply concerning. As the field has a growing orientation towards addressing historic harms and employing equity-based practices, diverse representation from Sacramento's own communities is essential.

General Plan Goals and Policies Supported:

- **EJ-4.4** Capacity Building.
- **EJ-5.6** Embedding Racial Equity.
- **EJ-A.3** Diverse Representation.

ENVIRONMENTAL RESOURCES AND CONSTRAINTS

- **ERC-3.1 Urban Forest Plan.** The City shall maintain and implement an Urban Forest Plan.
    - The City shall coordinate closely with incorporated school districts to ensure urban tree canopy expansion is prioritized along primary routes to school, particularly at/around Title I designated schools and school sites located in Sacramento's Disadvantaged Communities.

[28] "Black Women in Planning: Where Are We?" (The London School of Economics and Political Science, blog post, December 2020)

- **ERC-8.3 Urban Heat Pilot Projects.** The City shall continue to pursue pilot projects to test the use of new materials (e.g., landscaping, building materials, and site design techniques) in City infrastructure projects that can mitigate urban heat when implemented at scale.
    - The City shall work closely with incorporated school districts, design and architecture firms, etc. to promote the inclusion of K-12 school buildings and campuses as critical urban forms in pilot designs.

Recommended ERC Goals and Policy Amendments Justification:

As we encourage students to walk, bike, and roll to school, the City must ensure routes to school are well-shaded to keep students safe and healthy as extreme heat-related weather events continue to increase in frequency and severity. As children spend a great deal of their day and time in school, innovations in cooling and heat-resistant technologies and building practices must include school campuses as critical urban forms. See "Recommended ERC Goals and Policies" above for expanded justification.

General Plan Goals and Policies Supported:

- **M-1.14** Walking Facilities.

Recommendations for Council Adoption

While there are numerous, cross-cutting policies and goals included in the Public Review Draft that indirectly support Safe Routes to School, Civic Thread strongly recommends councilmembers, City staff, and the consultant team to specifically uphold the following draft policies, principles, and actions in the final Plan *as is* in support of youth health, safety, and mobility:

LAND USE AND PLACEMAKING

- **LUP-2.8** Co-Location of Community Facilities.

ENVIRONMENTAL RESOURCES AND CONSTRAINTS

- **ERC-3.2** Tree Canopy Expansion.

ENVIRONMENTAL JUSTICE

- **EJ-2.16** Discourage Unhealthy Uses.

MOBILITY

- **M-1.14** Walking Facilities.
- **M-1.15** Improve Walking Connectivity.
- **M-1.16** Barrier Removal.
- **M-1.41** Funding.
- **M-2.2** Wider Participation.

YOUTH, PARKS, RECREATION, AND OPEN SPACE

- **YPRO-1.7** Co-Located Joint-Use Facilities.
- **YPRO-2.2** Co-Location of Community-Serving Facilities.
- **YPRO-2.3** School Facilities.
- **NS-YPRO-4** New Park Site.

PLANS, PROGRAMS, STUDIES, AND REPORTS

- **EJ-A.2** Air Filtration Systems.
- **EJ-A.4** Amortization Ordinance.
- **M-A.1** Transportation Investment Priorities.
- **YPRO-A.4** Youth Internships.
- **YPRO-A.5** Violence Prevention and Youth Development.
- **YPRO-A.6** Joint-Use Standards.

Thank you for your consideration of these comments. Should you have any questions on any of the recommendations above, please do not hesitate to contact me at jgrimaldi@civicthread.org.

Sincerely,

Jordan Grimaldi

Jordan Grimaldi
Safe Routes to Schools Director

CIVIC THREAD

August 8, 2023

City of Sacramento
915 I Street
Sacramento, CA 95814

RE: Safe Routes to School Policy Recommendations for City of Sacramento's draft Climate Action and Adaptation Plan

Dear City of Sacramento councilmembers, staff, and consultant team,

My name is Jordan Grimaldi and I am the Safe Routes to Schools Director at Civic Thread, formerly "WALKSacramento." Civic Thread is a non-profit dedicated to elevating institutionally underserved voices and priorities to co-create communities, neighborhoods, and places where everyone can thrive. Civic Thread has been an active participant throughout the General Plan process as a member of the Environmental Justice Working Group.

I commend the staff and consultant team's efforts to authentically reflect communities' priorities and values from previous visioning phases into the draft Climate Action and Adaptation and General Plans. As both plans are complex documents seeking to address a suite of cross-cutting issues, I am submitting this comment to uplift Safe Routes to School as a powerful and cohesive framework that addresses many of the City's goals, including carbon reduction, public health, environmental justice, active transportation, and safety. Safe Routes to School is a national movement that aims to make it safer and easier for students to walk and bike to school through a comprehensive framework known as the "6 E's": Evaluation, Education, Encouragement, Engineering, Engagement, and Equity.[1]

Transportation is the largest contributing sector to the City's greenhouse gas emissions and school commuting plays a large role. Due to significant school district transportation budget cuts and roll-ups of crossing guard programs, the vast majority of students get to school by Single Occupancy Vehicle. That means thousands of families making twice daily car trips for over 180 days of the year. Roadway safety also plays a critical factor. According to the City's Vision Zero School Safety Study, **Sacramento had the highest**

[1] Learn more about Safe Routes to School at https://www.saferoutespartnership.org/

number of speed related traffic fatalities and the most collisions resulting in fatalities or serious injuries involving pedestrians under the age of 15 of *any city in California*.[2]

City-wide policies and programs for Safe Routes to School can maximize the numerous community-wide co-benefits it offers, including cleaner air, safer roads and sidewalks, and lower rates of chronic diseases related to physical activity and air pollution exposure. MTC's regional Safe Routes to School pilot program in the Bay Area found an "average 4.8% reduction in greenhouse gas (GHG) emissions per student for trips one mile or less from school. If all students enrolled in public schools at all nine counties received Safe Routes programming, it could **reduce as much as of 5.3 million pounds of GHG emissions from transportation due to school trips**."[3] Another study of Safe Routes to School programming across 37 large urban areas, 428 small urban areas, 1088 metropolitan counties **estimated 65.5 million people in urban areas could benefit from resulting increases physical activity and better air quality**.[4] Such benefits are especially critical in Sacramento's Environmental Justice communities where there are significant health disparities and disproportionate rates of pedestrian and cyclist injuries and fatalities.

While the draft CAAP and General Plan include a few promising elements supportive of youth mobility, health, and safety, Safe Routes to School's proven track record of improving health and safety outcomes and increasing modeshift highlights the importance of comprehensive, jurisdiction-wide programming beyond infrastructure improvements, air filtration systems, joint-use standards, and Vision Zero.[5]

To ensure Safe Routes to School remains at the forefront of City priorities, Civic Thread strongly urges the City to secure and dedicate funding to establishing a Safe Routes to School Coordinator whose primary responsibility will be developing and executing a Safe Routes to School Action Plan to create a clear roadmap for sustaining policies and

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[2] https://www.cityofsacramento.org/-/media/Corporate/Files/Public-Works/Transportation/VisionZero/VZ-School-Safety-Study-Final-Approved.pdf?la=en

[3] MTC's Climate Initiatives Program Evaluation Regional Safe Routes to School Program (FY 2009-2010 through FY 2011-2012), https://mtc.ca.gov/sites/default/files/MTC_Regional_SRTS_Evaluation_Report_Final.pdf

[4] Watson M, Dannenberg AL. "Investment in Safe Routes to School projects: public health benefits for the larger community." Preventing Chronic Disease, Volume 5, Issue 3, July 2008.

[5] Noreen McDonald, Ruth Steiner, Chanam Lee, Tori Rhoulac Smith, Xuemei Zhu and Yizhao Yang (2014). "Impact of the Safe Routes to School Program on Walking and Bicycling." Journal of the American Planning Association. Vol 80, Iss 2, p 153-167.; Orion Stewart, Anne Vernez Moudon, and Charlotte Claybrooke (2014) Multistate Evaluation of Safe Routes to School Programs. American Journal of Health Promotion: January/February 2014, Vol. 28, No. sp3, pp. S89-S96. Peter A Muennig et al., 'The Cost-Effectiveness Of New York City's Safe Routes To School Program', American Journal Of Public Health, iss 0 (2014): 1-6.

programs. More detailed comments and recommendations for explicit, robust Safe Routes to School policies will be detailed in comment submissions for the General Plan 2040 Update Public Review Draft.

Thank you for your consideration and for your support in creating a safer, healthier, more equitable Sacramento.

Sincerely,

Jordan Grimaldi

Jordan Grimaldi
Safe Routes to Schools Director

From:	Sac 2040 Gpu
To:	Climate Action & Adaptation Plan
Subject:	FW: Draft General Plan
Date:	Monday, August 21, 2023 8:24:52 PM

From: S Shagwell [redacted]
Sent: Monday, August 21, 2023 7:35 PM
To: Sac 2040 Gpu <sac2040gpu@cityofsacramento.org>
Subject: Draft General Plan

I support the importance of Sacramento's Urban Forest and our established neighborhoods – in the Climate Action and Adaptation Plan, the 2040 General Plan, and
all the accompanying documents. I ask the City Council and city staff to keep the importance of the Urban Forest and our neighborhoods at the forefront. There are virtually no provisions in GP 2040 or the CAAP to protect our existing, mature tree canopy - 80% of which is on private property, much of it in residential front and back yards slated for upzoning and increased density.

I oppose the densification of Sacramento's existing diverse single family neighborhoods.
Densification will lead to reduction of our mature tree canopy. Densification reduces open space available for trees and plants that are critical summer cooling, reducing air
pollution and promoting habitat for birds and insects. Densification also creates congestion on narrow streets not designed for high densities. It promotes urban sprawl
by reducing and eliminating the option for single family homes inside the city. Densification also does not result in affordable housing.

I support policies that will actually create more affordable housing, especially for lower income households, not false claims that affordable housing will result from more Accessory Dwelling Units (ADUs) or densification of existing single family neighborhoods. One meaningful action the city can take is to prohibit non-owner occupied housing, including ADUs, from being used as short-term rentals, which are defacto hotel rooms and reduce our housing stock.

Thank You

Charles Conner
Sacramento homeowner

From:	Michael Corley
To:	Sac 2040 Gpu
Subject:	Lack of public comment on changes to 2040 General Plan
Date:	Friday, September 15, 2023 9:30:04 AM

The current proposal of the Campaign for Natural Areas (the Campaign) requests that 1,392.83 acres of the City of Sacrameno's parks become designated as a 'Natural Area'.

1,392.83 acres is somewhere between 32.65% - 43.52% of the currently available Sacramento parks acreage.

Of those 1,392.83 acres, 816 acres are in three low-resource districts – Districts 2, 5, and 8.

816 acres is 59% of the proposed Natural Area acreage is in low-resource districts.

The City of Sacramento has an obligation to provide recreational greenspace for humans. The YPCE has already published that City Council Districts 2 and 5 already have the lowest ratio of recreational acreage and lowest ratio of athletic amenities per 1,000 people than the other 6 council districts. This City already has a serious case of park inequality that has yet to be addressed. All people living in the communities surrounding these 10 largest parks across the City should be given the opportunity to present the ways they wish to use the recreational greenspace nearest them.

If the City wishes to proceed by including a Natural Areas designation in the 2040 General Plan as outlined by the Campaign, the City should begin by the same clear and well-published public notification and public comment period that they have held for other aspects of the 2040 General Plan - since the last well-published public comment period for the 2040 General Plan just closed on August 31 (or was it August 23rd? The public got conflicting messages on that closing date as well).

I require that the following process is implemented by the City before placing any Natural Area Designations within the 2040 General Plan:

1. A city-wide public unbiased survey (and not substitute this City survey with the Valley Vision survey conducted a year ago for a different purpose);
2. Publish with at least 2 months notice a series of public workshops and informational sessions in every council district to inform and include the public in the meaning and implications of the Natural Area designation; and
3. A 60-90 public comment period on the proposed Natural Area designations ahead of any City Council vote.

If this cannot be accomplished in time to include in the 2040 General Plan, I require that every step of the above process still be conducted with the goal of being included in the 2045 General Plan update. The City has an obligation to bring any changes of public spaces this widespread to the 2040 General Plan with time for clear public review and comment before being made City policy and placed in any General Plan.

Sincerely,

Michael Corley

I'm writing as a resident of Fruitridge Manor in District 6 and a member of Strong SacTown.

The Draft for the 2040 General Plan (GP) has made significant changes to the 2035 GP, and I'm excited to see many of these recommendations. Even so, I see some significant hurdles that need to be addressed before the GP draft is completed.

The must focus on two main themes: Equity and Safety. The City must prioritize these in every development moving forward, and general funds need to be set aside to achieve these goals.

Sacramento has nearly perfect weather all year long, is flat, and has the amazing American River Trail. However, because we do not have ample trees, safe bike parking, or safe paths to bike on, many residents choose not to bike to their destinations. If Active Transportation (AT) is an earnest goal in the GP and in the Climate Action and Adaptation Plan (CAAP), the city must invest heavily in bicycle and pedestrian walkways, make slow roads complete streets, and provide ample shade by planting trees along these paths. This includes more drastic changes such as:

- Reducing street size in favor of creating cut outs to plant city trees in,
- Implementing several traffic calming street designs for safety,
- Increase separated bike lanes by use of bollards and curbs,
- Increase bike parking availability,
- Prioritize bikes, buses, and people by closing direct routes to cars (such as Stockton Blvd and Broadway), and
- Connect major destinations, such as light rail stations, to bike and walking paths.

To meet its housing needs and reduce overall reliance on cars (which allows the city to meet it's VMT goals), the City must increase the FAR across the city to at least 2.0, remove parking minimums (establish parking maximums), prohibit new drive-throughs and gas stations, and upzone/develop parking lots. Please ensure that the maps also reflect this information, as many don't even reflect the updates between the 2035 and 2040 GPs.

Sacramento is my home and I love it. I'm deeply concerned that our dependance on privately owned cars has made this city unsafe, costs millions to upkeep roadways, increases greenhouse gases and heat from the asphalt, and reduces tax revenue by dedicated so much land to moving and storing privately owned vehicles. This is all before taking into account how much it costs to own a car. All of this puts a huge burden on people who can barely afford these "essentials," and if they can't afford them at all, or have a disability where they can't drive, they are further punished by the city because we have not seriously invested in supporting SacRT for decades.

The CAAP firmly establishes that AT and transit are a higher priority than electric vehicles (ZEVs), but the goals set out in each section don't reflect this. The goals around ZEVs are specific, measurable, ambitious, and actionable, such as TR-3.1, 3.3, 3.6, 3.7, and 3.8. The CAAP recognizes that these changes would make significant improvements to everyone's health and reduces our carbon emissions. However, the goals for creating our robust AT and Transit infrastructure are vague (TR-1.3, 1.4, 1.5) or out of date (TR-1.1, 1.2), implementing the old bicycle (2016) and pedestrian (2006) master plans, conducting yet another study, and identifying/securing funding for future AT projects. These are all the first steps in creating AT, but they have been stalled because concrete goals and ways to measure success have not been established. For transit infrastructure, the language is even more vague because the city does not

have control over SacRT. Even though the city does not run SacRT, they must have actionable goals that provide significant support to SacRT, such as implementing items like strategic road closures (see above).

I understand the initial investment AT and improving transit will be steep and funding is hard to come by. But the initial investment in our 3,117 lane miles of streets for cars in the city was also steep, and the continued maintenance on these streets will keep growing in cost, cornering the city to spend taxpayer dollars on maintenance we can't afford.

The GP and CAAP need to specify specific funds that will go to projects that reduce reliance on cars, and we need to start anywhere to shift how people move around the city. Let's start with closing streets like we did during the pandemic, and let people have the streets so we can shop, eat, and live safely.

ECOS
ENVIRONMENTAL
• COUNCIL •
OF SACRAMENTO
Post Office Box 1526 | Sacramento, CA 95812-1526

August 23, 2023

Mayor Steinberg and Sacramento City Councilmembers
Sacramento City Hall
951 I Street, Sacramento CA, 95814

Sent via email

RE: **City of Sacramento Draft Climate Action & Adaptation Plan, April 28, 2023, referred to as "CAAP"**

Dear Mayor and City Councilmembers,

Thank you for the opportunity to comment on the Draft CAAP. Our main comments are as follows:

- The Plan should be upfront about its financial cost and clearly prioritize City actions according to cost-effectiveness in terms of emissions reductions per dollar.
- The Plan should address funding for underground infrastructure needed for infill development.
- The Plan should commit to preserving the Sacramento County Urban Services Boundary, which was put into place in 1993 to prevent greenfield development.

Please consider our complete comments in the following pages. We looked forward to engaging with you as the CAAP advances, in order to help make this plan the best as it can be for the present and future residents of the City of Sacramento.

Sincerely,

Susan Herre AIA AICP
President of the ECOS Board of Directors

cc:
Mayor Steinberg, DSteinberg@cityofsacramento.org
Lisa Kaplan, District 1, District1@cityofsacramento.org
Sean Loloee, District 2, Sloloee@cityofsacramento.org
Karina Talamantes, District 3, District3@cityofsacramento.org
Katie Valenzuela, District 4, kvalenzuela@cityofsacramento.org
Caity Maple, District 5, District5@cityofsacramento.org
Eric Guerra, District 6, eguerra@cityofsacramento.org
Rick Jennings II, District 7, rjennings@cityofsacramento.org
Mai Vang, District 8, district8@cityofsacramento.org
Vic Randall, Sr. Planner, LRP, VRandall@cityofsacramento.org
Jennifer Venema, Climate Action Lead, JVenema@cityofsacramento.org
Mindy Cuppy, City Clerk, mcuppy@cityofsacramento.org

1) Funding and Prioritization of CAAP actions

The Plan should set forth proposed funding sources for the CAAP's estimated $3.2 billion cost. The sources and a plan to acquire them should be in the Plan.

The Plan should prioritize the CAAP's actions, and correlate with near-, mid-, and long-term funding sources. Presently, Appendix D identifies four "priority City-led CAAP measures". This is a good start in addition to the Implementation Table, but all actions within the CAAP should be clearly ranked in terms of priority and cost-effectiveness.

2) Infill development and "backbone infrastructure"

The Plan sets commendable targets for infill development, but it relies solely on policies, land use designations, and implementation programs to reach these targets. Meanwhile, the Plan largely ignores the inadequate capacity of underground infrastructure (storm, sewer, water) which causes higher density infill development to remain financially infeasible for many developers.

The Plan should address the need to accelerate this work to increase capacity in "backbone infrastructure" to enable infill development along existing commercial corridors served by transit. The Plan should prioritize this work for funding through a future taxing ballot measure or federal/state funding through SACOG's Green Means Go initiative. The Plan should acknowledge a partnership with SACOG as a means of furthering infill development.

3) Performance Indicators

Overall, we identified many places in the Plan where performance indicators need to be improved. For example, many actions list performance indicators such as "VMT reduced" (TR-2.3), "EV chargers installed" (TR-3.2), "ZEV registration increase" (TR-3.8), or "[decrease in] per capita water use" (WW-1.7). Many of these indicators are expected to move in the desired direction irrespective of City action, due to broader state and national trends. Therefore, to effectively monitor the efficacy of the CAAP, all actions in the CAAP require specific, quantifiable, and measurable targets that account for baseline trends.

Furthermore, quantitative performance indicators are necessary for CAAP measures. For example, CS-1.1, the Urban Forest Plan, speaks to "prioritize tree planting in areas with the lowest average tree canopy cover and explore strategies to reduce barriers to tree planting in disadvantaged areas and improve tree health". The performance indicator of CS-1.1, however, does not numerically specify the proportion of trees which will be sited in low-income or disadvantaged areas.

4) Emissions from Land Conversion & Protection of Biodiversity

Emissions from Land Conversion:
The City does not account for carbon emissions from conversion of natural land to developed land in its emissions inventory. The Plan does, however, include carbon sequestration from its Urban Forest Plan, CS-1.1, in its emissions inventory. The California Supplement to the United States Community-Wide Greenhouse Gas Emissions Protocol states that "carbon stocks and sequestration should be included in California inventories when changes in land use are substantial, in particular where urban development or agricultural expansion encroaches on woodlands, forest, and *wetlands*" (emphasis added). The City should not count sequestration, as with the Urban Forest Plan, if it ignores loss of sequestration through land conversion as, for example, with the greenfield development/wetland habitat in the Natomas Basin.

Protection of Bio-diversity:
It is very disappointing to see the City helping to lead an environmental study of the annexation of greenfield and farmland and subsequent conversion to 24/7 warehouses as part of the Airport South Industrial Proposal. The land for the proposed project is zoned for agriculture, needed as habitat or ag land to support wildlife per the Natomas Basin Habitat Conservation Plan, and lies outside the Sacramento County Urban Services Boundary (USB).

The USB was established in 1993 as "a permanent boundary" to prevent greenfield development. If the City and County proceed with City annexation, the land should remain in agriculture or be conserved as habitat, and the USB boundary line remain unchanged.

The following excerpts from the Sacramento County General Plan Land Use Element, amended Oct 2020, explain the environmental purpose of the USB:

> "The Urban Policy Area (UPA) and Urban Services Boundary (USB) are the backbone of Sacramento County's urban planning philosophy. *These growth boundaries are intended to protect the County's natural resources from urban encroachment, as well as to limit costly sprawling development patterns. While the USB is intended to be a permanent boundary,* the UPA is adjusted incrementally as needed to ensure that the County can accommodate anticipated growth over the next 25-year planning cycle. The area between the two lines is reserved for future urbanization." [pg. 19]
>
> "Objective: Reserve the land supply to amounts that can be systematically provided with urban services and confines *the ultimate urban area within limits established by natural resources.* Intent: The Urban Service Boundary (USB) . . .indicates the ultimate boundary of the urban area in the unincorporated County. This boundary is based upon jurisdictional, *natural and environmental constraints to urban growth*." [pg.20]

As a signatory to the Natomas Basin Habitat Conservation Plan, which was based on the scientific expertise of federal and state wildlife agencies, the City has a responsibility to ensure the Plan's success. This means adhering to the limit of 17,500 acres of permitted development as stipulated in the Plan. To this end, the CAAP should commit the City to opposing, for reasons related to negative impacts to climate, flooding, habitat, biodiversity, and VMT, development on existing agriculture land in the Natomas Basin on land outside the permitted areas.

5) Water Conservation

The Plan should place greater emphasis on water conservation, particularly through native revegetation, replacement of ornamental and high-water-use landscaping, and installation of low-water-use landscaping.

The Plan should commit to identifying and phasing out nonessential turf citywide.

The Plan should set clear targets and a timeline for the use of nonpotable reclaimed water for landscape irrigation.

The Plan should make more ambitious use of stormwater recharge projects.

6) City Partnerships

Actions wherein the City "supports", "promotes", or "encourages" a program led by another agency, such as SMUD or SacRT, should justify their inclusion in the City CAAP. Such actions should clearly describe the City's role in the partnership, including what additional value the City's involvement will bring to the program which would otherwise be absent.

7) Education and Outreach

Actions regarding education and outreach should be directly linked to the success of the measure. Performance indicators for these CAAP actions should not consist only of developing fliers and educational materials, as many currently do, but should instead commit to reaching a targeted number of Sacramento residents and measurably affecting the broader performance indicator of the associated measure.

In addition, we believe that education and outreach efforts should be focused in particular on reaching lower income and minority communities. As part of this effort, we advise that educational materials and fliers should be made available in multiple languages to reflect the diversity of languages spoken in the city.

8) Phase 3?

We note that action W-1.1, for achieving 75% organic waste diversion, is slated for Phase 3. The Plan does not define Phase 3. We believe that organics recycling can be pulled forward to Phase 1, especially since organics collection has already rolled out in the city.

From:	Joshua Everett
To:	Climate Action & Adaptation Plan; Raymond Rodriguez; Sac 2040 Gpu
Subject:	Sacramento 2040 General Plan
Date:	Wednesday, September 13, 2023 7:18:42 AM

Good Morning,

The current proposal of the Campaign for Natural Areas (the Campaign) requests that 1,392.83 acres of the City of Sacrameno's parks become designated as a 'Natural Area'.

1,392.83 acres is somewhere between 32.65% - 43.52% of the currently available Sacramento parks acreage.

Of those 1,392.83 acres, 816 acres are in three low-resource districts – Districts 2, 5, and 8.

816 acres is 59% of the proposed Natural Area acreage is in low-resource districts.

The City of Sacramento has an obligation to provide recreational greenspace for humans. The YPCE has already published that City Council Districts 2 and 5 already have the lowest ratio of recreational acreage and lowest ratio of athletic amenities per 1,000 people than the other 6 council districts. This City already has a serious case of park inequality that has yet to be addressed. All people living in the communities surrounding these 10 largest parks across the City should be given the opportunity to present the ways they wish to use the recreational greenspace nearest them.

If the City wishes to proceed by including a Natural Areas designation in the 2040 General Plan as outlined by the Campaign, the City should begin by the same clear and well-published public notification and public comment period that they have held for other aspects of the 2040 General Plan - since the last well-published public comment period for the 2040 General Plan just closed on August 31 (or was it August 23rd? The public got conflicting messages on that closing date as well).

I require that the following process is implemented by the City before placing any Natural Area Designations within the 2040 General Plan:

1. a city-wide public unbiased survey (and not substitute this City survey with the Valley Vision survey conducted a year ago for a different purpose);
2. publish with at least 2 months notice a series of public workshops and informational sessions in every council district to inform and include the public in the meaning and implications of the Natural Area designation; and
3. a 60-90 public comment period on the proposed Natural Area designations ahead of any City Council vote.

If this cannot be accomplished in time to include in the 2040 General Plan, I require that every step of the above process still be conducted with the goal of being included in the 2045 General Plan update. The City has an obligation to bring any changes of public spaces this widespread to the 2040 General Plan with time for clear public review and comment before being made City policy and placed in any General Plan.

From: Sac 2040 Gpu
To: Climate Action & Adaptation Plan
Subject: FW: Comments re the Final Draft Climate Action & Adaptation Plan
Date: Thursday, August 24, 2023 8:03:29 AM

From: Laurie Rivlin Heller [redacted]
Sent: Wednesday, August 23, 2023 4:38 PM
To: Engage <Engage@cityofsacramento.org>; District 1 <district1@cityofsacramento.org>; District 3 <district3@cityofsacramento.org>; Katie Valenzuela (City) <kvalenzuela@cityofsacramento.org>; District 5 <district5@cityofsacramento.org>; Eric Guerra <EGuerra@cityofsacramento.org>; Rick Jennings <RJennings@cityofsacramento.org>; District 8 <District8@cityofsacramento.org>
Cc: Sac 2040 Gpu <sac2040gpu@cityofsacramento.org>
Subject: Comments re the Final Draft Climate Action & Adaptation Plan

Honorable Mayor and City Council:

I appreciate the opportunity to comment on the City's Final Draft Climate Action and Adaptation plan. I also appreciate all the thought and energy the staff has put into the project.

But the CAAP remains short of the final step: An 'Implementation Plan.' It needs the how, when, by whom, at what cost, and with what resources. It is past time for the City to address this deficiency – identified in numerous public comments on prior drafts - in a serious way.

The plan is short in another way. Cities throughout the State are years ahead of Sacramento in planning and implementing climate actions. With completed CAPs – and in partnership with other regional entities – they have secured funds and broken ground on hundreds of projects. A few examples include complete streets (San Francisco); extended rail systems (Los Angeles); affordable infill housing (San Diego); interconnected bikeways (Alameda County); improved waterways (El Dorado County); revitalized parks (Yuba City); and trees, trees, trees (Berkeley).

In 2023 alone ONE State program (Urban Greening) distributed $47 Million to 17 Counties – absent Sacramento. Dozens of other funding sources such as these exist.

Are Council members aware of these programs? Have you visited successful projects throughout the State? Have you consulted with your peers in these communities? Do you regularly speak with State and Federal representatives who know which funding streams could benefit Sacramento?

Have you met with the people in your district to let them know what grants are available to them through the *'Inflation Reduction Act'*?

In a Climate Emergency, it is not enough to direct staff to 'draft a budget.' Council members must do the legwork to support Climate Action. We need *you* to know what is successful, available, and feasible – personally.

Many of us are afraid a great deal of Federal dollars will be left on the table in the coming decade. To be competitive for climate-mitigation grants from the

‘*Infrastructure Investment and Jobs Act*,’ Sacramento will need to have its ducks in a row. That means real partnerships, secured matching funds, detailed budgets, and timelines for specific, high priority projects.

Sacramento should be among the California communities that secure available grants for public transit, affordable housing, renewable energy, active transportation, open space, conservation – and a multitude of other infrastructure projects – that will move us toward sustainability.

We need every Council Member to be hands-on to address this existential issue.

Sincerely,

Laurie Heller

From: Sac 2040 Gpu
To: Climate Action & Adaptation Plan
Subject: FW: Protect tree canopy and housing issues
Date: Monday, August 21, 2023 6:31:57 PM

From: Ilsa Louise Hess [redacted]
Sent: Monday, August 21, 2023 5:54 PM
To: Sac 2040 Gpu <sac2040gpu@cityofsacramento.org>
Subject: Protect tree canopy and housing issues

Hello,

I oppose the densification of Sacramento's existing diverse single family neighborhoods. Densification will lead to reduction of our mature tree canopy. Densification reduces open space available for trees and plants that are critical summer cooling, reducing air pollution and promoting habitat for birds and insects. Densification also creates congestion on narrow streets not designed for high densities. It promotes urban sprawl by reducing and eliminating the option for single family homes inside the city. Densification also does not result in affordable housing.

I support policies that will actually create more affordable housing, especially for lower income households, not false claims that affordable housing will result from more Accessory Dwelling Units (ADUs) or densification of existing single family neighborhoods. One meaningful action the city can take is to prohibit non-owner occupied housing, including ADUs, from being used as short-term rentals, which are defacto hotel rooms and reduce our housing stock.

I support the importance of Sacramento's Urban Forest and our established neighborhoods – in the Climate Action and Adaptation Plan, the 2040 General Plan, and all the accompanying documents. I ask the City Council and city staff to keep the importance of the Urban Forest and our neighborhoods at the forefront. There are virtually no provisions in GP 2040 or the CAAP to protect our existing, mature tree canopy - 80% of which is on private property, much of it in residential front and back yards slated for upzoning and increased density.

Thank you,
Ilsa

Letter 9

September 27, 2023

Amy Yang
Associate Planner
City of Sacramento
Sent via email to asyang@cityofsacramento.org

RE: Public Review Draft of the Climate Action & Adaptation Plan

Dear Amy Yang,

Thank you for allowing House Sacramento the opportunity to comment on the Public Review Draft of the Sacramento Climate Action & Adaptation Plan (CAAP).

House Sacramento is an organization formed to advocate for building inclusively affordable communities in the Sacramento area. We formed to represent renters, young people, and other communities disproportionately harmed by the affordable housing crisis. 9-1

In general, we are disappointed in the City's measures that seem to be (at best) treating this as a perfunctory process under State law. The CAAP fails to adequately propose sufficient measures to reduce Greenhouse Gas Emissions (GHGs), and it certainly doesn't align with our vision of a City that is a national leader in sustainability.

The highest level issue is that **the measures included in the CAAP are insufficient to meet carbon neutrality by 2045**, which is state law. We need to be more ambitious. The proposed measures for several sectors seem insufficient compared to the magnitude of Greenhouse Gas (GHG) reductions needed, especially passenger vehicles. Aside from the GHG reduction benefits, the health benefits of cleaner air alone typically justify the costs of GHG mitigation. 9-2

The introduction section is a bit odd, and frankly lazy, in that it relies on data and projections from 2005 for extreme heat days and temperature (including Figures 1-3 and 1-4). This is a missed opportunity to highlight the extreme heat that has been increasing in our region since then. We should be using more current information on these charts, since this information is readily available from sources such as the National Weather Service.

To further underscore the need for more ambition to reach carbon neutrality, the City's GHG inventory is clearly an underestimate. As noted in section 1.4, several emissions categories are omitted from the totals, including ones that are covered by the State's official inventory (including agricultural operations, off-road vehicles, and high-global warming potential (GWP) gasses). It also seems to be excluding methane leaks from gas distribution and any emissions 9-3

from large industrial fossil fuel use. These are all unnecessary omissions and they should be rectified by utilizing the following sources of information:

1. EPA's FLIGHT tool shows 4 active large industrial facilities within the City limits: two gas electricity generation plants, one industrial hydrogen producer, and UC Davis Medical Center. Their emissions should not be excluded from the planning process.
2. An approximation of fugitive methane from gas distribution attributable to Sacramento could be calculated by multiplying PG&E's reported fugitive methane by the population ratio of Sacramento vs its full service territory. Including this category would substantially increase the GHG impact of residential/commercial natural gas use.

9-3 cont'

The CAAP appropriately recognizes state policies that will reduce the city's GHG emissions regardless without additional action, such as the Renewables Portfolio Standard (60% renewables by 2030, 100% zero-carbon electricity by 2045), Advanced Clean Cars (100% zero-emission vehicle sales for new cars by 2035), Title 24 Green Building Standards, and SB 1383 organic waste diversion and methane reduction targets. However, the City can't just rely on the State to meet these goals; there's a lot more the City can do to support these transitions. There's also a potential nexus with housing in these specific areas, such as streamlined approvals/fee reductions/tax incentives for housing projects that are all-electric and include on-site solar PV, energy storage, and EV chargers. Similar incentives could also apply to commercial buildings, which have just as large of a carbon footprint in the City as residential uses. The recent court intervention over the City of Berkeley's gas ban ordinance is certainly a setback, but carbon neutrality will not be reached without phasing out methane combustion in homes and businesses. For example, many older homes need an electric panel upgrade and other forms of remediation before electrification is viable. We believe there are opportunities for the City to make this easier.

9-4

Achieving carbon neutrality for municipal and public operations is low-hanging fruit. We recommend the following measures:

- City fleets and buildings should be fully electric to the extent possible, and the City could procure renewable natural gas to bridge the short-term gap for some larger-scale building needs.
- The city should be installing solar PV, energy storage, and EV chargers at public buildings wherever feasible.
- Install LED streetlights and pursue other energy efficiency in City-owned facilities. LED streetlights and other efficiency measures pay for themselves.
- Partner with Sacramento Regional Transit (RT) and school districts to electrify buses.
- Partner with SMUD to procure renewable electricity beyond state minimum requirements.
- Ensure city employees have a zero-carbon commute.
- The University of California has detailed plans for 100% zero-carbon electricity across all campuses by 2025 and full carbon neutrality by 2045; they also have an expanding

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footprint within the City of Sacramento and the City should follow UC's example for its own operations. 9-11 cont'

- The City's GHG inventory leaves out embodied carbon/lifecycle emissions (which is technically a valid accounting), but it could still pursue action on this front. The City should consider leveraging its purchasing power to procure low-carbon cement/steel/building materials, and could further incentivize low-carbon construction, such as mass-timber 9-12

We encourage caution about expanding development impact fees to pay for CAAP measures, as indicated on page 20. This has the potential to disincentivize infill development. However, we support restructuring impact fees to support more climate-friendly development proposals, as outlined above. The City should also consider additional funding sources to pay for these measures. 9-13

Most concerningly, the CAAP is not serious enough about VMT reductions. It is dismissive in tone by discussing past failed attempts to get Americans out of cars. VMT reduction policies have been successful in cities worldwide and they will work here. While the CAAP recognizes the need to improve the experience of walking and biking in Sacramento, that's not enough to unwind car addiction. The City needs to apply additional pressures on reducing automobile dependency - the proposed CAAP measures are not sufficient. We support some of the measures mentioned including abolishing parking minimums/instituting parking maximums, taking back traffic lanes for rapid bus service or new bike lanes, and a proposed new uber/lyft tax. <u>But we need to go further</u>. Expand mix-used zoning so that critical amenities are closer to home for everyone. Bring back slow-streets and consider additional car-free zones downtown. Build more dedicated bike paths and secure bike parking. Raise parking fees and implement more enforcement of parking violations. We should also install speed cameras and implement congestion pricing, or at least pursue and advocate for legislation to allow the City to implement these measures where not currently allowed under state legislation. 9-14

People rationally respond to economic realities. The biggest driver of GHG emissions is the car. **We need to make driving more expensive and less convenient.** There is no alternative. Carbon neutrality is not realistic without making some hard choices, and it's disingenuous to pretend that this tradeoff isn't real. We urge staff to consider a more ambitious CAAP prior to adoption. We have a climate crisis - let's put forward a CAAP that reflects that urgency. 9-15

Regards,

Kevin Dumler

Kevin Dumler
Director of House Sacramento
kwdumler@gmail.com
www.housesac.org

From: Karen Jacques
To: Sac 2040 Gpu
Cc: Katie Valenzuela (City)
Subject: Comments on Draft CAAP
Date: Wednesday, August 23, 2023 9:16:16 AM

The following are my comments on various sections of the CAAP. I appreciate the immense amount of work that staff did to put this document together.

Buildings:

I am a member of the 350 Electrification Committee and am in agreement with all the comments included in the Committee's letter I have some additional comments on items E3 Existing Building Retrofit and E5 which deals with density increases in residential neighborhoods.

E3 I strongly support the need to retrofit existing buildings to make them all electric. I have been through the process and, the sooner the City can begin to educate residents that retrofit is coming the better. Many buildings will require new wiring and/or a new electrical panel and transitioning to electric is much easier if these things are brought up to date before an HVAC system or water heater wears out and has to be replaced. It is a good idea for landlords to do this so that their tenants won't be inconvenienced by having to go without heating or hot water for an extra day or two while their electrical service is being updated. When people come in to get permits for rehabs, it would be helpful to let them know that electrification is coming since it will be more cost effective for them to do any needed electrical upgrades in conjunction with the rehab they are doing. Once the Retrofit Ordinance is adopted and in effect, it would be helpful for the City to bring on additional staff so that people can get through the permitting process as quickly and easily as possible. If would also be helpful for the City to incentivize getting a permit by keeping the cost as low as possible.

E5 deals with the increase in density in single family (R1) residential zones that is called for in the 2040 General Plan. E5 is designed to avoid sprawl, provide a variety of housing types that will, hopefully, be more affordable than much of Sacramento's current housing stock and help meet the CAAP goal of reducing vehicle miles traveled. These goals need to be met. The 2040 General Plan and the CAAP also have the goal of significantly increasing the urban forest - a goal that must also be met to address urban heat island effect and provide Sacramento with all the other benefits (cleaner air, water absorption during floods, carbon absorption, energy savings, the muting of ambient noise, wildlife habitat, beauty) that trees provide. The problem is that without some modification, the density goal is in direct conflict with the urban forest goal. That's because ,according to a 2018 study by Davey Tree, 80% of Sacramento's urban forest is on private property, mostly in the back and front yards of R1 zoned properties, and in some other residential zones (e.g. R3A) that are slated for increased density. Sacramento needs the increased density, but it also needs to preserve the trees, including trees that have been labeled 'trees of significance' or 'private protected trees' because of their size, species or other significant characteristics. Even if Sacramento plants thousands of new trees, including trees in neighborhoods and other places that currently don't have them (and badly need them) it won't increase its its urban canopy unless it also finds ways to preserve most of its existing trees that are on private property. Since approval for new housing units is either ministerial or discretionary at staff level, this means adopting a set of objective standards to protect trees that a project must meet in order to be approved. These could include maximum foot print size of a new unit or units, which would in turn depend on the size of the lot (square footage could be

doubled by building a second story), requiring a plot plan that leaves room for an existing back yard tree or trees or, if there are no trees, leaves vacant a specified minimum amount of land with the requirement that a tree or trees be planted. Design guidelines that call for step backs or set backs to accommodate a tree would also help. Some private trees may be in front yards and maintaining existing front yard set back could be a way to preserve an existing tree or allow for a new one. Adding onto to an existing building or subdividing if it is large could be a way to create more housing units while preserving trees. Designing projects to preserve trees or allow for new trees may result in somewhat smaller buildings or units than what could otherwise be built, but the City needs affordable housing and smaller units are generally more affordable. The city should not be losing trees in order to make space for sill more large, fancy market rate units.

From a sustainability point of view it, it is far better to maintain and adaptively reuse existing buildings than to tear them down. Adding to an existing building could create a new unit as could subdividing an existing home that is large.

Clear guidelines need to be in place to avoid displacement of existing residents.

There need to be a bn on assembling adjacent parcels to build a large, new project. Such projects would significantly disrupt neighborhoods, make it harder to save trees and likely not result in the small, affordable housing units that the City hopes to see built.

As with all new or major remodel projects, exterior patios, walkways, plazas and other exterior hardscape, should be made from permeable materials so that water from the heavy rains that are predicted can be absorbed. Maximum permeability should be a consideration in installing new and replacing old, exterior 'hardscape' everywhere in the City..

Transportation

TR1.1 calls for improving active transit infrastructure.. Street trees should be considered part of the active transportation infrastructure and be planted along all city streets that don't have them. Due to increasing urban heat island their shade is necessary for safe, healthy walking, biking and rolling. The new Urban Forest Master Plan should call for street trees along all Sacramento streets that don't have them, starting with areas where urban heat island effect is worst.

TR1.2 and TR1.3 Happy to see focus on pedestrian safety. I live in the Central City and, while Traffic Calming has improved many of our streets, there are still problems.
Drivers continue to treat three lane one way streets like freeway and these streets badly need to be narrowed to two lane, preferably with buffered bike lanes. W and X streets are the most dangerous three lane, one way streets in the Central City. Drivers go at huge speeds and run the lights. It would be very nice to be able to walk from Central City neighborhoods to the Broadway Corridor, but it has become much too dangerous. These streets need traffic calming measures

TR2.6 EV car share provides an important alternative to car ownership. Glad to see it included. Hope there will be car share options in every neighborhood.

Carbon Sequestration

Tree canopy goal of 35% by 2045 is too low. In its 2018 study of Sacramento's Urban Forest Davey Tree saw a 45% tree canopy as feasible for Sacramento. Given the huge benefits that trees provide and the increasing risk of illness and death due to heat, that is the goal Sacramento should adopt and that is should be doable as long as the issues described in E5. Sacramento's tree canopy was 19.1% in 2018 according to Davey. It is urgent that the City prioritize producing a draft of the Urban Forest Master Plan. The Community was promised a draft plan within the first year after adopting the Mayors' Climate Commission goals and we still don't have one.

Climate Adaption and Heat,

This section is yet another affirmation of the need to preserve existing trees and plant new ones. It calls for urban forest protection (A 2.5); minimum tree planting requirements in new developments and "significant" remodels, and site plan review to determine where to locate trees for maximum energy conservation (A-2.6); the need for a Parking Lot Shade Tree Ordinance (A-2.7) which is long overdue ; and increased tree planting in parks (A-2.14) All of these things are badly needed.

Floods

This section is yet another reminder of the need to create as much permeability as possible. A-3.2 received a wonderful comment from a 350 Sacramento volunteer about the need to make as many surfaces as possible permeable so as to absorb water and to create rain gardens, roof top gardens that absorbs rain and on and on. I've heard this referred to as creating 'sponge cities" to prepare for increased rain. This is what Sacramento needs

Increase Community Resilience to Prepare for Climate Impacts

This is where I want to put in a plug for every neighborhood having some place where people have access to energy independent of the grid during power failures. We all need a place where we can recharge phones, computers, EVs, medical devices, whatever needs recharging and can store things like medication that need refrigeration.

From: Klynton Kammerer
To: Climate Action & Adaptation Plan
Subject: 2040 plan
Date: Wednesday, September 13, 2023 1:36:06 PM

Dear City of Sacramento,

The current proposal of the Campaign for Natural Areas (the Campaign) requests that 1,392.83 acres of the City of Sacrameno's parks become designated as a 'Natural Area'.

1,392.83 acres is somewhere between 32.65% - 43.52% of the currently available Sacramento parks acreage.

Of those 1,392.83 acres, 816 acres are in three low-resource districts – Districts 2, 5, and 8.

816 acres is 59% of the proposed Natural Area acreage is in low-resource districts.

The City of Sacramento has an obligation to provide recreational greenspace for humans. The YPCE has already published that City Council Districts 2 and 5 already have the lowest ratio of recreational acreage and lowest ratio of athletic amenities per 1,000 people than the other 6 council districts. This City already has a serious case of park inequality that has yet to be addressed. All people living in the communities surrounding these 10 largest parks across the City should be given the opportunity to present the ways they wish to use the recreational greenspace nearest them.

If the City wishes to proceed by including a Natural Areas designation in the 2040 General Plan as outlined by the Campaign, the City should begin by the same clear and well-published public notification and public comment period that they have held for other aspects of the 2040 General Plan - since the last well-published public comment period for the 2040 General Plan just closed on August 31 (or was it August 23rd? The public got conflicting messages on that closing date as well).

I require that the following process is implemented by the City before placing any Natural Area Designations within the 2040 General Plan:

1. a city-wide public unbiased survey (and not substitute this City survey with the Valley Vision survey conducted a year ago for a different purpose);

2. publish with at least 2 months notice a series of public workshops and informational sessions in every council district to inform and include the public in the meaning and implications of the Natural Area designation; and

3. a 60-90 public comment period on the proposed Natural Area designations ahead of any City Council vote.

If this cannot be accomplished in time to include in the 2040 General Plan, I require that every step of the above process still be conducted with the goal of being included in the 2045 General Plan update. The City has an obligation to bring any changes of public spaces this widespread to the 2040 General Plan with time for clear public review and comment before being made City policy and placed in any General Plan.

Sincerely,
Klynton Kammerer

From: Sac 2040 Gpu
To: Climate Action & Adaptation Plan
Subject: FW: Sacramento General Plan Comments
Date: Monday, August 21, 2023 11:27:19 AM

-----Original Message-----
From: J. Patrick Kelly <pkelly5555@gmail.com>
Sent: Monday, August 21, 2023 9:46 AM
To: Sac 2040 Gpu <sac2040gpu@cityofsacramento.org>; Eric Guerra <EGuerra@cityofsacramento.org>
Subject: Sacramento General Plan Comments

Council member Guerra and City of Sacramento

Because of recent spine surgery I am unable to review online the entire Sacramento General Plan. Below are my beliefs and would like them noted in the process of determining Sacramento's General Plan.

Densification of existing single family neighborhoods.
I oppose the densification of Sacramento's existing diverse single family neighborhoods.
Densification will lead to reduction of our mature tree canopy. Densification reduces open space available for trees and plants that are critical summer cooling, reducing air pollution and promoting habitat for birds and insects.
Densification also creates congestion on narrow streets not designed for high densities. It promotes urban sprawl by reducing and eliminating the option for single family homes inside the city.
Densification also does not result in affordable housin

Affordable Housing. I support policies that will actually create more affordable housing, especially for lower income households, not false claims that affordable housing will result from more Accessory Dwelling Units (ADUs) or densification of existing single family neighborhoods. One meaningful action the city can take is to prohibit non-owner occupied housing, including ADUs, from being used as short-term rentals, which are defacto hotel rooms and reduce our housing stock.

Urban Forest and Our Neighborhoods
I support the importance of Sacramento's Urban Forest and our established neighborhoods – in the Climate Action and Adaptation Plan, the 2040 General Plan, and all the accompanying documents. I ask the City Council and city staff to keep the importance of the Urban Forest and our neighborhoods at the forefront. There are virtually no provisions in GP 2040 or the CAAP to protect our existing, mature tree canopy - 80% of which is on private property, much of it in residential front and back yards slated for upzoning and increased density.

Thank you for your time in reviewing my comments.

Rev. J. Patrick Kelly
[redacted]

From: m k
To: Climate Action & Adaptation Plan
Subject: Natural areas opposition
Date: Saturday, September 16, 2023 6:18:18 PM

The current proposal of the Campaign for Natural Areas (the Campaign) requests that 1,392.83 acres of the City of Sacrameno's parks become designated as a 'Natural Area'.

1,392.83 acres is somewhere between 32.65% - 43.52% of the currently available Sacramento parks acreage.

Of those 1,392.83 acres, 816 acres are in three low-resource districts – Districts 2, 5, and 8.

816 acres is 59% of the proposed Natural Area acreage is in low-resource districts.

The City of Sacramento has an obligation to provide recreational greenspace for humans. The YPCE has already published that City Council Districts 2 and 5 already have the lowest ratio of recreational acreage and lowest ratio of athletic amenities per 1,000 people than the other 6 council districts. This City already has a serious case of park inequality that has yet to be addressed. All people living in the communities surrounding these 10 largest parks across the City should be given the opportunity to present the ways they wish to use the recreational greenspace nearest them.

If the City wishes to proceed by including a Natural Areas designation in the 2040 General Plan as outlined by the Campaign, the City should begin by the same clear and well-published public notification and public comment period that they have held for other aspects of the 2040 General Plan - since the last well-published public comment period for the 2040 General Plan just closed on August 31 (or was it August 23rd? The public got conflicting messages on that closing date as well).

I require that the following process is implemented by the City before placing any Natural Area Designations within the 2040 General Plan:

1. a city-wide public unbiased survey (and not substitute this City survey with the Valley Vision survey conducted a year ago for a different purpose);

2. publish with at least 2 months notice a series of public workshops and informational sessions in every council district to inform and include the public in the meaning and implications of the Natural Area designation; and

3. a 60-90 public comment period on the proposed Natural Area designations ahead of any City Council vote.

If this cannot be accomplished in time to include in the 2040 General Plan, I require that every step of the above process still be conducted with the goal of being included in the 2045 General Plan update. The City has an obligation to bring any changes of public spaces this widespread to the 2040 General Plan with time for clear public review and comment before being made City policy and placed in any General Plan.

Matthew King
Chorley Park Community Association 9168219081

Amy Yang

From: David Morrow [redacted]
Sent: Monday, May 22, 2023 9:28 AM
To: Sac 2040 Gpu
Subject: General Plan update

Hello,

I have a suggestion for the GP update and Climate Action Plan. Given that electric bicycles have become affordable and reliable, they are the low hanging fruit for zero emission transportation.

The main reason more folks don't ride bicycles for transportation (vs recreation) is the lack of safe streets. Cities worldwide have found that when the streets are safe for cycling, many people will shift from cars to bicycles. New York and Washington DC are prime examples. What Sacramento needs is a connected network of protected bike lanes. These can be shared with transit vehicles as appropriate. In this vein, more bike/pedestrian bridges and safe crossing points for major streets are appropriate as well.

Remember, 60% of all trips are five miles or less. Many of these trips could be made by electric (or conventional) bike if there is a safe place to ride.

thank you,

Dave Morrow
[redacted]

Lord, grant me chastity and temperance, but not yet.
St. Augustine of Hippo

From: Sac 2040 Gpu
To: Climate Action & Adaptation Plan
Subject: FW: Our Urban Forest
Date: Monday, August 21, 2023 11:28:01 AM

From: Christie Munson [redacted]
Sent: Monday, August 21, 2023 9:05 AM
To: Sac 2040 Gpu <sac2040gpu@cityofsacramento.org>
Subject: Our Urban Forest

Please keep in mind the importance of Sacramento's Urban Forest and our established neighborhoods – in the Climate Action and Adaptation Plan, the 2040 Genecapral Plan, and all the accompanying documents. Include strong provisions in the GP 2040 or the CAAP to protect our existing, mature tree canopy - 80% of which is on private property, much of it in residential front and back yards slated for upzoning and increased density.

Thank you,

Christie Munson
[redacted]

NORTH STATE
BUILDING INDUSTRY
ASSOCIATION

July 5, 2023

Mr. Matt Hertel
Principal Planner, City of Sacramento
300 Richards Boulevard, 3rd Floor
Sacramento, CA 96711

Subject: Legality of Electrification Language in Proposed CAAP Update

Dear Mr. Hertel

On behalf of the North State Building Industry Association (BIA) and its more than 500 members in the home building industry, I am writing to raise a concern with the language contained in the proposed update to the City's Climate Action and Adaptation Plan (CAAP), measure E-2.

The BIA has made a sincere effort to work with all jurisdictions to balance the need for attainable housing costs with efforts to move toward electrification criteria. However, as you know, the Ninth Circuit Court of Appeal's April 17th decision reversed a ban on natural gas hookups in the City of Berkely, finding the federal Energy Policy and Conservation Act (EPCA) preempts state or local regulations on energy use and gas appliances. The decision by the Ninth Circuit calls into question the legality of any electrification mandate brought forward by cities or counties while the case is under further consideration.

One of our primary goals is to create a business climate with certainty and predictability, which benefits builders hoping to partner with the City of Sacramento. We also hope that local jurisdictions avoid legal predicaments by attempting to enforce an ordinance that clearly goes against the ruling by the Ninth Circuit. For these reasons, we encourage the city to remove the mandate for all electric buildings from the CAAP update to avoid legal challenges brought on by anyone with the desire to build within the city with gas appliances.

Sincerely,

Vance Jarrard

Vance Jarrard, Legislative Advocate
North State Building Industry Association

Cc:
Mayor Darrell Steinberg
City Manager Howard Chan
City Attorney Susana Alcala Wood

1536 Eureka Road o: 916 677 5717
Roseville, CA 95661 **northstatebia.org**

From: Climate Action & Adaptation Plan
To: Climate Action & Adaptation Plan
Subject: FW: Save Sacramento Neighborhoods
Date: Monday, August 28, 2023 7:58:18 PM

From: Lynn Orion [redacted]
Sent: Wednesday, August 23, 2023 12:01 PM
To: Sac 2040 Gpu <sac2040gpu@cityofsacramento.org>
Subject: Save Sacramento Neighborhoods

Attention: Katie Valenzuela
I support the importance of Sacramento's Urban Forest and our established neighborhoods – in the Climate Action and Adaptation Plan, the 2040 General Plan, and all the accompanying documents. I ask the City Council and city staff to keep the importance of the Urban Forest and our neighborhoods at the forefront. There are virtually no provisions in GP 2040 or the CAAP to protect our existing, mature tree canopy - 80% of which is on private property, much of it in residential front and back yards slated for upzoning and increased density. I oppose the densification of Sacramento's existing diverse single family neighborhoods. Densification will lead to reduction of our mature tree canopy. Densification reduces open space available for trees and plants that are critical summer cooling, reducing air pollution and promoting habitat for birds and insects. Densification also creates congestion on narrow streets not designed for high densities. It promotes urban sprawl by reducing and eliminating the option for single family homes inside the city. Densification also does not result in affordable housing.

Sacramento City Council Meeting
August 22, 2023
Agenda Item #18
Public Review Draft of the Sacramento Climate Action and Adaptation Plan

Dear Mayor Steinberg and City Councilmember:

For all of the good things in the Climate Action and Adaptation Plan (CAAP), it has at least one glaring deficiency. Neither the draft CAAP, nor the draft General Plan 2040, have provisions for protecting our existing tree canopy. Planting trees alone will not get us to our canopy goals or make our city livable. Cutting down mature trees to build housing while making new plantings is less than a zero-sum game and will deplete the canopy, not grow it. New plantings give little canopy coverage for many years. In addition, in disadvantaged neighborhoods that were planned without park strips - public right-of-way between the sidewalk and the street - the city will need innovative approaches to greening those streets and neighborhoods.

Here are some specific comments on the CAAP. NB: some of these comments seem repetitive, but they are responding to the language and concepts that are repeated throughout the CAAP, and I have given page number references to the draft CAAP, so I hope that you will bear with me:

Page 5, Built Environment
Sustainable Land Use
I do not see how the city can retain the "lush urban forest" in established neighborhoods by upzoning all R-1 parcels for higher density (duplexes, triplexes and fourplexes) "by right" without objective design and zoning standards that would prohibit canopy loss. As 80% of the city's tree canopy is on private property, much of it front and back yards in residential areas, LUP-6.5 sounds like a hollow promise. A tree and a building cannot occupy the same space.

Page 5, Community Health and Resiliency
Urban Greening and Forestry
The baseline canopy should be 35% by 2030, 45% by 2045. Currently, Austin, Texas, another city with urban heat concerns, currently has a higher existing tree canopy and much higher goals.

> *Austin, TX: As of 2022 - 41% canopy coverage, up from 36% in 2018.*
> *Austin's Climate Equity Plan calls for 50% tree canopy coverage by 2050.*
> *https://www.austintexas.gov/blog/austin-closer-its-canopy-goal-50-2050-0*
>
> *Sacramento's canopy:*
> *More than 19% (Source: p. 7 - CAAP draft); actually:*
> *19.1% (p. 6 - Urban Tree Canopy Assessment 2018 by Davey Tree)*

Page 7, City of Trees
The concept of preserving our existing canopy is missing here. We must plant many trees in disadvantaged neighborhoods, but we cannot grow our canopy if mature, existing trees are being cut down for housing throughout the city. Planning and Zoning codes need to prioritize preserving the canopy.

In many disadvantaged neighborhoods, the city must also help maintain and water private trees, as these neighborhoods were planned without park strips/planting strips that are generally a public right of way for planting city street trees.

Page 15, Urban Heat Islands
We must plant many trees in disadvantaged neighborhoods, but we cannot grow our canopy if mature, existing trees are being cut down for housing throughout the city. Planning and Zoning codes need to prioritize preserving the canopy. The city's plan for housing growth is at cross-purposes with canopy growth without the proper protections in place.

Objective design standards are a must to keep the increased density from decimating the existing canopy, leave space for new tree plantings, and avoid the creation of new urban heat islands due to clustering of separately-approved development projects.

In many disadvantaged neighborhoods, the city must also help maintain and water private trees, as these neighborhoods were planned without park strips/planting strips that are generally a public right of way for planting city street trees. Streets with park strips have the advantage of city arborist services for city street trees.

Page 17 - Storms
Storm runoff is exacerbated by increased density, creates increased hardscape without green space and trees. Density must be carefully planned and zoned.

Page 19 - Groundwater Supply
Storm runoff is exacerbated by increased density, creates increased hardscape without green space and trees. We must have green space and trees to allow stormwater to run into our groundwater aquifer. Density must be carefully planned and zoned.

Page 53 - under Sequestration and Food Waste
Again, the concept of preserving our existing tree canopy is missing here. It, again, merely speaks of "tree plantings." It is hopeful that at the city is considering using strategies like complete streets to help address the lack of park strips (public right-of-way) in disadvantaged neighborhoods that were planned without them. There will need to be many creative ideas to shade the homes and streets in our disadvantaged neighborhoods.

Page 53, last bullet under Key Equity Concerns
Tree maintenance, stewardship, and who will bear the costs is a crucial need in disadvantaged neighborhoods. Water and arborists cost money that is in short supply in disadvantaged neighborhoods, and at least 50% are rentals.

Page 65 under
Buildings Strategy - 2nd column
E-5
Objective design standards are crucial to keep the increased density from decimating the existing canopy, leave space for new tree plantings, and avoid the creation of new urban heat islands due to clustering of separately-approved development projects.

In many disadvantaged neighborhoods, the city must also help maintain and water private trees, as these neighborhoods were planned without park strips/planting strips that are generally a public right of way for planting city street trees.

Page 68 under Carbon Sequestration Strategy
CS-1 The baseline canopy should be 35% by 2030, 45% by 2045.

Page 70 under Built Environment
E-5

Objective design standards are crucial to keep the increased density from decimating the existing canopy, leave space for new tree plantings, and avoid the creation of new urban heat islands due to clustering of separately-approved development projects.

In many disadvantaged neighborhoods, the city must also help maintain and water private trees, as these neighborhoods were planned without park strips/planting strips that are generally a public right of way for planting city street trees.

Page 71 CS-1 under Carbon Sequestration
The baseline canopy should be 35% by 2030, 45% by 2045.

Page 73 under Equity
Tree maintenance, stewardship, and who will bear the costs is a crucial need in disadvantaged neighborhoods. Water and arborists cost money that is in short supply in disadvantaged neighborhoods, and at least 50% are rentals.

Page 76 under Public Health, 2nd column, “Heat related illness …”
Again, the concept of preserving our existing tree canopy is missing here, and the document only speaks of “planting more trees.”

Page 78 under Adaptation, 1st paragraph
Again, the concept of preserving our existing tree canopy is missing here, and the document only speaks of “increasing tree canopy cover.”

Page 96
E-5.1 2nd bullet
I do not see how the city can retain the “lush urban forest” in established neighborhoods by upzoning all R-1 parcels for higher density (duplexes, triplexes and fourplexes) “by right” without objective design and zoning standards that would prohibit canopy loss. As 80% of the city’s tree canopy is on private property, much of it front and back yards in residential areas, LUP-6.5 sounds like a hollow promise. A tree and a building cannot occupy the same space. In addition, the city needs to end its short-term rental program that allows units that are not primary residences (such as entire homes, duplexes, ADUs, condo or apartment units) as this depletes available housing stock.

Short-term rental of units that are not the owner’s primary residence (entire homes, duplexes, ADUs, condo or apartment units). This practice must not continue as it depletes housing stock and drives up the cost of housing. The Elmhurst neighborhood, for example, is a “poster child” for Missing Middle Housing and Transit-Oriented development, yet its proximity to the UC Davis Health campus makes it a prime spot for entire residences that are short-term rentals, which are proliferating. This raises the price of housing as investors are competing with local homeowners and landlords, and flippers are looking to more quickly recoup the cost of renovations by turning homes into hotels.

Page 97

E-5.3 Some public transit stops are in the middle of residential neighborhoods, such as the 39th and 48th Street light rail stations in Elmhurst/East Sacramento. Allowing larger structures in established, residential neighborhoods will lead to canopy loss near these stations. In addition, the air quality maps in GP 2040 show that these areas have poorer air quality due to the nearby freeway (Highway 50). The appropriate area near the 39th Street station has already been zoned for high density where the GIO building now stands (over 200 units), as well as the old AT&T parking lot where a 41-unit townhome project is planned. Bus routes run through many established neighborhoods. The city must carefully assess where increased density

would be appropriate. Indiscriminately opening all land within 0.25 miles of public transit (or .5 miles as SACOG is asking for) will lead to canopy loss and loss of neighborhood character. There is also a large development planned at the 59th Street light rail station in SMUD's former corporation yard - https://www.sac59th.com/. Sac59th plans to have 108 single-family homes and 770 multi-family homes. This is one example of the city having to look carefully at where it will put higher density for Transit Oriented Development (TOD).

E-5.4 The city cannot retain the "lush urban forest"needed to combat climate change by upzoning all R-1 parcels for higher density (duplexes, triplexes and fourplexes) "by right" without objective design and zoning standards that would prohibit canopy loss. As 80% of the city's tree canopy is on private property, much of it front and back yards in residential areas, LUP-6.5 sounds like a hollow promise. A tree and a building cannot occupy the same space. In addition, the city needs to end its program that allows short-term rentals (Airbnb, VRBO, etc.) of units that are not the owner's primary residence (entire homes, duplexes, ADUs, condo or apartment units) as this depletes available housing stock and drives up the price of housing. Hotels are a more efficient use for short-term housing than depleting our housing stock.

Pages 123 - 124
CS-1.1 The baseline canopy should be 35% by 2030, 45% by 2045. The concept of preserving our existing canopy is missing here. We must plant many trees in disadvantaged neighborhoods, but we cannot grow our canopy if mature, existing trees are being cut down for housing throughout the city. Planning and Zoning codes need to prioritize preserving the canopy.

In many disadvantaged neighborhoods, the city must also help maintain and water private trees, as these neighborhoods were planned without park strips/planting strips that are generally a public right of way for planting city street trees.

Page 136
Sewer, stormwater, and flood control infrastructure
Increased hardscape and removal of our existing tree canopy and green space to create housing will lead to more stormwater runoff and less water going into, and replenishing, our underground aquifer. We need proper protections for our tree and green space resources embedded in our housing plans.

In an extreme flooding situation or other natural disaster, without a sufficient number of personal vehicles for evacuation, many Sacramentans could perish. Citizens will not be able to rely on public transit to get to safety. Does the city have a disaster plan to match its transit and mobility plans?

Page 138
I remain concerned about evacuation plans, as the city is planning parking and public transit strategies with the expectation that more of its citizens will become car-less. How will they evacuate? RT will be of little help for that massive number of people. During my working days, when the light rail broke down, even the "bus bridges" were a disaster and could not sufficiently get downtown workers home from downtown.

Page 139
Planning and Management Capabilities
In an extreme flooding situation or other natural disaster, without a sufficient number of personal vehicles for evacuation, many car-less Sacramentans could perish. Citizens will not be able to rely on public transit to get to safety. Does the city have a disaster plan to match and meet its transit and mobility plans?

Page 146 - Goal A-2
Neither GPU 2040 or the CAAP have provisions for preserving our existing, mature tree canopy. The city's plans to allow increased density through "missing middle housing" in mostly single-family zones, including in areas with good canopy holds the possibility of decimating the existing mature tree canopy and creating urban heat islands. This will be a net loss to the canopy if community development/planning cannot create robust objective standards to protect trees, maintain space for trees, and avoid clustering of separately-approved projects. In areas that lack good canopy, many lack public right-of-way planting space for city street trees, due to what we now see to be poor planning. The city planted and maintained thousands of trees in front yards in such areas, and then in the early 90s, abandoned these trees and left it to the homeowner to maintain them. In low income areas where at least half the homes are rentals, or the residents cannot afford arborist services, this has been a disaster, as the maps sadly show. As the city only owns 10% of the tree canopy, with another 10% on other government agency land, and 80% of the canopy on private property - mostly in residential back and front yards - something must be done to work with citizens to create and maintain our tree canopy. In the case of environmental and economic justice areas, this means funding for maintenance and watering.

Page 147 - ERC-8-2 Large Heat Islands
Streets lacks room for city street trees in many of its disadvantaged neighborhoods, which were planned without planting strips for city trees. It is a matter of economic and environmental justice not to merely provide “information and incentives” in such neighborhoods, but to fund and assist homeowners and renters (which are at least 50% in most neighborhoods) in planting, maintaining and watering trees, including arborist services that are provided in neighborhoods that have city trees.

Page 148 -

ERC-3-2: Tree canopy expansion. See my comments on ERC-3-3 below. You can’t expand the canopy if you are not adequately protecting the canopy that exists. We should strive to achieve 35 percent canopy cover by 2030 and 45 percent by 2045.

ERC-3-3: Tree Protection
This is virtually no protection for our existing, mature canopy. Requiring "private development projects to consider alternatives to removals of healthy trees" is no requirement at all. Requiring to "consider" is too weak of a standard to preserve our existing tree canopy. If there is a lack of objective design standards the trees will fall, especially in the case of ministerial approvals of projects large and small. Purporting to grow the canopy at one end (with understandably small initial plantings) and cutting down large, mature trees for housing projects, is worse than a zero-sum game.

ERC-3-6: Urban Forest Maintenance
As I have said elsewhere, the city needs to maintain trees that are NOT on city property in disadvantaged neighborhoods that were planned out without public right-of-way tree planting strips. These streets and homes deserve and must have the shade and increased air quality benefit of trees. This was a planning error that must be rectified.

ERC-3-11: Planting
The CAAP is, once again, “encouraging” development (ie developers) to do the right thing for preserving and growing our tree canopy. This must be a requirement for plan approval.

Page 150 A-2-3: Cooling landscape standards

I take objection to “The City shall prepare a Landscape Manual or enhance landscape standards… .” This is not an either/or situation. Both should be done, but if only one is done, enhancing landscape standards is a must.

Page 151

A-2-5: Urban Forest Plan
Finally, protection is mentioned as a component of the Urban Forest Plan. However the rest of the draft CAAP and draft GP 2040 do not support this concept.

A-2-6:
2nd bullet: “Opportunities to provide incentives or requirements” - is more squish language. Should be “Provide incentives and requirements for inclusion of trees in front, back and side yards…”
4th bullet: re Chapter 12.56 of the City Code related to tree permits for ministerial development project review
There must be objective design standards that are part of the ministerial review. Currently, after a project is approved and is a "done deal," the developer applies for tree removal permits. This is how we lose existing tree canopy.

Page 169
PFS-2-3: Evacuation routes
Again, I express my concern for evacuation plans that include the fact that the city is planning parking and public transit strategies with the expectation that more of its citizens will become car-less. How will they evacuate? RT will be of little help for that massive number of people. During my working days, when the light rail broke down, even the “bus bridges” were a disaster and could not sufficiently get downtown workers home from downtown. Robust plans will need to be in place to move people and their pets out of danger.

Page 174
A-5 13: Public Education Campaign for Everbridge System
Hasn’t the city and country transitioned from Everbridge to the Smart 911 system? I received a notice on November 30, 2022, from the Sacramento County Office of Emergency Service on Everbridge, to transition to Smart 911 (Rave) and that the transition would be completed by December 31, 2022.

Page 179

ERC-5-2: Reducing Storm Runoff
Instead of “encouraging designs that,” it should be “require designs to.” In addition, limiting project size to allow the use of green space and trees would mitigate storm runoff.

PFS-4-5: Comprehensive Water Supply Planning
Why does the city allow Nestlé to take and bottle our city’s water, a valuable resource, while citizens are asked to conserve? Is creating and selling plastic bottles of water good for the environment? This is counterproductive to CAAP goals. Why is Nestlé getting water so cheaply - at regular consumer rates and not commercial rates - when they are a multinational corporation? According to answers given to the Dan Bacher and posted to The Daily Kos April 2015, Nestlé “does not have a special agreement or contract for water services.”
https://www.dailykos.com/stories/2015/4/10/1376873/-City-of-Sacramento-s-responds-to-my-questions-about-Nest
If there is no contract or special agreement the city should end this practice as soon as practicable.

Page 180
A-6-2: Perform a Groundwater Recharge Feasibility Study
Less hardscape, more green space and trees allow stormwater to drain into, and recharge our groundwater.

Page 186
Measure CS-1
Urban tree canopy cover should be increased to 35% by 2030 and 45% by 2045.

Thank you for your consideration of my comments.

Best,

Francesca Reitano
Elmhurst neighborhood
In my private capacity:
Board Member, Elmhurst Neighborhood Association
Save Sacramento Neighborhoods
Trees4Sacramento

Amy Yang

From: Steve Rosen [redacted]
Sent: Monday, June 12, 2023 10:24 AM
To: Sac 2040 Gpu
Subject: GPU 2040 Comment

Good morning.

Regarding the corridor development strategy:

Cramming population along the most polluted streets in the city is inequitable and a crime against environmental justice. The benefits accrue to the homevoters behind the corridor, who see unsightly strip malls get replaced. The costs of poor health and shorter lifespans are imposed on the people who have to settle for living in the deadliest parts of our city.

In addition to the traffic deaths that await them right outside their front doors and the air pollution that will be worse from EVs' worse tire and brake particulate pollution, noise pollution (from tires on pavement and car audio systems) literally kills.

Noise pollution kills:
https://cas5-0-urlprotect.trendmicro.com:443/wis/clicktime/v1/query?url=https%3a%2f%2fwww.nytimes.com%2finteractive%2f2023%2f06%2f09%2fhealth%2fnoise%2dexposure%2dhealth%2dimpacts.html&umid=47357919-fd53-4267-9ece-d28fb6e38ab5&auth=0c78d5381d8efeba9ba4477b3ca23a49d0ab462f-1115e9ae5bf9bd6c9ee86453497ac696305dc27e

Upzone the neighborhoods, not just the strip malls. Our children and grandchildren deserve better.

There are more important things in the world than endlessly increasing single-family house resale prices and protecting the petty aesthetic preferences of existing homeowners.

Thank you.

Steve Rosen
Eric Guerra's District

Amy Yang

From: Steve Rosen [redacted]
Sent: Monday, June 12, 2023 10:24 AM
To: Sac 2040 Gpu
Subject: GPU 2040 Comment

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In addition to the traffic deaths that await them right outside their front doors and the air pollution that will be worse from EVs' worse tire and brake particulate pollution, noise pollution (from tires on pavement and car audio systems) literally kills.

Noise pollution kills:
https://cas5-0-urlprotect.trendmicro.com:443/wis/clicktime/v1/query?url=https%3a%2f%2fwww.nytimes.com%2finteractive%2f2023%2f06%2f09%2fhealth%2fnoise%2dexposure%2dhealth%2dimpacts.html&umid=47357919-fd53-4267-9ece-d28fb6e38ab5&auth=0c78d5381d8efeba9ba4477b3ca23a49d0ab462f-1115e9ae5bf9bd6c9ee86453497ac696305dc27e

Upzone the neighborhoods, not just the strip malls. Our children and grandchildren deserve better.

There are more important things in the world than endlessly increasing single-family house resale prices and protecting the petty aesthetic preferences of existing homeowners.

Thank you.

Steve Rosen
Eric Guerra's District

August 11, 2023

Mayor Steinberg and City Councilmembers
City Hall, 915 I Street
Sacramento, CA 95814

Re: Climate Action and Adaptation Plan

Thank you, Mayor, Council and everyone associated with drafting this important plan for Sacramento's future. Sacramento Area Bicycle Advocates' (SABA) mission is to advocate for and support safe streets for all users, and especially for those who use a bicycle for their daily transportation. We support the Climate Action and Adaptation Plan (CAAP) because it will further our goals and priorities for all Sacramentans to enjoy safe streets and paths. Safe infrastructure for alternative modes of transportation like bikes and e-bikes - which, notably, are far superior to electric motor vehicles in terms of reducing emissions and moving the needle on climate action - is much needed and will have benefits for generations to come.

While we applaud the work done to date, we believe that the CAAP doesn't go far enough in regards to active transportation and the role it can play in reducing VMT. The Mayors' Commission on Climate Change set a target of reaching 30% modeshare by 2030 and 40% by 2045. These targets are far more ambitious than the 6% by 2030 and 12% by 2045 set within this plan. In addition, the CAAP states that "it cannot use "trips" as a metric for modeshare", but then goes on to discuss the metrics used in 2016, and then sets our current modeshare of 2% as the baseline from which to measure progress. We strongly encourage the City to **identify higher targets for modeshare**, especially given that the City views active transportation at the top of the sustainable transportation hierarchy (see Fig. 6-1).

In order to meet these higher targets for modeshare, the City must take meaningful action to improve conditions for active transportation options in Sacramento. Completing the implementation of the 2016 Bicycle Master Plan (BMP) (TR-1.1) is a step in the right direction,

because having a safe, connected low-stress, complete bicycle network where anyone can get to their destination by bicycle would greatly enhance the livability of Sacramento. The current effort "Streets for People" will update the BMP and should be the resource used for guidance. In addition, the Transportation Priorities Plan (TPP) has strong guidance on where infrastructure investments should be made first – in our historically underserved communities. Ensuring that these plans are used as guidance for planned work and equitable investment is crucial for the City to make good on prioritizing communities that have been traditionally left behind.

The same holds true for the Pedestrian Master Plan (PMP), last updated in 2006 (TR-1.2). Walking is Sacramento is often seen as the most dangerous way to get from A to B[1], so it is vital that Sacramento make walking safer. It is time to stop thinking in silos – that street projects only involve cars, that pedestrians are only on sidewalks – and instead think about infrastructure changes holistically. The concept of complete streets is a step towards that, but there is no mention in the action steps in the transportation section of the CAAP of changing streetscapes to create complete communities. As the adage goes, "if it's not written into the plan, it won't get done", so we ask that **the CAAP explicitly include strategies for speed reduction, roadway design, additional tree canopy and re-design with Vision Zero and Complete streets requirements**. Sacramento needs to think holistically about how to center people first, not cars. Our street infrastructure needs to be changed to serve and support people writ large, not just drivers, and must include the creation of a user-friendly, truly connected bicycle and pedestrian network.

We ask that the plan **include the creation of Low/Zero Emissions Zones**. These zones are a clean air strategy[2] for cities and present a strategic opportunity to rethink livability and sustainable mobility. They are zones where walking/biking/transit are prioritized. Only low or zero-emissions vehicles are allowed. We encourage the City to include pedestrian zones and superblocks[3] into the CAAP.

We also ask that the City take a bold step and **eliminate parking** in the downtown area, and stop subsidizing parking throughout the city (TR -2.2). Parking requirements increase housing costs[4], VMTs, and carbon emissions—both directly (embodied carbon of garages) and indirectly (sprawl, induced car ownership). Sacramento should be reducing, or better yet, eliminating parking, especially near transit.

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[1] Dangerous by Design: How Sacramento's un-walkable roads imperil and kill Black residents. A. Yoon-Hendricks and P. Reese. The Sacramento Bee, August 30, 2021 https://www.sacbee.com/news/local/article252514378.html

[2] https://www.c40knowledgehub.org/s/article/How-C40-cities-are-implementing-zero-emission-areas?language=en_US

[3] https://www.youtube.com/watch?v=ZORzsubQA_M

[4] https://ggwash.org/view/82896/could-nixing-parking-requirements-help-transform-virginias-cities

The CAAP does include supporting shared rideables (bikes and scooters) to enable the reduction of 1 million VMT per year (TR-2.7), however shared rideables will not get us to the target because of the instability of shared rideable companies. This action relies on heavy subsidization of shared rideables, and, for the companies contracted to work in Sacramento, oversight is needed to ensure consistent services to our residents. In addition, we think that the City should **create incentives for individuals to purchase e-bikes.**

E-bikes, the fastest growing sector in the bicycle industry, are quickly changing the landscape for cyclists. They are non-polluting, fast, and easy to ride. Their potential for increasing the percentage of modeshare stated above is high, and Sacramento should consider how more people on e-bikes can have a positive impact on the city. Less congestion, less noise, less pollution and positive benefits for health and enjoyment, all while making short trips around town. In addition, cargo bike logistics should be prioritized in urban areas. Cargo bikes can play an outsized role in last mile solutions[5]. Plus, they are quick and affordable versus the cost of cargo vans, gas, and parking tickets. We encourage the city to add an action related to **incentivizing citizens to purchase e-bikes and for businesses to invest in e-cargo bikes**.

Sacramento is ready for action on these issues. However, climate action plans are not enough. Sacramento needs funding. We need policies and leaders who will *implement* these plans. Leaders who will champion hitting the targets and goals of these plans, preferably years before target dates. We need Sacramento to step up and lead, prioritizing climate action for a livable city.

We look forward to working towards these action steps to create a more walkable, bikeable livable city.

Respectfully,

Debra Banks, Ph.D.
Executive Director, Sacramento Area Bicycle Advocates

[5] https://ecf.com/news-and-events/news/cargo-bikes-rise-reimagining-city-logistics

Sacramento City Climate Action & Adaptation Plan (CAAP)

SacEV.org

Sacramento Electric Vehicle Association EV Comments

SacEV would like to thank the city for its tremendous effort in putting together this Climate Action & Adaptation Plan. We appreciate the City's support of efforts to fight climate change by getting more electric vehicles on the road. We hope the final adoption of this plan will allow the City Council to prioritize climate action and champion measures that will improve the wellbeing of Sacramento's residents and visitors.

SacEV is one of California's leading volunteer non-profit Electric Vehicle organizations with over 700 members in the Sacramento region. The organization supports the adoption of EVs in the Sacramento region through education, infrastructure support and demonstration. SacEV has held or participated in 400 events educating and gathering insights from over 100,000 community members.

EVs save our communities money, promote clean air and are powered with clean, affordable, domestic electricity[1].

Climate Emergency declarations across the country and the world reflect the urgency for action on combating climate change. Time is not on our side.

Key Observations

1. **Transportation is the single largest contributor to GHG production and general air pollution. The gap between the CAAP CO2 target and the City's net zero target can be substantially reduced by transitioning gas cars to clean EVs through the normal vehicle turnover process, if the City's staff and residents are encouraged to do so.**

   Accelerating EV adoption provides an effective, achievable, timely and affordable aspect of CO2e reduction. There needs to be clear actions to drive to the 2025, 2030 and 2045 targets for EV adoption by city staff and residents. The CAAP sets targets for significant CO2e reductions, but can, and needs to be more aggressive. Growth of EV sales in Sacramento have averaged 50% year over year and the country is entering the steep portion of an S curve. This opens up substantial opportunities to reduce GHGs and pollutants that affect the health of our communities.

[1] Note our estimates are often for Sacramento County when city numbers are not available.

Continuing the 50% year over year growth of EV Sales is achievable given the wide selection of over 100 EV models available in Sacramento, their decreasing prices and state/federal incentives.

2. **An effective CAAP must be broad based and support all our communities. A strategy of encouraging staff and residents to transition to an EV on their next vehicle purchase requires ensuring residents can charge conveniently, affordably, safely and with certainty. To achieve the City's CO2e reduction goals all communities must be included.**

   In 2015, the Building Standards Commission set the CalGreen requirement for 100% of new single family homes to include EV charging infrastructure while apartments and condos were set to 3%. This structural inequity results in community members in DAC's being restricted from the benefits of electric transportation. The city should continue its prior leadership by requiring all new MFH construction to include dedicated charging infrastructure for all residents and increased long dwell charging at the workplace[2]. Surveys consistently find that charging at home is the top preference with workplace charging coming in second.

3. **Low Cost Incentives and Education Are Still Key to Effective EV Adoption and CO2e Reduction, for staff, commuters and communities.**

   EV buyers invest their personal funds to help our communities achieve clean air and reduce CO2es. Even with California and federal incentives, many potential buyers are still on the fence with respect to EV purchases. Several studies[3] have shown that as EV adoption shifts to the Early Majority, incentives become even more important.

Following are comments to specific planned or missing actions in the CAAP

MEASURE TR-3: Achieve Zero-Emission Vehicle (ZEV) Adoption Rates of 28% for Passenger Vehicles and 22% for Commercial Vehicles by 2030 and 100% for all Vehicles by 2045

Accelerating EV adoption provides an effective, achievable, timely and affordable aspect of CO2e reduction. There needs to be clear actions to drive to the 2025, 2030 and 2045 targets for EV adoption by city staff and residents.

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[2] Our whitepaper on "Space Sharing vs. Power Sharing" provides a comprehensive look at the workplace charging challenge and proposes effective power-sharing solutions.

[3] Some of the latest studies were presented by the UC Davis Institute of Transportation Studies to California Air Resources Board on December 4th, 2018.

- The CAAP sets targets for significant CO2e reductions[4], but can, and needs to be more aggressive. Growth of EV sales in Sacramento have averaged 50% year over year and the country is entering the steep portion of an S curve. This opens up substantial opportunities to reduce GHGs and pollutants that affect the health of our communities. Continuing the 50% year over year growth of EV Sales is achievable given the wide selection of over 100 EV models available in Sacramento, their decreasing prices and state/federal incentives.
- Striving to continue the 50% EVs growth would result in EVs being 39% of the on-road vehicles by 2030 saving ~2MMT CO2e, as opposed to the CAAP plan's 28% . Currently the 1.1M gas vehicles in Sacramento county emit ~5MM tons of CO2e emissions annually.
- Charging infrastructure is critical for EV adoption. As Consumer Reports reported "... lack of access to home charging can cause many consumers to shy away from EVs." There are five crucial attributes to EV charging: convenience, safety, certainty and economics. Charging at home dominates these attributes. Workplace charging comes in second. Public fast charging is important for less frequent road trips, and provides charging certainty, though it is weak on convenience, safety and economics.

In order to support a high rate of EV adoption, resources must be jointly invested in partnership with SMUD, SACOG, the SMAQMD to ensure this level of public charging This is very important for residents of Multi Family Homes (MFH) who do not have access to charging at home.

For residents who live in MFH the public DC fast charging station will be the equivalent of their home charging station, and therefore the price of electricity at these charging stations will need to be significantly less than the price of gasoline on a per mile basis in order to support EV adoption. This is especially key for low income or residents in Disadvantaged Communities. Providing public charging stations where the price is almost the same as gasoline is not likely to create the rate of adoption the City is targeting. Therefore, the City should partner with SMUD to identify ways that low income and DAC residents can be provided with the same low-cost rates and pricing for electricity at public DC fast charging stations as the off-peak rates that residents of single family homes have access to.

Three city actions are crucial:

- Set building codes in new MFH and workplace construction to include charging infrastructure for all residents.
- Provide workplace charging incentives to encourage residents to transition to EVs, particularly residents in DAC without home charging access.
- Provide widespread education on EV adoption.

Sacramento can provide proven low cost, proven incentives that will accelerate EV adoptions. At relatively low cost the city can provide garage EV incentives that encourage workers to make their next car purchase an EV and are cost neutral to the city.

[4] Countywide we expect ~4,083,452MT CO2e rather than the 807,854 MT CO2e specified in the CAAP

***Proposed TR-3.1: Amend City Building Code to require at least 20% EV-capable charging spaces and at least one installed, operational Level II EV charger in new multifamily and nonresidential development. Amend the Planning and Development Code to incentivize charging in both existing and new developments*.**

As the CAAP points out "EV-ready building codes are one of the most effective and low-cost strategies for states and local governments to encourage consumers to buy or lease electric vehicles, and can save consumers thousands of dollars in installation costs." Costs to retrofit EV charging infrastructure can easily exceed $10,000 per handle.[5]

- TR-3.1 is outdated and doesn't reflect the existing or upcoming CalGreen building codes [6], nor does it recognize the dramatic increase in affordable EV models in the new and used car market.
- New MFH construction must include EV charging infrastructure for each resident with a parking space. This is necessary to reduce the city's carbon footprint, as well as enabling DAC residents to purchase, own, operate and benefit from EVs. Substantial state and federal incentives are available for EV ownership, but without charging that is available, convenient, affordable and safe, EV ownership is not practical.
- The CalGreen building code effective January 1st, 2023 already exceeds the charging requirement specified in the CAAP. The city should continue its leadership in supporting EV adoption in all communities by supporting Tier 2 of the non-residential CalGreen building code[7] for workplace charging.
- The Sacramento CAAP plan should align with the Sacramento County CAP proposal GHC-19. It, along with GHG-10, opens EV adoption to residents in older homes, apartments and condos, which comprise nearly a half of our community and are common in underserved communities.

Proposed TR-3.2: Continue to support a variety of public and public/private partnerships to provide more publicly accessible chargers throughout the City. Examples include public/private partnerships on private property (Electrify America), public/private partnerships on public property (EVgo), and public investment (SMUD).

TR-3.1 can ensure that families residing in new MFH construction will have equitable access to EV charging. Charging solutions are still needed for the majority of families in existing MFH units and SFHs without off-street parking that don't have access to charging.

- We support the CAAP's priority to support DCFC expansion near low income and disadvantaged communities.

[5] PGE Data from 2019.
[6] Summary of upcoming CalGreen EV requirements for 7/1/2024 can be found here.
[7] Summary of upcoming CalGreen EV requirements for 7/1/2024 can be found here.

- Coordination between DCFC providers, SMUD and the administrators of the CVRP funds should ensure that residents in DACs have a charging cost that is comparable to SFH charging, even though DCFC is less convenient, less safe, less certain than home charging.
- Convenient on street charging to support families in older homes without off street parking should be explored. Solutions have been developed that provide residents with a safe solution for charging[8]. Innovative approaches brought to the city should be considered in pilots to increase the range of solutions.

Proposed TR-3.3: Continue to install and provide EV charger access at City owned facilities and parking garages.

Providing EV charging access[9] at City owned facilities and parking garages has been proven to be a highly effective incentive to move city commuters to adopt EVs. However, policies need to be updated to re-incent EV adoption. Note additional comments in TR-3.7.

- Providing EV charging access at City owned facilities and parking garages has been proven to be a highly effective incentive to move city commuters to adopt EVs. Including monthly parking discounts can offset the inequity with those who lack the ability to charge at home, such as for older homes without off-street parking and MFH without charging access.
- Workplace charging program costs should include consideration of flat monthly fee options that minimize costs to the City and to the EV driver, or pricing options that do not exceed the cost that residents of single family homes have access to at home.
- Include monthly parking discounts for limited periods. Free charging not only accelerates EV adoption for all income levels and demographics, but it can also offset the inequity situations through lack of home charging ability for older homes without off street parking and MFH without charging access.
- Charging infrastructure should be reviewed to support employers and employees. Level 2, Low Level 2 or Level 1 workplace charging provides the most convenient charging for those without access to home charging. **Charging designs should avoid requiring employees to leave work and move their EV one or twice a day.**[10]

[8] Examples include Lamppost charging solution from Ubitricity, Trojan AON, cable gullies, trip-free channels installed in the pavement or over the payment, and small ramp laid across sidewalks.
This personal charger is installed in the pavement right outside your property.
If you don't have a driveway, you can also ask your local council to install an EV charger on your street.
[9] will likely include many public-facing community locations. A key priority for the EVSE expansion plan is to increase charging access in low income and disadvantaged communities.
[10] See the paper Space Sharing

Proposed TR-3.6: Continue to maintain a highly streamlined EV infrastructure permit process.

The cost and availability of commercial and residential EV charging infrastructure is highly dependent on ability to secure appropriate agency permits. Discussions with regional contractors have indicated that Sacramento city has the opportunity to simplify and accelerate the process and join the success of cities such as Los Angeles. We applaud the city's alignment with the state charging permit streamlining standards, but the importance of effectively deploying charging infrastructure make this an area of focus by lowering development costs and shortening timelines.

- Work with SMUD to provide customer bill peak demand or place on customer utility bills monthly / yearly peak load demand for performing.load calculations.
- Specific measurement and department independent verification of state streamlining measures would help identify areas of improvements
- An ombudsman to assist contractors in the permit process.

Proposed TR-3.7: Develop and implement a fee for use of City-owned parking facilities and EV chargers to promote more efficient use and turnover and increase EV availability for people who really need it, including those without access to home charging.

We applaud the intent of supporting those without access to charging at home, such as apartments, condos, and homes that only have access to on-street parking. In these cases EV ownership becomes an inconvenience and cost challenge most consumers will be unwilling to tackle. For these residents, range anxiety has been replaced by charging anxiety as the top impediment to EV adoption. We know commuters are unlikely to switch to a clean electric vehicle without charging that is readily available, affordable, and reliable, and certain.

Workplace charging can help bridge the residential charging gap, providing consumers with charging access at work, where their car often sits for eight hours during the day. Chargers at work are also helpful for owners of older, shorter-range EVs.

Sacramento City's early EV charging implementation with a focus on Level 2 charging at the workplace was very effective in encouraging EV adoption. However, as success built, congestion at chargers followed and the value of the charging infrastructure diminished, with drivers competing for a limited number of charging spaces. Some parking providers "solved" the congestion problem through "Space Sharing". This approach forces EV drivers to move their EV as soon as it has sufficient charge, so another EV driver can get a charge, but this "sharing" process requires lots of coordination that can be very time consuming. The rationale is that since Level 2 charging can provide the minimum needs of most commuters within two-to-four hours of use, applying various schemes to force charging space turnover will allow more EV

drivers to use the existing charging infrastructure. Common techniques for forcing turnover include parking time limitations with citations and charging fee rate escalations.

This is what TR-3.7 aims to do with forced turnover. Forcing charging station turnover does increase availability – but at a cost to local businesses, organizations, individuals, visitors and employers. The goal should be to provide charging without disrupting the workplace or visitors. This whitepaper[11] about "space sharing vs. power sharing" provides a comprehensive look at the challenge and proposes that power-sharing options are more effective solutions.

- We recognize the City parking program had been highly successful for many years. However, its success along with minimal improvements to the program has led to charging congestion among existing EV drivers to the point of discouraging potential new EV drivers, and is therefore no longer effective at encouraging EV adoption. We recommend additional changes that will result in re-opening discounted monthly parking passes for new EV owners. This may require changing the management protocol of the two year long wait list for monthly parking passes.
- SacEV supports the CAAP's plan to increase parking fees for non-EVs to achieve a revenue neutral facility. The highly effective substantial monthly parking pass discounts for EVs should be limited to two or three years after a new or used EV is purchased or leased from a vehicle dealership.
- We recommend additional changes that will result in re-opening discounted monthly parking passes for new EV owners. This may require changing the management of the two year long wait list for monthly parking passes.
- Priority consideration can be given to match the income and vehicle MSRP requirements established by the federal Inflation Reduction Act, or similar selection criteria.
- Note related comments for TR-3.3.

Proposed TR-3.8: Work and collaborate with major employers including the State of California and Sacramento County to promote ZEV adoption, programs, and improvements to ZEV infrastructure.

SacEV has had a provided substantial outreach and education over ten years to our communities including businesses, schools, social organization

- This is a crucial action to accelerate adoption rates at a very low cost.

[11] The paper can be found at: https://docs.google.com/document/d/e/2PACX-1vS24xwot4E8kcHeX8bRx6RtA_KfM7RmSfuNJ56zfX05rNqFr_Ssg5-MePUlO3vpIIBM4-heJukLfWul/pub

Proposed TR-3.10: Coordinate with community-based organizations, agencies, and non-profits to conduct EV education events which would include information on costs/ benefits of owning EVs, steps on how to receive incentives for EV chargers, as well as other benefits. Events will be equitably distributed across the City, focusing on disadvantaged communities.

SacEV has provided substantial outreach and education over ten years to our communities including businesses, schools, social organizations. There is significant opportunity to increase the exposure of our communities to the benefits of EVs.

- Each city newsletter should include at least two items on EVs. There is no shortage of regional information relating to EVs.
- Every city sponsored event should include a component to educate community members about EVs.
- City venues should be made available for EV education, demonstration or outreach events at no cost to volunteer based organizations.
- Each request for a city venue should include a portion of education about EVs.
- Providing demonstration EVs at any event should not incur additional fees such as parking permits.

MEASURE E-3: Transition Natural Gas in Existing Buildings to Carbon-free Electricity by 2045

E-3.1: Develop a comprehensive existing building electrification strategy that identifies associated costs and addresses potential equity impacts prior to implementation of mandatory requirements.

Proposed E-3.2 Develop an electrification ordinance for existing buildings/construction that will be implemented through the building permit process to transition away from fossil fuels to
electric at time of replacement following adoption of Measure E3.1.

The building's ordinance should include the addition of EV charging capabilities
.

- If a service feed is reviewed, capacity checks should include future EV charging. Residents should not be required to rework their infrastructure in subsequent years as they adopt EVs.
- Sizing of panel and transformers should include sufficient capacity for adding EV charging for each family whether single family or multi-family homes.
- All residential sales should have an EV capable infrastructure (CalGreen code since 2014) installed when a home is sold. An EV capable circuit would not require a charging station to be installed.

Municipal Measures (MM): Municipal measures define core strategies that will result in reductions in GHG emissions at the municipal level

The City of Sacramento has developed its own plan to make substantial progress towards achieving carbon neutrality in all municipal operations by 2045. These measures and actions align with both the Mayors' Commission on Climate Change and the CAAP's ambitious community measures and actions and will allow the City to continue its role as a leader in climate action both within the community and the region. The City has developed a suite of measures and specific actions, identified in this chapter, that will collectively reduce emissions 74% below 1990 levels by 2030, and near zero in 2045.

Proposed MM-2 Electrify or decarbonize 100% of light-duty fleet vehicles by 2035 and 100% of municipal fleet by 2045.

The city of Sacramento should continue to lead in decarbonization of its fleet. SacEV will make additional recommendations in September.

Proposed MM-8 Reduce City employee commuter VMT.

SacEV supports this goal.

- To gauge an accurate picture of impact on CO2 emissions, the measurements (even if estimated) should separate EVs from ICEVs.

Proposed MM-9 Encourage an increase in the number of employee-owned EV and plug-in hybrid electric vehicles 28% by 2030 and 100% by 2045

- As an employer the city has significant opportunities for staff incentives and education to adopt EVs. There has been a dramatic increase in affordable EV models in the new and used car market. There is no reason the city shouldn't be able to set and reach a higher target to employee owned EVs starting 25% in 2025.
- We recognize the parking program had been highly successful for many years. However, its success along with minimal improvements to the program has led to congestion such that the existing program is no longer effective in encouraging EV adoption. Changes to the program are necessary to make it an attractive inducement for EV adoption.

Proposed MM-9.1 EV Chargers – Implement the 2017 EV Strategy directive to meet or exceed CALGreen Tier 2 standards for EV chargers, and transition existing facilities to provide EV charging capacity as feasible.

CALGreen Tier 2 standards have been revised and are being prepared for distribution[12]. There has been a dramatic increase in affordable EV models in the new and used car market. Many city staff reside in condo, apartments or older homes without off street parking. Substantial state and federal incentives are available for EV ownership, but without charging that is available, convenient, affordable and safe, EV ownership is not practical.

- Specific charging infrastructure targets should be set.
- We are particularly concerned about the phrase as feasible, which can easily be applied to nearly any situation. While exceptions may occur, they should be reviewed for approval by the city council.

Proposed MM-9.3 EV Rebates – Provide information to all City staff about local, State, and federal rebates annually. Include lifecycle and maintenance cost information of EV ownership.

The city has significant opportunities for staff incentives and education to adopt EVs.

- The city should participate, along with SMUD, in the two major national EV outreach events each year - National Drive Electric Week (Fall) and Drive Electric Earth Day (spring.) At a very low cost, leveraging these events can provide updated information to staff (and the public) about new EVs, programs, incentives, and more.
- There has been a dramatic increase in affordable EV models in the new and used car market which should be shared with staff.
- There is no reason the city shouldn't be able to set and reach a higher target to employee owned EVs starting 25% in 2025.

[12] Summary of upcoming CalGreen EV requirements for 7/1/2024 can be found here.

SACRAMENTO METROPOLITAN
AIR QUALITY
MANAGEMENT DISTRICT

August 31, 2023

Greg Sandlund, Planning Director
City of Sacramento Community Development Department
300 Richards Boulevard, 3rd Floor, Sacramento, CA 95811

Subject: Public Review Draft of the Climate Action & Adaptation Plan

Dear Greg Sandlund,

Thank you for providing the Sacramento Metropolitan Air Quality Management District (Sac Metro Air District) with the opportunity to review the Public Review Draft of the Climate Action & Adaptation Plan (CAAP). This draft acknowledges and addresses many of our previous comments and we commend the measures taken to combat the threat of climate change on the Sacramento region. We offer the following comments and recommendations to benefit the residents of Sacramento through greenhouse gas emissions reduction, air quality improvements, improved community safety, community resilience and public health.

Chapter 1 – Introduction

- Extreme Heat Days, p. 13: Although Cal-Adapt defines extreme heat as the 98th percentile value of historical daily maximum/minimum temperatures observed at a location (from 1961–1990, between April and October), research shows that health impacts can occur at lower temperature thresholds, especially for sensitive populations. We recommend adding a sentence explaining that heat health risks can occur at lower temperature thresholds. The city could also discuss the increase in frequency of warm nights which prevent the human body from cooling down at night. The Urban Heat Island Effect also contributes to warmer than average nights, by trapping excess heat during the day and releasing it throughout the day and night.
- Heat-Related Illnesses, p. 14: Consider explaining that there are additional health consequences beyond heat illness and heat stroke. Extreme heat events can worsen chronic conditions including respiratory, cardiovascular, and diabetes-related conditions.[1]
- Urban Heat Islands, p. 15: Sac Metro Air District's Urban Heat Island project modeled urban heat islands in the Sacramento region and evaluated various strategies to combat the effects of heat on urban populations. Along with increasing tree canopy, the project found that strategies such as installing cool roofs and cool pavements deployed at the local and regional scale provide effective heat mitigation for neighborhoods impacted by urban heat islands. By increasing the albedo/solar reflectance of existing surfaces using high albedo materials like sealants and

[1] World Health Organization, Heat and Health, June 2018, https://www.who.int/news-room/fact-sheets/detail/climate-change-heat-and-health

coatings in combination with increased vegetation cover, neighborhoods could experience cooler temperatures.[2]

- Extreme heat is deadlier than other natural hazards making it crucial for local jurisdictions to provide heat mitigation for new and existing infrastructure in areas impacted by urban heat islands. Our recommendation is to implement a local ordinance requiring the installation of roofs with a solar reflectance index (SRI) of either 78 for low-rise or high-rise residential buildings with a roof slope of ≤ 2:12, or an SRI of 20 for low-rise or high-rise residential buildings with a roof slope of > 2:12. Solar reflectance index indicates a surface's ability to return solar energy back to the atmosphere. A higher SRI contributes to a lower surface temperature. The city should encourage cool roof adoption for homeowners. As noted in our previous CAAP comment letter, if adopted at scale, cool roofs can reduce peak demand and increase grid stability.
- In areas with low albedo, install cool pavements or cover traditional pavements with sealants that have an albedo of 0.30 or greater. The city should require road repair and new roadway improvement projects to install cool pavements with an albedo of 0.30 or higher. Sac Metro Air District is developing an Urban Heat Island Reference Guide to assist local jurisdictions in their plans to implement heat mitigation. The final version of this guide will be shared with the City of Sacramento.

Chapter 4 – Community Engagement

- We commend the additional steps the city took to engage underrepresented communities including youth and populations most vulnerable to climate change in the CAAP planning process and address any maladaptation from the city's proposed measures. Climate change is a global phenomenon that disproportionately affects communities least responsible and least able to adapt to the changing environment. The inclusion of climate equity and focusing resources within historically marginalized communities will help ensure that Sacramento effectively and efficiently addresses climate change for all impacted communities.

Chapter 5 – GHG Reduction Strategies

- In the "Environmental Quality" section on page 79, it is best to spell out "NOx" as nitrogen oxides since this is the first time it is referenced in the document.

Chapter 6 – GHG Reduction Measures and Actions

- Provide a status update of the new framework for the electrification of existing buildings to be considered by City Council, mentioned on page 88.

E-1: Support SMUD as it Implements the 2030 Zero Carbon Plan

- Include specific actions the city will take to support SMUD with implementation of the 2030 Zero Carbon Plan. The CAAP lists permitting of new projects, coordination of land use and energy efficiency projects, and encouraging public support for the 2030 Zero Carbon Plan as possible steps that can be taken, but it would be more effective to definitively list which actions the city

[2] Sacramento Metropolitan Air Quality Management District, Atmospheric Modeling for the Development of a Regional Heat Pollution Reduction Plan – Technical Project Report, February 2020, https://www.airquality.org/LandUseTransportation/Documents/Altostratus_Final_Report.pdf

will take to achieve Measure E-1. The installation of solar and battery storage is mentioned on page 73. If renewable energy and energy storage are city goals, they should be listed as supporting actions for Measure E-1.

- The city mentions that Measure E-1 primarily falls on SMUD to implement. The city should discuss contingency plans in the CAAP if Measure E-1 and the plans for SMUD to eliminate GHG emissions from its power supply are not achieved by 2030.
- Sac Metro Air District recommends explaining how the 2040 General Plan policies LUP A.5 Sustainability and Carbonization Standards and LUP A.7 Net-Zero Energy or Net Positive Design play a role in the city's goal of supporting SMUD in the implementation of the 2030 Zero Carbon Plan.

E-3: Transition Natural Gas in Existing Buildings to Carbon-free Electricity by 2045

- Sac Metro Air District recommends the city continue to explore options to fund building decarbonization to support Measure E-2. As an example, the City of Rancho Cordova is proposing a utility user tax on natural gas to help fund building decarbonization with a utility user tax increase of 3% to incentivize electrification and generate funding for retrofit projects.[3]
- Sac Metro Air District still encourages the city to embody a stronger commitment to replace existing natural gas stoves with induction cooktops to improve indoor air quality, safety, and public health. Natural gas stoves release hazardous air pollutants including methane, and they result in waste heat that could compound heat-related illnesses during high heat events. The city's 2040 General Plan prioritizes identification of funding and resources for the electrification of lower income and income restricted housing for health and safety improvements including air quality improvements. This funding would support the replacement of natural gas stoves with induction cooktops and ensure that lower income residents are not left to bear the brunt of natural gas infrastructure costs.

E-4: Increase the Amount of Electricity Produced from Local Resources

- E-4.2 and E-4.4 – The city can support grid reliability and resiliency by siting solar energy generation and battery storage near multi-family housing and near community centers. When paired with solar photovoltaics, SMUD affirms that battery storage can store energy for nighttime use, during power outages, power shut off events, and during peak events, which reduces energy costs. Power shut off events and power outages are increasingly common under a warmer climate due to wildfire days and extreme precipitation events.

E-5: Support Infill Growth

- Sac Metro Air District recommends greater synergy between the 2040 General Plan and the CAAP for infill growth policies and measures. Action E-5.2 enables the development of 29,000 new multi-family dwelling units that are within ½ mile of public transit and Action E-5.3 enables the development of 8,700 new affordable housing types within ¼ mile of public transit whereas the 2040 General Plan policy LUP-4.1 aims to increase residential and commercial development intensity within ¼ mile of planned and existing public transit. As noted in Sac Metro Air District's Public Review Draft 2040 General Plan comment letter, we support the more vigorous density metric to promote growth around transit stations.

[3] City of Rancho Cordova, Final Draft Climate Action and Adaptation Plan, July 2023, https://www.cityofranchocordova.org/residents/community-topics/climate-action-plan

- We suggest directly referencing the corresponding General Plan policies that achieve the targets for Measure E-5.

TR-1: Improve Active Transportation Infrastructure

- Combining Key Performance Indicator B and E and indicating if there are plans to update the 2016 Bicycle Master Plan in the near term and combining Key Performance Indicator C, D, and F and indicating if there are plans to update the 2006 Pedestrian Master Plan in the near term would provide more clarity on Measure TR-1.
- TR-1.2 – In coordination with the Urban Forestry team in the city's Public Works department, the city should develop an objective design standard for tree shade along roadways. Tree shade would enhance the pedestrian network by making sidewalks and other walking paths more accessible and comfortable for a greater number of pedestrians. Pedestrian network and roadway improvement projects should include cool pavements with an albedo of 0.30 or greater and the city should prioritize improvements in disadvantaged neighborhoods most impacted by urban heat.
- TR-1.3 and 1.4 – We recommend greater synergy between the 2040 General Plan and the CAAP for transportation policies and measures related to pedestrian safety. The study described in Action TR-1.3 should include pedestrian and bicyclist safety which is a major barrier to active transportation modal shifts. The city's General Plan states that single-occupancy vehicles are the dominant mode of transportation in Sacramento. One way to decrease single-occupancy vehicle trips is to make the roads safer for pedestrians and bicyclists.

TR-2: Support Public Transit Improvements

- TR-2.3 – A map showing the priority transit corridors would provide helpful context for TR-2.3. Encouraging SacRT to also provide reduced transit fares would incentivize behavioral shifts to transit.
- TR-2.6 and TR-2.7 – Building on TR-3.5, these actions can support electric car sharing and shared rideables through new mobility hubs that also offer shading through increased tree canopy or through solar shade structures. Solar shade structures have the added benefit of allowing for EV charging. The city should continue to prioritize mobility hubs in lower income neighborhoods that do not have access to EV charging infrastructure.
- TR-2.10 – We recommend adding heat mitigation such as increased tree shading, solar arrays, and/or the installation of cool pavements and cool walls at transit stops to improve rider comfort and accessibility.

TR-3: Achieve Zero Emission Vehicle Adoption Rates

- Couple EV charging infrastructure with solar canopies at parking lots for increased shading and to offset EV charging costs.
- TR-3.5 – Consider adding hydrogen fuel cell vehicles and related infrastructure to new mobility hub pilot projects.
- Sac Metro Air District commends the General Plan policy LUP 4.13 Future-Ready Gas Stations and recommends incorporating this policy language in Action TR-3.6 to streamline the EV infrastructure permit process.
- Action TR-3.10 provides an opportunity to educate the public about vandalism of EV charging infrastructure and consequences.
- Sac Metro Air District still recommends including measures to address the electrification of medium- and heavy-duty vehicles.

W-1: Work to Reduce Organic Waste Disposal

- CAAP readers may be interested in learning what progress the city has made in achieving Key Performance Indicators C and D to adopt an edible food recovery ordinance and prepare an edible food recovery plan by 2025. These two indicators could be combined.
- W-1.4 – Consider expanding this food waste diversion program to multi-family residential customers since multi-family properties are also required to divert their organic waste under SB 1383.

WW-1: Reduce Water Utility Emissions

- Sac Metro Air District still recommends adding per capita water use as a Key Performance Indicator to better monitor progress in achieving statewide water usage targets.

CS-1: Increase Urban Tree Canopy Cover

- In addition to implementing the Urban Forest Plan, the city should also consider the implementation of the Parks Plan 2040 and aim to improve public parks with limited tree canopy cover in disadvantaged areas such as North and South Sacramento. The city could also assess the benefits of adding green infrastructure, parks, and open space in flood prone and repetitive loss areas of the city.
- As noted in the 2040 General Plan under ERC-3.10 Parking Lot Shading, the city aims to review and amend the Parking Lot Shading Design and Maintenance Guidelines and Parking Lot Shading Ordinance. Consider implementing a parking lot retrofit program that incentivizes tree shading enhancements to ensure additional shading at existing parking lots.

Chapter 8 – Implementation and Monitoring

- Sac Metro Air District recommends tracking funding in the city's budget to ensure climate action measures are sufficiently funded, and beyond tracking, we recommend pursuing a dedicated revenue source such as the City of Rancho Cordova's proposed utility user tax on natural gas referenced above.

Chapter 9 – Community Action and Sustainability

- Wherever possible, add links to local and State of California funding opportunities that can reduce the cost of making more sustainable purchases for Sacramento residents, property owners, businesses, and employers. For example, to reduce the cost of buying or leasing an EV, the city could link to the Clean Cars 4 All program.

Chapter 10 – Municipal GHG Reduction Measures

- In reference to MM-5.4, Sac Metro Air District still recommends adopting a strategy to replace artificial turf with natural turf and instead water play fields with recycled water from Regional San using smart irrigation control devices.

Sac Metro Air District thanks the City of Sacramento for developing a robust plan to mitigate greenhouse gas emissions and address future and current impacts of climate change on our region. We appreciate the inclusion of specific climate equity strategies that give special attention to lower income and disadvantaged communities. A general recommendation would be to better integrate the measures in the CAAP with policies from other critical city planning documents such as the 2040 General plan, the Urban Forest Plan, the Parks Plan 2040, and the Transportation Priorities Plan.

If you have questions regarding these comments, please contact Brianna Moland, Climate Coordinator, at bmoland@airquality.org or (916) 317-0821.

Sincerely,

Brianna Moland

Brianna Moland
Climate Coordinator, CEQA and Land Use Section
Sac Metro Air District

cc: Paul Philley, Program Supervisor
Raef Porter, Program Manager
Jaime Lemus, Division Manager
Molly Wright, Air Quality Planner/Analyst

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September 22, 2023

City of Sacramento
Community Development Department
Greg Sandlund, Planning Director
300 Richards Boulevard, 3rd Floor
Sacramento, CA 95511

SUBJECT: Public Review Draft of the Sacramento 2040 General Plan and Climate Action and Adaptation Plan (CAAP)

The Sacramento Regional Transit District (SacRT) values the opportunity to review and provide input on the City of Sacramento's (City) draft 2040 General Plan. SacRT appreciates the City's vision to ensure sustainable and equitable growth in the community and believes that aligning goals between all agencies throughout the City is a crucial part to successful planning and future development.

As the region's largest transit service provider, SacRT plays an important role in serving the existing community, but also is a critical piece to supporting new growth and development. As such, SacRT staff has reviewed the City's Draft 2040 General Plan and CAAP, and offers the following support, thoughts, and suggestions.

Sustainability and Equity

SacRT supports the City's recent initiatives to demonstrate its commitment to sustainability and equity. SacRT appreciates the indicators (mode share, vehicle miles traveled (VMT) per capita, infill development in corridors and centers) as they support public transit use over single-occupant vehicle use, as well as laying an appropriate foundation for reliable, high-frequency transit.

Land Use and Placemaking

Map LUP-4: SacRT would like to suggest that Cosumnes River Boulevard be represented as a corridor in the concept diagram, as it currently provides an east-west connection between urban centers and will continue to grow with the expansion of the Delta Shores community. Additionally, the corridor is a major arterial that serves the Morrison Creek light rail station and is expected to be an important part of future connectivity between nearby bus routes and light rail service.

Policy LUP-4.1: SacRT appreciates the policy on Transit-Supportive Development and suggests stronger language be used to effectively describe the City's continued support; replacing "The City shall *encourage*" with "The City shall *emphasize*".

Policies LUP-4.10, and LUP-4.11: SacRT supports the language in both policies, particularly about reducing the need for onsite parking, and to encourage shared parking areas. Additionally, the mention to minimize the number of driveways and curb cuts is beneficial to transit operations, since they can sometimes become obstacles with respect to bus-pedestrian conflicts, and bus-automobile conflicts.

Mobility

Map M-1: The future Green Line light rail alignment is included in the map as a high-frequency transit service; however, SacRT does not currently operate high-frequency transit service from downtown Sacramento to the Sacramento International Airport. If this map is intended to depict *future* high-frequency transit, in addition to existing high-frequency transit, then SacRT suggests adding that distinguishing language to the map legend for clarity.

Map M-3: The map is somewhat misleading, as it depicts the Gold Line and Blue Line light rail routes as "candidates" for high-frequency transit; however, they are already high-frequency transit corridors, not necessarily candidates for that level of service. Additionally, SacRT refers to "high-frequency"

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service as fixed-route service offered at headways of 15 minutes or better. As such, it may be helpful to better define what "high frequency" service means.

Policy M-1.5: Efficient transit operations is highly dependent on street design and infrastructure; therefore, SacRT believes that 'public transit' should also be included as a consideration in Street Design Standards, at least for the design of arterial streets.

Policy M-1.21: SacRT suggests adding additional language to this policy, specifically that 'high-density residential' should also be a consideration in planning for the extension of frequent transit service, rather than just specifically stating "areas with concentrated employment". While employment centers may justify the need for service expansion, high-density residential is an equally important consideration.

Policy M-1.26: SacRT recommends that this policy be strengthened with additional language reflecting all bus stop design criteria, rather than just specifically stating "bus shelter design". SacRT has an extensive Bus Stop Design Guidelines document, with bus shelters being just one of many design elements that encourage transit use. ADA-compliance, bus stop placement, and passenger safety are other elements that the City should not only encourage, but collaborate and assist with, when feasible.

Policy M-2.8: SacRT suggests additional language be added to this policy, that reflects the City to not only "encourage" microtransit service efforts, but also to '*support and assist'* with these efforts, when feasible.

Policy M-2.9: Suggest adding "spare the air" days, or clean air days, as events for which agencies should promote and encourage the use of transit and active modes of transportation.

Policies M-2.16, and 2.17: SacRT supports these policies that will plan and manage parking strategies, including seeking options prior to allowing the construction of new parking facilities, and to implement parking maximums along established transit corridors. These strategies are useful ways which may help support the shift from single-occupant vehicle use to transit use.

Map M-4: Many regional transit providers offer commuter routes that serve downtown Sacramento, such as Roseville Transit, El Dorado Transit, and Yolobus; however, downtown Sacramento is not reflected as having *any* regional bus stops in the Regional Connectivity map. As such, SacRT recommends that the map be revised to reflect the Downtown core as having regional connectivity/stops.

Policy M-A.8: The Bus Rapid Transit policy is specific to Stockton Boulevard, which is logical due to recent studies and efforts for rapid transit planning along the corridor; however, SacRT has completed a high-level conceptual planning study that identifies several BRT corridors besides Stockton Boulevard. SacRT suggests additional language to reflect that a High-Capacity Bus Study exists. Although Stockton Boulevard is the priority corridor that is near-ready for implementation, it should also be clear that others have been studied and identified as "BRT candidates."

<u>Climate Action and Adaptation Plan (CAAP)</u>
The initiatives included in the City's CAAP demonstrate similar viewpoints that SacRT has about ways to plan for and address global and regional climate change. Like the City, SacRT is also committed to coordinated actions to reduce greenhouse gas (GHG) emissions to help mitigate the extent of increased climate change and its effects, such as severe extreme heat events, urban heat island effect, flooding, droughts, and wildfires. As such, SacRT supports the City's efforts to build climate resilience effectively and equitably in the Sacramento community, with emphasis on the following planned measures and implementation actions included in the CAAP:

Measure TR-2: SacRT is particularly interested in partnering with the City to implement the actions necessary to achieve this measure. SacRT agrees with the intent, specifically efforts to plan for at least an 11 percent transit mode share by 2030, given that sufficient funding can be obtained to implement the essential infrastructure. Although this measure is very optimistic, SacRT believes that it can be achievable through strong collaboration with the City and with substantial funding support.

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Transit infrastructure improvements include projects such as transit lanes, signal priority, parking maximums, and other efforts that are needed to make public transit more accessible, timely and attractive.

Action TR-2.13: SacRT considers this action to investigate and lobby for the development of a TNC user tax an interesting concept. A tax that would put a small fee on the use of Uber, Lyft, and others to generate funds to pay for transit and transportation infrastructure and related programs is an attractive notion that would ultimately benefit the entire region if implemented.

Measure E-5: This measure to prioritize infill development in the City corresponds with SacRT's own vision and plans for transit-oriented development (TOD). As the region's largest transit provider, SacRT is always enthusiastic to partner with the City on TOD opportunities and agrees that mixed-use developments and high-density housing to infill existing urban areas in proximity to transit service is a critical method to reduce VMT and support our shared climate goals.

Action E-5.2: SacRT supports this plan to enable development of 29,000 new multi-unit dwellings that are public transit accessible (within ½ mile of public transit) by 2040 through continuing the City's ministerial/staff-level review of infill housing, reduced fees, and identification of local funding sources; however, SacRT would like to see the City enforce some types of transit-supportive conditions of approval. Although the goal of the ministerial review and approval process is intended to be simpler and more timely than other project approvals, SacRT believes that conditioning a project to provide access to nearby bus stops and light rail stations is yet another way to make transit easier and attractive to use, which benefits all parties involved, as well as supports the region's larger climate goal to reduce VMT and GHG.

Action E-5.3: SacRT supports this plan to enable the development of 8,700 new affordable by design housing types by 2040 within ¼ mile of transit by updating the City code to allow and reduce barriers to these housing types. Since many of SacRT riders are low-income, most are also transit-dependent; therefore, being within a closer proximity to transit service is vital. SacRT agrees with this proposed update to the City Code, as it will be essential for these developments to come to fruition.

Thank you again for the opportunity to review and provide comments on the Draft 2040 General Plan and Climate Action and Adaptation Plan. SacRT values the partnership with the City of Sacramento and looks forward to continued collaboration in advancing these plans.

Sincerely,

Sarah Poe

Sarah Poe
Planner, SacRT

cc. Kevin Schroder, Senior Planner, SacRT
Anthony Adams, Director of Planning & Grants, SacRT

SIERRA CLUB
SACRAMENTO GROUP

sierraclubsacramento@gmail.com

1722 J Street #226
Sacramento, CA 95811

August 21, 2023

Mayor Steinberg and Sacramento City Councilmembers
Sacramento City Hall
915 I Street, Sacramento CA, 95814

Sent via email to Darrell Steinberg, Mai Vang, Caity Maple, Katie Valenzuela, Karina Talamantes, Lisa Kaplan, Rick Jennings, Sean Loloee, and Eric Guerra

RE: Tue, August 22 City Council Meeting, Agenda Item 18: Climate Action and Adaptation Plan

Dear Mayor and City Councilmembers,

On behalf of Sierra Club Sacramento, we would like to thank the city for releasing the draft Climate Action and Adaptation Plan. This plan is instrumental in guiding the city's climate action in the coming decades.

Many local organizations have been advocating for the city to plan and implement strong climate action policies and programs since the Mayors' Commission on Climate Change was established in 2018. In the past five years, there has been some progress in reducing sprawl, advancing active and mass transit, and improving community resilience. Sacramento needs to escalate these efforts, in order to meet our carbon emission reduction goals as quickly as feasible. Every emission reduction and improvement in residents' quality of life now will save Sacramento money - and more importantly - our health, in the medium and long term.

In this letter, we will:

A. Outline three action areas that we see as priorities, as they are directly linked to health and housing security in Sacramento,
B. Ask the City Council to make four requests of staff at the August 22 council meeting, and
C. Echo important CAAP and General Plan recommendations and feedback from other local advocacy organizations.

A. There are three action areas that Sierra Club Sacramento would like to uplift as priorities, as we see this as integral to improving public health:
    1. **Existing tree canopy.** It is important to plant new trees, but it is even more important to make sure we don't lose any more of Sacramento's existing canopy.
    2. **Building electrification retrofits**. Retrofitting buildings is expensive, and compounding social and economic hardships will make this difficult for a majority of homeowners. It could also negatively impact renters. The city needs to spend considerable time and funds to make sure this transition is equitable. We support 350 Sacramento's recommendations on building electrification and retrofits.
    3. **Adaptation.** Increasingly severe weather is already impacting Sacramento, and especially our most vulnerable communities. The City needs to have a stronger plan for adaptation. We urge the city to put more emphasis (and detail) on its Public Health section, as well as provide more implementation details for the Adaptation measures.

B. In addition, Sierra Club Sacramento asks that the City Council direct staff to:
    1. Present tangible funding and financing options for the CAAP. This should include the potential amount of funding available per option and other metrics that will allow the Council to make decisions about pursuing financing options sooner rather than later. Without funding, almost all of the CAAP measures cannot be implemented or even planned. For example, page 64 and the following pages outline strategy plans for each section. Here would be a good place to include the expected cost of each strategy as well as the source of funding.

    2. Add more implementation details and milestones to outlined actions. While we are sympathetic to limiting staff time spent on details/timelines that might not come to fruition, these actions may never come to fruition in a meaningful way with vague goals like "support" and "encourage". Without any meaningful detail, too many measures could be considered successes without anything ever happening (i.e. "*Support* SMUD in the implementation of the 2030 Zero Carbon Plan, *Encourage* SacRT to provide…transit, "*Consider* adopting, if needed, an ordinance that alights with AB 827). An example of implementation detail could be to work with SMUD on identifying large scale solar sites within the City to facilitate local production of clean energy.

    3. Include more measures that boost accountability and institutionalize climate action within the City. Sacramento should align all planning policies and regulations with the CAAP goals and priorities. While city staff have stated this is

the case, we haven't seen many updates on the City's own efforts to apply a climate lens to programs and projects, as well as reduce emissions from City buildings and fleets. What happened to the directive to purchase SMUD Greenergy for the city, or retrofit gas appliances in city buildings? There are excellent examples of City Leadership actions in Oakland's Equitable Climate Action Plan (p. 108)

4. Make this or future CAAP updates more user-friendly and digestible. Due to the magnitude, complexity, and time scale of climate change, it can be challenging to make the issue personal to the reader. The CAAP should strive to allow readers to feel connected to the solutions being implemented within the city of Sacramento. An example of this can be found on page 17 of Oakland's Equitable Climate Action Plan. Including related maps of the city allows readers to identify with an issue and engage on a deeper level with the solutions. In addition to relatability, this and future CAAPs should aim to present the necessary information as efficiently as possible. Implementing a standardized presentation of each topic allows for easier comprehension of the material.

C. We would also like to support the recommendations from organizations we often work within the Sacramento region. These organizations have dedicated volunteers with a keen understanding of the built environment, transportation, carbon sequestration, and other topics covered in the CAAP and General Plan:
    - We support the recommendations of land use from Friends of the Swanson Hawk:
        - Maintain the City's commitment to the current boundary in North Natomas,
        - Protect the Natomas Basin Conservation Plan conservation strategy and Natomas Basin Conservancy, and
        - Support the County Urban Services Boundary (USB) and County farmland and open space protection policies.
    - We support ECOS's comments on the CAAP. Some recommendations of note:
        - Job creation opportunities could be addressed more directly,
        - Ensure lower income/multi-tenant dwellings get the ability to transition from gas to electric utilities,
        - The need for incentives for landlords to upgrade rental units to electricity, and

    - The need for discussion of biodiversity and habitat management within the plan.
- We support SABA's comments on the CAAP. Some recommendations of note:
    - Identify higher targets for mode share and
    - The CAAP should explicitly include strategies for speed reduction, roadway design, additional tree canopy, and re-design with Vision Zero and "complete street" requirements.
- We support 350 Sacramento's comments on the CAAP. Some recommendations of note:
    - Recommendations on strengthening efforts to retrofit houses in low-income communities and
    - Recommendations on improving public health and adaptation measures.

Sincerely,

Kate Wilkins, Vice-Chair
Sierra Club, Sacramento Group, Mother Lode Chapter

From: Sac 2040 Gpu
To: Climate Action & Adaptation Plan
Subject: FW: General Plan comments
Date: Monday, August 21, 2023 11:27:10 AM
Attachments: image001.png

From: Smith, Angie (CSSD WDS) [redacted]
Sent: Monday, August 21, 2023 11:17 AM
To: Sac 2040 Gpu <sac2040gpu@cityofsacramento.org>
Subject: General Plan comments

Hello,

Since I live in District which doesn't currently have a representative, I'm sending my comments via email.

I support the importance of Sacramento's Urban Forest and our established neighborhoods – in the Climate Action and Adaptation Plan, the 2040 General Plan, and all the accompanying documents. I ask the City Council and city staff to keep the importance of the Urban Forest and our neighborhoods at the forefront. There are virtually no provisions in GP 2040 or the CAAP to protect our existing, mature tree canopy - 80% of which is on private property, much of it in residential front and back yards slated for upzoning and increased density.

I support policies that will actually create more affordable housing, especially for lower income households, not false claims that affordable housing will result from more Accessory Dwelling Units (ADUs) or densification of existing single-family neighborhoods. One meaningful action the city can take is to prohibit non-owner-occupied housing, including ADUs, from being used as short-term rentals, which are defacto hotel rooms and reduce our housing stock.

I also support policies that will create actual solutions for the unhoused. I'm currently embarrassed with our city. It feels as though the unhoused has more rights than taxpayers and local businesses. The current situation is unsafe, not healthy and is not sustainable. Do we want to be like San Francisco, Seattle and Portland whose cities are dying due to tolerance of homeless and crime,

human faeces and unsafe interactions.

Angie Smith, *PMP®, CSPO, ITIL 4*
NA Senior Services Designer
[redacted]:

July 29, 2022
To: City of Sacramento Planning Dept.
From: Muriel Strand, P.E.
Re: City of Sacramento Draft Climate Action & Adaptation Plan (CAAP)

I fear I don't share staff's confidence that the standard plan of grafting our fossil fuel lifestyles onto PVs, windmills, and batteries will work. Far preferable would be conservation first, in particular fundamental reform of our fossil systems and infrastructure. **Wisdom bids us reposition our civilization onto biology and ecology.** The potential reductions in energy use and GHG emissions from such basic fundamental change far exceed reductions from just more technology. And biological processes are simpler and less expensive.

The idea of converting everything to electric power is not based on a robust analysis of the required resources. Current mining and refining technologies for key metals and minerals (including those required for manufacturing PVs, windmills, and batteries) require fossil fuels for key processes: https://www.youtube.com/watch?v=TFyTSiCXWEE

How many square feet of PV area and how much electrical wiring will be required to replace all fossil fuel use in California or the USA? Or how many windmills each of which requires a large concrete foundation? The Oak Flat controversy is one example of the dubious 'side effects' of this dream: https://www.newyorker.com/magazine/2022/07/11/mine-field

While the electrification plan may be possible for California, it just does not scale nationally, let alone globally. So it's not really such wonderful leadership. It's also a solution that's not really affordable for many essential workers or the homeless, nor for the climate refugees we can expect to arrive in the coming years. The stated commitment in the Draft CAAP to equity for under-resourced communities is not at all consistent with the city's current actual treatment of homeless Sacramentans. How will this change in the implementation of the Final CAAP?

Thus, I have spent considerable time attempting to discern and outline a vision for fundamental and radical change that is also more practical and realistic. One small example of an easy way to begin practicing such changes would be to ban first leafblowers and then all landscaping equipment that use engines or motors to accomplish tasks that are well within human muscular capability: http://motherearthhome.blogspot.com/

Sacramentans who would prefer to adjust their lifestyles to be based on biological and ecological foundation, rather than on the dubious design of electrifying everything, should be supported in following a natural and traditional path. The CAAP should include a complete set of strategies for them, not just the reflexive approach of BAU-electrified.

The city's Draft CAAP refers to the 2017 scoping plan developed by the California Air Resources Board, pursuant to AB32. As it happens, I have been following and commenting on the series of workshops organized to gather public input on various aspects of the 2022 scoping

plan on how California will achieve the netzero goals approved by the Legislature. Taken together, my comments describe an alternative vision of a biological/ecological infrastructure and economy.

Scoping plan workshop information can be accessed via:
https://ww2.arb.ca.gov/our-work/programs/ab-32-climate-change-scoping-plan/scoping-plan-meetings-workshops?utm_medium=email&utm_source=govdelivery

My scoping plan comments, which address the same issues as the Draft CAAP, are almost all available via these links:
https://www.arb.ca.gov/lists/com-attach/8-sp22-publichealth-ws-WyhTNlI8WXoHaFQ6.pdf

https://ww2.arb.ca.gov/applications/public-comments?p=comm&s=bccommlog&l=22spcarbonneutrality Comment #1

https://www.arb.ca.gov/lists/com-attach/511-scopingplan2022-VCcAZQRqV3QFalQ6.pdf

I shared much of the information in these comments with the Mayors' Commission on Climate Change, but the result indicated that my information was ignored. Back in March, I shared with Supervisors four highlights related to the more fundamental perspective I recommend:

1. In the late 1990s, I calculated that **fossil fuel energy is very cheap.** It takes about 100 hours for a healthy adult to generate, such as on a bicycle generator, the amount of energy available from a gallon of gasoline. Comparing the minimum wage to the price at the pump, that's a huge cost ratio, and very different than the biological conditions we are evolved to live in.

2. **Fossil fuel energy is physical energy. Our physical needs are: clean air and water, healthy food, cooking, comfy shelter, and plenty of sleep and exercise. We would be wise to plan ways to meet those needs without fossil fuels as soon as possible.** That means substituting humanpower and manual tools for engines and motors as soon and as much as possible.

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

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

Lastly, a few specific comments on some of the proposals in the Draft CAAP.

Active transportation measures face the challenge of unfriendly price signals, because fossil energy is so very much cheaper than human power. In my youth, I rode buses and BART frequently; nowadays I confront an unfamiliar system where the lightrail ticket machines are often unreliable on those few occasions I ride. I've always bicycled, however I notice that bike parking often seems to have been installed without any consultation of actual cyclists. And 'complete streets' should entail NO NEW PAVEMENT!! Every scrap of pavement is land that's unavailable for urban farming and carbon sequestration. Similarly, the Draft CAAP's picture of xeriscaping with lots of rocks is not the way to support urban farming.

It would be great for everyone to have 1/4 mile access to green space. However I've noted that there is at least one place where the street layout is designed to require several miles of travel for a 1/4 mile distance as the crow flies. I infer that planners wanted to separate the rich from the poor.

I'm skeptical that indoor cooking with gas is as hazardous as portrayed by RMI and others. Even more unfortunate is the absence of any mention of solar cooking which has been advocated for many years by Sacramento's own Solar Cookers International: https://www.solarcookers.org/

July 27, 2023

To: City of Sacramento Planning Dept.

From: Muriel Strand, P.E.

Re: Sacramento's Climate Action & Adaptation Plan (CAAP)

Reviewing the CAAP at http://www.cityofsacramento.org/-/media/Corporate/Files/CDD/Planning/Major-Projects/generalPlan/Climate-Action-and-Adaptation-Plan---April-28--2023.pdf?la=en
I see that my comments of July 29, 2022, were completely ignored.

It's unfortunate that the city's plan will be derailed by reality. To reiterate, adding new information:

"The idea of converting everything to electric power is not based on a robust analysis of the required resources. Current mining and refining technologies for key metals and minerals (including those required for manufacturing PVs, windmills, and batteries) require fossil fuels for key processes:" https://www.simonmichaux.com/

Unfortunately, we cannot graft our fossil fuel lifestyles onto PVs, windmills and batteries. These nonrenewable harvesters of renewable energy require fossil fuels for mining and refining of the metals and mineral needed to manufacture them. Plus which all mining and all pavement reduce the carrying capacity of the planet. And resources are limited; the electrification plan just does not scale nationally let alone globally. It's fake adaptation.

The giant fusion reactor in the sky has powered the whole planet for several billion years until the addition of fossil energy a few centuries ago. If we are truly sapiens we can ditch our fossil energy addiction and live within our ecological means. And we can decide to do it sooner, the easy way, or wait until catastrophe forces that change.

1. We do not need "mobility," we need access.

2. We need a procedure for permitting composting privies. Putting poop in the water is very very bad engineering.

3. We need to focus on urban organic farming because conventional farming takes too much energy and trucking food long distances takes too much energy. Many jobs can be created in this sector, and public health will be improved.

4. All new construction and all renovations should be required to incorporate passive solar design as much as possible, to reduce energy demand to the greatest extent.

Sustainable Investment Means Energy Independence From Fossil Fuels
https://www.researchgate.net/publication/256048802_Sustainable_Investment_Means_Energy_Independence_From_Fossil_Fuels

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

The Farm Bill IS Climate Legislation
https://www.researchgate.net/publication/350327927_The_Farm_Bill_IS_Climate_Change_Legislation

THIRD ACT
SACRAMENTO

August 21, 2023

To: Sent via email to Mayor Darrell Steinberg, Mai Vang, Caity Maple, Katie Valenzuela, Karina Talamantes, Lisa Kaplan, Rick Jennings, Sean Loloee, and Eric Guerra, and the City Clerk

RE: Tue, August 22 City Council Meeting, Agenda Item 18: Climate Action and Adaptation Plan

Dear Mayor and Councilmembers,

Third Act Sacramento is a working group of the national Third Act organization. Third Act comprises people over 60 years of age—Experienced Americans—and pursues a two-part mission to stabilize our climate and secure our democracy. We are commenting here in our capacity as Elders concerned about the future we are leaving for younger people and future generations.

We appreciate the effort put into creating the Climate Action and Adaptation Plan (CAAP). It is a critical document for moving forward locally on authentic climate action. While we applaud you for the possibilities this CAAP provides, we have many concerns and feel the document can be strengthened considerably.

Science of Climate Change (Chapter 1)

While the basic science of climate change is explained in the CAAP, the lack of urgency around these changes is sadly lacking. Some points that need to be included:

- **This is the critical decade for climate action**. We can still curb anthropogenic greenhouse gas emissions to a large extent, but after about 2030 emissions will be baked in and we will no longer be able to control global heating. The CAAP goal of carbon neutrality by 2045, and especially the measures that are planned to go into effect after 2030, are basically unserious.
- **Tipping points**. We must act as quickly as humanly possible to reduce greenhouse gas emissions (GHGs) if we want to avoid tipping points that would accelerate climate change beyond our control. Climate tipping points are thresholds that, when crossed, lead to large and often irreversible changes in the climate system. Many of the major tipping points (melting permafrost, unstable jetstream, etc) have already been activated and this window for climate action is closing quickly. There is no mention of this in the CAAP.

- **Carbon budget**. The CAAP also neglects to mention that the worldwide remaining carbon budget is 250 gigatons of CO2 to remain within 1.5° change as recommended by the Paris Accords. Globally, we are releasing about 54 gigatons per year, and this is accelerating. Simple math shows that we have about 5–7 years to achieve carbon neutrality in order to remain below the 1.5° threshold. Above that threshold, we trigger some very serious changes.

Major areas of concern

Lack of urgency. While the word *urgency* is used in the CAAP numerous times and the City passed a Climate Emergency Resolution in 2020, nothing in the CAAP demonstrates a real understanding of the urgency embodied in this crisis. In fact, the CAAP does not even achieve carbon neutrality by 2045! The speed and power of recent climate events are astounding even the climate scientists studying them. What we are seeing today was predicted to happen in 30 or 40 years. Our community is at great risk from both known and unknown dangers of an unstable climate, including food and water insecurity, flooding, heat beyond human tolerance, conflict, health impacts, and so many other threats, including unexpected consequences we haven't considered. Every City department, every decision, and all spending priorities MUST be done through the lens of the climate crisis. The final document must not be approved without a clarion call to urgency and a restructuring of City actions to center around climate, which is the biggest challenge facing our city and world.

Additional major concerns:

- **The City's Climate Action and Sustainability Office (OCAS) is unacceptably understaffed**. Our primary concern is that staffing is inadequate to accomplish the climate actions listed in the CAAP. Hiring new staff is the first and most important action the City must take. We need staff to plan and implement the CAAP measures, as well as grant writers to get the necessary funds for these actions. The idea that Civic Spark fellows would be able to fill in for staff is misguided. Although Civic Spark participants are amazingly talented, the City needs full-time staff for stability, continuity, and to build institutional memory. We recommend a minimum of 6 more staff people, but this number is very clearly on the low side for the work that needs to be done. (Appendix D Page 3)
- **No funding for CAAP measures**. The CAAP is currently unfunded, which means it is useless. Without funding no climate action will happen. The fact that funding for the measures has not been a priority shows a lack of commitment by the Council and CAAP authors. Why is there an unambitious plan to fund only $600 million of the $3.2 billion needed? Elected leaders have a responsibility to present the risks, and do their best to come up with solutions before crises happen. They must make what may be difficult decisions to keep residents safe and well protected, even if it means proposing unwelcomed taxes, fees, ordinances, and regulations (such as, banning dangerous equipment such as gas appliances which cause asthma, cancer, and heart diseases). It will take dedicated grant writers to find the money to accomplish our climate goals. These grant writers should be hired in addition to

the new OCAS staff we recommend for planning and implementation. (Appendix D Page 17). It will take an all-of-the- above strategy to secure enough funding, including many of the ideas listed in Appendix D and those that have succeeded in other cities, such as Portland's Green Energy Fund, and others (see funding sources provided by the Climate Coalition).

- **Old data.** In order to effectively plan for the future, we need to use the latest scientific data. As mentioned earlier, climate scientists are gobsmacked by current climate conditions, record-breaking weather, and unprecedented tragedies. The 2045 carbon zero target was set by the State in 2006…17 years ago! The goals and data from that far back are no longer relevant, which calls into question the relevance of this CAAP and its goals. With the speed at which the climate is changing, 2045 is a ridiculous goal, outdated before the CAAP is even approved. We should be doing everything possible to achieve carbon zero within this decade.
- **Unrealistic expectations** and **unambitious goals**. These issues occur throughout the CAAP, but we will highlight only one example in the Active Transportation appendix: The CAAP cites several cities with a higher percentage of bicycle use than Sacramento, and then implies that by simply adding bike lanes we will achieve the same increases, although the actual CAAP goals are incredibly low. However, this section neglects to mention that most of those cities are college towns, that they have prioritized bike travel, and that they have invested heavily in improved infrastructure, education, and have made car travel less attractive through a number of measures not included in our CAAP. (Appendix C Page 20 Action TR-1.1)
- **Serious design problem for CAAP comments**. In order to comment on the CAAP, people go to Station 11, which contains two graphics. At this point most people will stop, thinking this is the relevant CAAP information. In order to access the full CAAP, you must click on a tiny, basically hidden, box at the bottom of the second graphic. How many people who were very concerned about climate change and wanted to make comments were deterred from doing so by the poor design of the website?
- **Taking credit for SMUD actions**. The CAAP is depending heavily on the pioneering work SMUD is doing to reach Zero Carbon by 2030. We need the City to implement its own climate actions, including decarbonizing buildings and vehicles, installing solar panels on parking lots and buildings, incentivizing active transportation and public transport, planting trees, and so much more. Do not count SMUD's ghg emissions as the City's own!

Other suggestions

While our goal in this letter is to identify problems and offer primarily high-level suggestions to improve the CAAP, we would like to spotlight a few topics and suggestions we feel are especially important and need to be strengthened in this document.

Lack of commitment to Land Use changes. Land use is central to reducing emissions. Instead of embracing opportunities to create land uses that will result in lowered emission, the City is passively following past practices that have proven unsuccessful. The City must aggressively pursue change

through incentives and regulation, rather than the current practice of relying on the private sector to voluntarily step in. The measure as written isn't enforceable, language is vague, and the City seems reluctant to use its regulatory power. (Appendix C Page 17 Measure E-5)

Food insecurity in the Farm-to-Fork Capital. While Sacramento takes pride in being the Farm-to-Fork Capital, we face severe reductions in crop productivity due to climate change that will not be improved by the slow pace of GHG reductions recommended in this CAAP.

Strengthen local ecosystems. Sacramento lost about 1000 trees in the January 2023 storm, but few were native, according to the Sacramento Tree Foundation. Native trees and plants are adapted to our area and have critical relationships with pollinators, birds, insects, and other local species in this ecosystem. We must strengthen our local web of life by planting native trees and plants, rather than nonnatives. The current goal of increasing tree cover from 20.5% to 25% is sadly unambitious. We will be losing trees to climate change—heat, insect pests, strong winds, floods, drought, etc—and have to plant even more to achieve that level. Trees provide many co-benefits, including shade and cooling, carbon sequestration, soil stability, bird and insect homes/refuges, mental health benefits, wind protection, and food. We can do much better than 25%. Hire more tree planters out of the large population of unemployed and underemployed in our city. Engage the community in planting. Trees are much better at pulling carbon out of the atmosphere than the current costly and ineffective Carbon Capture & Storage options. The goal should be highly ambitious, like planting one fast-growing native tree per person per year for 6 years. We recommend a baseline canopy goal of 35% by 2030 and 45% by 2045.

Ban single-use plastic. Sacramento can initiate an ordinance to stop single use plastics, including styrofoam. Plastics are an insidious material. They do not decompose, can offgas GHG's such as methane (84 times more powerful than carbon dioxide), ethylene, and toxics for millenia, and are destroying our oceans and lands. Most importantly, plastics are the new salvation for the fossil fuel industry since most plastic is made from petrochemicals. The use of plastic requires a continuation of drilling, fracking, and pumping, rather than what is necessary for a healthy planet: ending the era of fossil fuels.

Conservation. There is still much that can be done to reduce emissions through conservation. While individual actions are negligible in combatting climate change, the collective action of many Sacramentans can be extremely effective. The City can do much more with incentives, regulation, and simply educating the public about the myriad threats from climate change and potential solutions. We can be creative about solutions—there is no need for most people to travel to an office if they can work from home (and those empty offices can become much-needed affordable housing), there is no need for every driver to have a car (even if it is an EV), we can dry clothes in the sun, and so much more. Re-imaging how things are done in the City will require creativity, cooperation, lower consumption, and new models for living a good life.

Decisionmakers must be courageous, do the right thing. For this CAAP to be effective, it is imperative that decisionmakers center the climate crisis in all decisions. This takes vision, long-term thinking, problem-solving, creativity, and courage. All growth must be infill, no new gas stations should be permitted, gas-powered lawn equipment must be prohibited (along with a buyout or trade program), transit must be reliable and affordable for the lowest incomes or make it free. We can no longer kick the can down the road to the next generation or administration (even if it means hurting the bottom line of big political donors).

We support CAAP comments/suggestions from the following

We strongly support and wish to amplify the thoughtful recommendations provided by other local organizations with strong expertise in a number of the topics covered in the CAAP. These include 350 Sacramento, SABA, ECOS, Citizens Climate Lobby, Sierra Club Sacramento, Sacramento Climate Coalition, and SacEV.

Sincerely,

Diana Cassady, Third Act Sacramento Facilitator

Trees for Sacramento
Trees4sacto@sbcglobal.net

March 11, 2021

Councilmember Angelique Ashby
City of Sacramento
915 I Street
Sacramento, CA 95814

Re 2016 Tree Ordinance Implementation, Problem Statement

Dear Councilmember Ashby:

You were there when the Sacramento Tree Ordinance was passed in August of 2016, and you were instrumental in ensuring that the public was heard and counted in the revisions to tree protections by the City. One of our key issues at that time was transparency and accountability in the tree removal and mitigation process. Trees4Sacramento has been troubled about the lack of full accountability and transparency in the Urban Forestry Program. This letter explains why and asks for your help. Publicly available reporting on the program is almost non-existent. The Budget process reveals no useful information on the performance of the Program. Nor does the Urban Forestry website.

In particular we are concerned with lack of information about mitigation fees collected, and expenditures from the Tree Replacement fund to implement mitigation. Specifically, have any tree permit mitigation funds been diverted, borrowed or transferred to other city functions (other than tree replacement)?

Note that the urgency of tree protection and preservation has only grown more important since the ordinance was passed. For example the 2020 Mayors' Climate Commission report reiterated the importance of trees in addressing the climate

crisis and the lack of equity in tree distribution and included a Tree Master Plan by 2021 as one of its top ten goals.

What Urban Forestry Does (from City web page)

"The Urban Forestry section of the Department of Public Works is charged with the care of our urban forest. Staff members in the Urban Forestry section, many being Certified Arborists and having decades of experience, do the following:

- Plant, maintain, prune and remove public trees
- Issue permits to prune, remove, or impact city and private protected trees
- Review pre-development plans and landscape plans that involve city or private protected trees
- Create and maintain a list of preferred street trees
- Partner with external non-profit organizations to expand the urban forest and to educate citizens about the right tree in the right place and proper tree care"

Neither the website nor the Annual Budget disclose information about performance except annual trees pruned. Permits issued, permits denied, trees removed, trees planted, City trees removed and replaced, number of development projects seeking private and/or City street tree removals, total and detailed revenues and expenditures, contracts with external partners – none of this is reported to the public. The only information is a list of proposed permits for private tree removal, and a list of proposed city trees to be removed, lists which are public only for the period an appeal may be filed on that tree removal. Even this process is not completely transparent and lacks basic information. More than four years ago we requested that the tree species and diameter be listed on the tree removal web page. Urban Forestry responded that the web page design does not allow for additional text.

Is Funding Adequate?

The General Plan (ER 3.1.9) provides that:

> "The City shall provide adequate funding to manage and maintain the city's urban forest on City property, including tree planting, training, maintenance, removal, and replacement. *(SO/FB)* "

We see that many projects in the City have been rapidly eliminating or compromising City street trees and private protected trees. This ranges from State Buildings and private infill projects taking out large canopy trees to utilities like cable, 5G and water meter installation not only removing trees but affecting tree roots and space for future tree growth, effectively changing the potential tree canopy for the City. We are aware of significant removal of trees by PG&E, SMUD, ACE, and SAFCA that were exempted by the City from permitting process. We see no reporting on the adequacy of permit fees to offset the tree and canopy losses being sustained.

We are unable to track the expenditures from the Landscape and Lighting Revenues in the Urban Forestry Program. How are L&L revenues being expended for urban forestry services and has this changed from past practice?

No information is provided in the Annual Budget that would help to determine whether funding provided is adequate. We have no information on the revenues (and sources of revenues), and program expenditures, nor comparisons with earlier years.

We note that Tree Replacement Fund dropped from $215,000 in 2015/16 to a budgeted 120,000 in this fiscal year and thereafter in the five year cycle (p. 86, 2020/21 budget). But was budgeted at $703,000 through 2/2020. This indicates that the tree replacement expenditures for mitigation are not keeping pace with the tree removal impacts. How does Urban Forestry keep track of its mitigation obligations and assure that they have been discharged in a reasonable period of time?

On p. 417 of the 2021/2022 Annual Budget, the Public Works Department was authorized to adjust the revenue budget (15001811) and the expenditure budget in the Tree Planting and Replacement (R15188500) project based on actual revenues received in the Tree Planting and Replacement Fund (Fund 2035). This indicates that the budget document is not a reliable source of information about either tree replacement revenues or tree replacement expenditures. This pattern of budget reporting for tree permit fees goes back several years and fails to disclose to the public what actually is happening with revenues and expenditures in this permit program. <u>The instruction to adjust the budget suggests that accumulated funds may be diverted to another program without Council review.</u>

No Report Back to Council on 2016 Ordinance Update Implementation

On Aug 3, 2016, City Council adopted an updated tree ordinance for managing and protecting the urban forest. (Ordinance Amending Sections 2.62.030 and 8.04.100, Deleting and Adding Chapter 12.56, and Deleting Chapters 12.60 and 12.64 of the Sacramento City Code Relating to Trees (Passed for Publication 07/19/2016; Published 07/22/2016) Report # 2016-00705

When this Ordinance was being considered Trees4Sacramento requested that an annual report be prepared, made public and a Council hearing held to review the performance of the new Ordinance and the Urban Forestry Program. This has never happened.

The approval of this Ordinance included direction to staff that "an annual report, or an as-needed report, for council discussion re the status of the ordinance with statistics and data." The Public Works Department has never presented such a report for Council discussion.

No Annual Report as Promised in Settlement with Tree Advocates Sacramento

On October 25, 2017 the City signed a Settlement with Tree Advocates Sacramento (not affiliated with Trees for Sacramento), providing in part that the City would prepare an Annual Report for the public on the status of Sacramento's urban forest. No report has been published to date. Other elements of that Settlement Agreement are also pending.

No Urban Forest Master Plan as promised.

In 2017, the City initiated the Urban Forest Master Plan process as promised in the 2016 adoption of the new Tree Ordinance. The promise was that the UFMP would go to Council within 18 months of the August, 2016 adoption of the ordinance. The expected release of the report in 2019 did not happen. Completing a Tree Masterplan was one of ten Mayors' Climate Commission goals that Council committed to completing in 2021. A draft was promised for early 2021. That draft has not been made public as of this date. Again, the transparency and accountability of the urban forestry program has been sacrificed, along with public confidence.

What About Trees in City Parks?

During the adoption process for the 2016 Ordinance Update, we were assured that more trees would be protected in the City because all City owned trees would come under protection. We have seen no report back to demonstrate that in fact, our City Parks trees are now protected from removal. The use of McKinley Park for a sewer vault is one example of lack of protection for trees in City parks. It is unclear to us who manages trees in City Parks and how the City provides more protection now than it did in 2015 and prior years. There seems to be no publicly accessible accounting for maintenance and replacement for City Park trees.

No Data on Parking Lot Shade Ordinance Enforcement

The parking lot tree shading ordinance (1983) requires that all new parking lots include tree plantings designed to result in 50 percent shading of parking lot surface areas within 15 years. In 2001, E. Gregory MacPherson, Ph.D. (USDA Forest Service) published a study finding that Sacramento parking lots were woefully short on achieving the 50 percent shade requirement. ("Sacramento's parking lot shading ordinance: environmental and economic costs of compliance," *Landscape and Urban Planning* 57 (2001) 105–123)

The City of Sacramento Parking Lot Tree Shading Design and Maintenance Guidelines were adopted by the City in 2003 in an attempt to improve performance of the parking lot shade ordinance. We are aware that Urban Forestry staff prepared further guidance that was not implemented and suspect that there has been backpedaling on this important canopy and shade regulation issue.

We continue to ask that the City allocate funds and apply for grant funding as well to initiate a Parking Lot Shade Ordinance enforcement program to improve canopy coverage in the City. This is an area where adequate funding as called for in the General Plan is lacking and there is no evidence of enforcement despite a 20 year old evaluation that the ordinance is not achieving its goals.

Request for Information, Transparency and Regular Evaluation of the Urban Forestry Program

We hope that you will assist us in getting release of the detailed data on revenues, expenditures, permits, tree removals, and tree plantings by fiscal year since 2014. The public is entitled to these data to monitor City performance in urban forestry.

We ask that the City Council direct Urban Forestry and the Department of Public Works to prepare a report back to the Council by December 31, 2021 on the implementation of the 2016 Tree Ordinance Update and the performance of Urban Forestry programs in each fiscal year and cumulatively. The report should include performance indicators on the status of the City's Urban Forest. We request that performance indicators be included in the annual budget report.

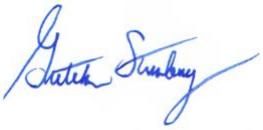
We look forward to your advice and counsel on these issues, and to working with you this year to improve the accountability of the Urban Forestry Program. Please contact us via email at trees4sacto@sbcglobal.net.

Thank you for your attention and concern.

Kate Riley

Jude Lamare

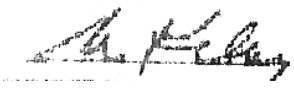
Karen Jacques



Gretchen Steinberg

Dan Pskowski

Jim Pachl



M. N. Kelly

Draft Climate Action and Adaptation Plan Draft

Comments by Trees for Sacramento

August 23, 2023

To the Mayor and Council Members

Trees for Sacramento represents citizen activists concerned about the loss of trees and tree canopy in the City as it accommodates population growth within the built area, and the ongoing lack of resources and Council commitment for growing the urban forest. The health of the City and its residents depends on the extent and health of its urban forest. This Plan must be more proactive in addressing the weaknesses and failures of the City's urban forest management.

This document includes comments submitted earlier to the Climate Action Team and Council as well as specific language revision recommendations.

Trees should play more than a cameo role in the CAAP. As the Plan states on p. 25,

> "Inventories measure GHG emissions in units of metric tons of carbon dioxide equivalent (MT CO2e). One MT is equivalent to 2,205 pounds, roughly the same volume as a small two-story house and roughly the weight of a small sports car (Figure 2-1). The average car produces 5 MT of CO2e in 1 year. Alternatively, planting 17 new trees removes about 1 MT CO2e from the atmosphere over 10 years."

Removing trees likewise adds MT CO2e, but this plan fails to account for ongoing loss of tree canopy, resulting increases in MT CO2e, and the City's lack of commitment to prevent canopy loss. The CAAP sets very ambitious canopy cover goals without adequate measures to achieve the goals. Perhaps the most important tool to meet the CAAP goals for canopy cover is not mentioned: protecting the existing canopy. The large trees that we have now grew to their current size by accessing soil that will not be available to the trees that replace them. The current tree canopy in many parts of the City has decreased and will continue to decrease without significant changes to the design standards and much more aggressive public tree planting, green space planning and tree care.

The success of this effort depends on the strength and vitality of the City's Urban Forestry program. However, for reasons stated below and in attachments, success is unlikely without substantial reforms in how the City manages the urban forest and how it resolves conflicts between design standards and tree protection policies.

The Role of Urban Forestry in the Climate Action and Adaptation Plan

We have a fundamental disagreement with the Plan's unstated assumption that the canopy goals can be achieved absent a major reform of the way that the City does Urban Forestry. We have elsewhere (see attachment) documented why we believe the City has lost at least a third of its tree canopy over the last 30 years despite lofty goals and policies to protect and plant trees. Given the key importance of tree canopy to the future health of the City and its residents, this function of municipal government must be elevated in the management structure of the City, and report regularly to the City Manager and the Council. At present, it is literally buried in the Public Works Department and its activities are not transparent and accountable to the public and Council. Urban Forestry should be removed from the Public Works Department and included in a new department committed to the implementation of the Climate Action and Adaptation Plan. We also believe that a Citizen Advisory Committee on the Urban Forest is a necessary prerequisite for the City to stay on track with canopy expansion goals and to protect the public interest in maintaining canopy trees.

Reliance on Yet to Be Adopted Plans

In general, the Climate Action Plan relies on other as yet un-adopted plans to demonstrate compliance, and fails to disclose what mandatory features of those plans will produce the necessary climate protections.

Draft General Plan. The 2040 General Plan draft land use map is available and supports infill. However it can be changed before adoption, and lacks a key commitment to an urban limit line that would be an important underpinning for the Climate Action Plan. While the City takes actions to reduce GHG emissions, it must also protect against countervailing actions that would increase those emissions, such as permitting development outside the current City limit on agricultural land and ministerial approval of projects that will remove existing trees. We strongly recommend that the Climate Action Plan not simply reference the Business As Usual land use plan of the draft 2040 General Plan but require City to adhere to this land use plan, and include the existing city boundary as an urban limit line, as an implementation measure for Climate Action.

It is essential that infill does not destroy current and future urban canopy coverage. Systemic change is needed across plans, ordinances, regulatory frameworks, and design standards; without this, infill will lead to an unlivable City without the shade canopy that is absolutely essential to the residents' health and the City's future.

Urban Forest Master Plan. The UFMP was promised to be completed by 2018. A draft has not been circulated. Yet the Climate Action Plan Preliminary Draft identifies the UFMP as the implementation measure to achieve the tree canopy increases required by the CAAP. We cannot review and comment on measures that are unknown. The Climate Action Plan should spell out measurable, enforceable actions.

We have submitted comments to Urban Forestry on the UFMP which are attached and contain our recommendations.

The Climate Action Plan states on page 122 "Additional funding, land use regulations, and new incentive programs will be needed to reach these targets." Where in the CAAP are these measures described and committed to?

The Plan acknowledges that "Tree planting on private property will need to double. New funding sources for urban forestry expansion and management are TBD, including but not limited to grants funding." Appendix D, CS1-1, describes funding need for only management of City trees ($6- 8 million) but lacks the detail and commitment to carry out the canopy expansion goals of the CAAP. Funding for management of existing city trees is now included in the City Budget, so why is additional funding for this purpose included in the plan but no fund estimate is provided for the canopy expansion called for in the Plan?

Likewise on p. 53, "Funding and financing strategies are needed to help protect low-income and disadvantaged communities from increased tree maintenance cost…." Where in the CAAP is the funding strategy for necessary maintenance for new trees in low income areas?

Accountability and Enforceability?

> "As a qualified GHG reduction plan (explained in ***Chapter 1***), Sacramento's CAAP is required to specify performance standards for measures and actions, establish a mechanism to monitor the plan's progress towards achieving its climate action targets, and include the requirement for amendment if the plan does not demonstrate achievement of its climate action targets. (p. 131)
>
> "[Chapter 8 details] Sacramento's approach to implementing and monitoring the CAAP to ensure actual GHG reductions are achieved in line with the City's climate action targets and demonstrates alignment with the CAAP for CEQA streamlining of future development projects." (p. 132)

We are concerned that the citywide plan to claim GHG reductions without project level CEQA review and mitigation will result in further reductions in livability and environmental quality of the City through reduction in tree canopy and permeable surface without equivalent expansion of tree canopy and green space.

The Plan lacks the funding and resource capability to offset the canopy losses it will generate through CEQA streamlining in addition to canopy expansion. How does the plan account for unmitigated loss of canopy and permeable surface due to CEQA streamlining and other City policies allowing canopy trees to be removed?

The City to date has failed to develop any accountability measures for Urban Forestry despite repeated citizen requests for annual reporting of tree removal permits granted, mitigation fees collected, and trees planted. Without reporting to the Council and public what tree resources have been removed and what tree resources have been added to the urban forest, how can the CAAP monitor compliance? There is no accountability for

the Tree Replacement Fund (fees for tree removal that are intended to plant trees to mitigate for impacts) and no way to determine if it is achieving its goal.

The CAAP CS1-1 (Appendix D) lists " Continue to enforce zoning standards for shading in private parking lots to protect trees in existing parking lots" as a measure. This means that when a parking lot is built, it must show a plan for canopy coverage of 50 percent of the surface. Yet there is no evidence that there is any enforcement of these standards once the parking lot is completed. To meet the canopy goals, the City must adopt and enforce an aggressive parking lot **maintenance** of shade requirements ordinance with funding for real enforcement and real tree planting to achieve the standard.

The City budget is not a guide to Urban Forestry's performance. The CAAP should be supported by a budget document that explains how in the City annual budget the canopy protection and expansion measures are funded, what past performance has achieved and what is to be achieved in the budget year. Without annual reporting and transparency, how can this effort be more than a paper plan without measureable results?

Urban Forestry has experienced serious funding erosion: Urban Forestry's budget was cut in half – from $6 million to $3 million. Where did the $3 million annual General Fund go? This siphoning off of the 3 million dollars started when Urban Forestry was moved from the Parks Department to the Public Works Department.

Please see the attached March 2021 letter detailing our recent concerns about lack of accountability in the Urban Forestry program.

Conflicts between City Codes and Departments Threaten Canopy and "City of Trees" Reputation

> “Sacramento is well known as the City of Trees, with more than 19% of the city covered by tree canopy. These trees provide numerous benefits to Sacramento by cleaning the air, sequestering carbon, **reducing water runoff**, and keeping temperatures manageable during extreme heat events. By expanding the canopy, especially in neighborhoods with low tree coverage, the City can increase carbon sequestration, address climate injustice, and build resilience to a changing climate.” (p. 6)

Our concern with the above description is that the CAAP fails to protect the maintenance of green space and tree canopy where it currently is performing all these functions, does not account for the removal of canopy and permeable surface, and falsely relies on new tree plantings in other areas to compensate for the losses. The City must account for anticipated losses in canopy and open ground (permeable surface) and compensate for those before it can claim that tree planting will expand canopy, "increase carbon sequestration, address climate injustice and build resilience to a changing climate." It must acknowledge that old canopy trees provide much greater canopy benefits than young trees. And that it takes many years for canopy to grow.

We see two City policies that threaten the existing tree canopy.

Missing Middle Housing Policy. The City should amend its Missing Middle Housing policy which allows MMH in residential R-1 neighborhoods that contain most of the city's tree canopy because it is counterproductive to this strategy. It is a zero-sum-game to reduce tree canopy in some parts of the city (through building in spaces where trees and buildings cannot occupy the same limited space) and "growing" it in another.-

The City should seek to counter the effects of creating urban heat islands by avoiding "clustering" MMH on adjacent lots without an overall strategy for limiting tree loss (such as overlays and objective design standards). The problem inherent in objective design standards as a solution is that once a property owner has a right to build MMH, it will be difficult to impossible - even with objective design standards - to tell a property owner they cannot cut down a tree to build. The property owner can also request variances from design standards such as lot coverage and setbacks, which the city will likely grant, resulting in less green space. SB 8 (successor to SB 330) will not allow the city to put the density genie back in the bottle. (Reference: Measure E-5.2 -E-5.4, pp. 95-97.)

How will the CAAP anticipate and mitigate losses to the tree canopy from City housing policies? Will the CAAP require new mitigations, limits to canopy removal by neighborhood, or planning tools such overlays?

Ministerial Approval of Development Projects and Utility and State Exemptions from Tree Ordinance Preclude Proper Review of Tree Removals

In 2016 when the tree protection ordinance was revised, we were assured that new development tree removal permits would be subject to public hearing review in the planning process. We were told that the new ordinance would give better protection for public trees.

Now, however, Under Title 17, most projects are accorded a ministerial review and no public hearing is provided; developers then apply to Urban Forestry to obtain discretionary tree removal permits for their already approved project. By the time the tree removal permit is up for appeal, the project has been approved by the Planning Department. This process should be reversed, with tree removal permits required **before** the project is processed for ministerial review. Alternatively, the City should require discretionary review of projects that include significant tree removal, which would include any large canopy trees and any public trees. We are currently witnessing a ministerial project approval with 44 trees to be removed, including public trees and native oaks.

All building design standards and ministerial processes need to include objective requirements for tree protection – both of current canopy trees and maintaining space for future canopy trees. Without this objective requirement, infill and other ministerial development processes will result in rampant deforestation of Sacramento.

In the years since the 2016 tree protection ordinance was revised, we have witnessed the loss of many public street trees to make way for new buildings, including state buildings exempt from City regulation. We've witnessed clearcutting of canopy trees at

public housing redevelopment sites. We've witnessed public utilities remove countless trees on public land under an exemption from local ordinance. Our experience tells us

that canopy loss since 2016 has been very significant and our local law and practice is not protecting the canopy that we have.

Urban Form and Climate Action Planning

We think the CAAP should take a more strategic approach to overall urban form and find a way to quantify, evaluate, monitor and expand greenspace and permeable surface as the City grows. The Plan also needs to find a way to address citywide drought management for the urban forest to be able to adapt to climate change. The Plan refers to the need for ways to help low income neighborhoods expand tree canopy, but offers no real solution. Here are some other areas in the Plan where the issue is touched on but in no way resolved.

> **Groundwater Supply and Protection**
> "These changes could lead to drought, **groundwater depletion**, increased wildfire risk, changes in streamflow, decreased drinking water supply and availability, and strain to health, energy, and infrastructure systems." (P. 15). See also pp 16-17
>
> "Streamflow declines and changes in precipitation patterns anticipated under continued global climate change will likely increase demand for groundwater. Groundwater currently comprises about one-third of the Sacramento region's water use, and studies have shown that regional rates of groundwater extraction increase under drought conditions. While the City's groundwater supplies are currently being managed sustainably, too much stress on the groundwater supply can lead to higher groundwater pumping costs, decreased streamflow, land surface subsidence, and loss of wetland ecosystems." (p. 18)

The Plan largely overlooks the benefit of green space for water conservation. Water runoff on hardscape, including storm water runoff, exacerbates groundwater depletion, as the water could be filtered by trees and green spaces into the aquifer.
More density = more hardscape = less groundwater. It is essential that the city plan wisely, for drought protection and to avoid groundwater depletion.

> **Street Tree Planters**
> "MUNICIPAL MEASURE 6: Improve carbon sequestration potential of municipal parks, greenspace at City properties, **and street tree planters in the public right-of-way**" (p. 184-185.

There is no discussion on using "street tree planters in the public right-of-way" to further climate action goals. How or who would implement this strategy?

> **Water Related Emissions**
> "Water-related emissions are generated by the electricity used to transport water for residential, commercial, and agricultural use, as well as emissions from wastewater treatment processes." (p. 8)

Water runoff, including some storm water runoff in the City, goes into the sewers and ultimately to the river and carries pollutants. Water captured by the city's storm drainage system and sewer system is subject to wastewater treatment processes. Trees and green spaces filter the water and allow it to drain into our aquifer rather than into drainage and treatment systems that use electricity to function. (https://www.cityofsacramento.org/utilities/drainage/stormwater/About-Us/Program-Information). The CAAP does not adequately credit trees and green space for avoidance of water-related emissions, and does not recognize how this avoidance can be increased in the future. It thus lacks adequate measures to protect such areas from loss of permeability.

> **Urban Heat Islands**
> "The effects of temperature increase are likely to be felt throughout Sacramento –**especially in more densely developed areas with less green space** – between May and October each year, with temperatures peaking in July and August. Therefore, these impacts are felt more acutely by under-resourced and lower income communities. Overall temperature increase can also lead to more frequent extreme heat days and heatwaves; the intensification of the urban heat island effect; greater heat-related illnesses such as heat stroke and heat exhaustion; and stress to infrastructure, as discussed below." (p. 10)

Won't cutting down trees, including private protected trees, to build ADUs, duplexes, triplexes and fourplexes create and expand urban heat islands - "holes" in the city's rich, mature tree canopy? Creating a right to these permitted uses in R-1 zones of the city with no limit on the effects of "clustering" of structures will further exacerbate this effect. Areas of the city that are desirable for the foregoing types of development will suffer loss of tree canopy. How will the CAAP anticipate and mitigate losses to the canopy from City housing policies? Will the CAAP require new mitigations, limits to canopy removal by neighborhood, or planning tools such overlays? What policies and measures can protect city residents against expansion and creation of urban heat islands as the City grows?

Climate Plan Should Account for City's Permanent Protection of Open Space and Agriculture

The City has permanently protected from development thousands of acres of agricultural lands and open space through regulation of new development. The primary example is the Natomas Basin Habitat Conservation Plan. Though the protected lands are not in the City of Sacramento, the City should claim emission reductions from the permanent designation of these lands for habitat.

We Support Mow Better.

The CAAP should include Mow Better's goal is to eliminate the use of gas powered lawn equipment (leaf blowers, lawn mowers etc.) as climate actions. This includes:

1) The City of Sacramento should commit to converting its own lawn care tools as well as tools used in the City's 17 Property and Business Improvement Districts (PBIDs) from gas-powered to clean electric- and people-powered tools and set an example for residents to follow.

2) The City of Sacramento should work to create a friendlier environment for clean modes of transit such as biking and walking through more robust enforcement of existing lawn care equipment restrictions, especially restrictions on times of use for gas-powered leaf blowers in residential areas (not permitted before 9 am or after 6 pm Mon-Sat or before 10 or after 4 on Sunday), and prohibitions on the use of any blowers on days when the AQI is above 100.

3) The City of Sacramento should incentivize more lawn removal to reduce water use and noise and air pollution caused by the use of lawn care equipment. Property owners should be able to receive incentives for **any amount** of lawn replacement, even just "mow strips", to set an example for moving toward drought-tolerant landscaping. The City should devote more resources to publicizing this program.

As part of this effort, we recommend also that:

City specifications for designs for "complete streets" and other multi-modal transportation options must include planning, space and irrigation requirements for tree canopy coverage of these pedestrian and bike friendly transportation routes. Otherwise, the routes will be unusable during heat events.

The City should incorporate canopy tree requirements in its lawn removal program. This should include requiring set-aside space for low-water need canopy trees and requirement that drip irrigation include dedicated stations for tree watering. Canopy trees can and should be preserved in xeriscapes wherever possible. Saving trees and setting aside space for trees in xeriscapes should be incentivized by additional awards. All training and information materials should emphasize the importance of saving existing canopy trees in yards and providing space for future canopy trees in new low-water landscapes.

Chapter 7: Adaptation - Heat Summary

A necessary element of reducing exposure to urban heat islands is preserving existing urban tree canopy cover. We need amended planning and tree ordinances regarding tree removals.

Approximately 80 percent of the city's tree canopy is on private property, much of it in residential back and front yards in existing R-1 residential neighborhoods, which the city has slated for up-zoning. Many of the narrow strips on which city street trees are planted do not accommodate large species with good canopy and when removed by the city due to age, structural defects or failure to thrive, often smaller species are planted. In addition, many neighborhoods, including low income neighborhoods, do not have city tree planting strips. A large species tree can thrive with more space for growth

on private property with sufficient setbacks.

We need strong planning ordinances that will protect existing trees and provide space for trees to be planted and thrive in all development projects, large and small. Without sufficient setbacks, objective design standards that protect trees, and limits on clustering of projects in residential areas the result will be urban heat islands - regardless of whether there are existing trees or whether tree canopy is sorely needed.

- In areas with good tree canopy (generally considered desirable neighborhoods), trees will be cut down to accommodate structures, including ADUs, duplexes (already allowed by SB 9), triplexes and fourplexes, creating urban heat islands.

- In areas where trees are needed as a matter of environmental and economic equity, clustering of projects will leave no place to plant trees and improve air quality, ensuring existing urban heat islands.

Inaccurate Photos in Plan

Finally, we'd like to point out that the photos on pages 165, 308 and 410 do not accurately portray trees at those locations today. The photos thus give an impression about our urban forest that is misleading. Please pair these photos with current day photos to illustrate how tree loss is affecting our city.

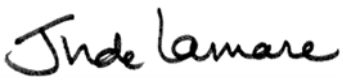
There are many moving parts to the heat equation and our trees are already here. Why cut them down to build housing? We can build more housing intelligently, and preserve our tree canopy as well.

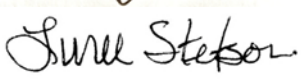
Thank you for your attention to these comments; we hope to work with City staff to create plans, codes, and standards that will protect and grow Sacramento's urban tree canopy.

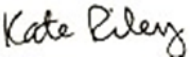
Please see below for specific recommended revisions to CAAP language.

Sincerely,

TREES FOR SACRAMENTO







Attachments

Specific recommendations: Climate Action and Adaptation Plan

Page 5, Built Environment
Sustainable Land Use
We do not see how the city can retain the “lush urban forest” in established neighborhoods by up-zoning all R-1 parcels for higher density (duplexes, triplexes and fourplexes) “by right” without objective design and zoning standards that would prohibit canopy loss. As 80% of the city’s tree canopy is on private property, much of it front and back yards in residential areas, LUP-6.5 sounds like a hollow promise. A tree and a building cannot occupy the same space.

Page 5, Community Health and Resiliency
Urban Greening and Forestry
The baseline canopy goals should be 35% by 2030, 45% by 2045.
Austin, Texas, another city with urban heat concerns, currently has a higher existing tree canopy and much higher future canopy goals (see General Plan letter for details).

Page 7, City of Trees

The concept of preserving our existing canopy is missing here. We must plant many trees in disadvantaged neighborhoods, but we cannot grow our canopy if mature, existing trees are being cut down for housing throughout the city. Planning and Zoning codes need to prioritize preserving the canopy.
In many disadvantaged neighborhoods, the city must also help maintain and water private trees, as these neighborhoods were planned without park strips/planting strips that are generally a public right of way for planting city street trees.

THE CITY MUST ENSURE THAT FUTURE DEVELOPMENT REQUIRES INCLUDING SPACE FOR TREE CANOPY GROWTH.

Page 15, Urban Heat Islands
We must plant many trees in disadvantaged neighborhoods, but we cannot grow our canopy if mature, existing trees are being cut down for housing throughout the city. Planning and Zoning codes need to prioritize preserving the canopy. The city’s plan for housing growth is at cross-purposes with canopy growth without the proper protections in place.
Objective design standards are a must to keep the increased density from decimating the existing canopy, leave space for new tree plantings, and avoid the creation of new urban heat islands due to clustering of separately-approved development projects.
In many disadvantaged neighborhoods, the city must also help maintain and water private trees, as these neighborhoods were planned without park strips/planting strips that are generally a public right of way for planting city street trees.

Page 17 - Storms

Storm runoff is exacerbated by increased density, creates increased hardscape without green space and trees. Density must be carefully planned and zoned.

Page 19 - Groundwater Supply

Storm runoff is exacerbated by increased density, creates increased hardscape without green space and trees. We must have green space and trees to allow stormwater to run into our groundwater aquifer. Density must be carefully planned and zoned

Page 53 - Sequestration and Food Waste

The concept of preserving our existing tree canopy is missing here. It, again, merely speaks of “tree plantings.” It is hopeful that at the city is considering using strategies like complete streets to help address the lack of park strips (public right-of-way) in disadvantaged neighborhoods that were planned without them. There will need to be many creative ideas to shade the homes and streets in our disadvantaged neighborhoods.

Page 53, last bullet under Key Equity Concerns

Tree maintenance, stewardship, and who will bear the costs is a crucial need in disadvantaged neighborhoods.

Page 65 Buildings Strategy - 2nd column - E-5

Objective design standards are crucial to keep the increased density from decimating the existing canopy, leave space for new tree plantings, and avoid the creation of new urban heat islands due to clustering of separately-approved development projects.
In many disadvantaged neighborhoods, the city must also help maintain and water private trees, as these neighborhoods were planned without park strips/planting strips that are generally a public right of way for planting city street trees.

Page 68 Carbon Sequestration Strategy

CS-1 The baseline canopy should be 35% by 2030, 45% by 2045.

Page 70 Built Environments - E-5

Objective design standards are crucial to keep the increased density from decimating the existing canopy, leave space for new tree plantings, and avoid the creation of new urban heat islands due to clustering of separately-approved development projects.
In many disadvantaged neighborhoods, the city must also help maintain and water private trees, as these neighborhoods were planned without park strips/planting strips that are generally a public right of way for planting city street trees.

Page 71 CS-1 Carbon Sequestration

The baseline canopy should be 35% by 2030, 45% by 2045.

Page 73 Equity

Tree maintenance, stewardship, and who will bear the costs is a crucial need in disadvantaged neighborhoods.

Page 76 Public Health, 2nd column
Again, the concept of preserving our existing tree canopy is missing here.

Page 78 Adaptation, 1st paragraph
Again, the concept of preserving our existing tree canopy is missing here.

Page 96 - E-5.1 2nd bullet
We do not see how the city can retain the “lush urban forest” in established neighborhoods by up-zoning all R-1 parcels for higher density (duplexes, triplexes and fourplexes) “by right” without objective design and zoning standards that would prohibit canopy loss. As 80% of the city’s tree canopy is on private property, much of it front and back yards in residential areas, LUP-6.5 sounds like a hollow promise. A tree and a building cannot occupy the same space.

E-5.4 The city cannot retain the “lush urban forest” needed to combat climate change by up-zoning all R-1 parcels for higher density (duplexes, triplexes and fourplexes) “by right” without objective design and zoning standards that would prohibit canopy loss. As 80% of the city’s tree canopy is on private property, much of it front and back yards in residential areas, LUP-6.5 sounds like a hollow promise. A tree and a building cannot occupy the same space.
In addition, the city needs to end its program that allows short-term rentals (Airbnb, stock.

Page 124 - CS-1.1 The baseline canopy should be 35% by 2030, 45% by 2045. The concept of preserving our existing canopy is missing here. We must plant many trees in disadvantaged neighborhoods, but we cannot grow our canopy if mature, existing trees are being cut down for housing throughout the city. Planning and Zoning codes need to prioritize preserving the canopy.
In many disadvantaged neighborhoods, the city must also help maintain and water private trees, as these neighborhoods were planned without park strips/planting strips that are generally a public right of way for planting city street trees.

Page 136
Sewer, stormwater, and flood control infrastructure
Increased hardscape and removal of our existing tree canopy and green space to create housing will lead to more stormwater runoff and less water going into, and replenishing, our underground aquifer. We need proper protections for our tree and green space resources embedded in our housing plans.
In an extreme flooding situation or other natural disaster, without a sufficient number of personal vehicles for evacuation, many Sacramentans could perish. Citizens will not be able to rely on public transit to get to safety. Does the city have a disaster plan to match its transit and mobility plans?

Page 146 - Goal A-2
Neither GP 2040 nor the CAAP have provisions for preserving our existing, mature tree

canopy. The city's plans to allow increased density through "missing middle housing" in mostly single-family zones, including in areas with good canopy holds the possibility of decimating the existing mature tree canopy and creating urban heat islands. This will be a net loss to the canopy if community development/planning can3-2not create robust objective standards to protect trees, maintain space for trees, and avoid clustering of separately-approved projects. In areas that lack good canopy, many lack public right-of-way planting space for city street trees, due to what we now see to be poor planning. The city planted and maintained thousands of trees in front yards in such areas, and then in the early 90s, abandoned these trees and left it to the homeowner to maintain them. In low income areas where at least half the homes are rentals, or the residents cannot afford arborist services, this has been a disaster, as the maps sadly show. As the city only own 10% of the tree canopy, with another 10% on other government agency land, and 80% of the canopy on private property - mostly in residential back and front yards - something must be done to work with citizens to create and maintain our tree canopy. In the case of environmental and economic justice areas, this means funding for maintenance and watering.

Page 147 - ERC-8-2 Large Heat Islands
Streets lacks room for city street trees in many of disadvantaged communities, which were planned without planting strips or other right of ways for city trees. It is a matter of economic and environmental justice not to merely provide “information and incentives” in such neighborhoods, but to fund and assist homeowners and renters (which are at least 50% in most neighborhoods) in planting, maintaining and watering trees, including arborist services that are provided in neighborhoods that have city trees.

Page 148 - ERC-3-2: Tree canopy expansion. See our comments on ERC-3-3 below. The City can’t expand the canopy if it does not adequately protect the canopy that exists. We should strive to achieve 35 percent canopy cover by 2030 and 45 percent by 2045.

ERC-3-3: Tree Protection
This is virtually no protection for our existing, mature canopy. Requiring "private development projects to ***consider*** alternatives to removals of healthy trees" is no requirement at all. If there is a lack of objective design standards the trees will fall, especially in the case of ministerial approvals of projects large and small. Purporting to grow the canopy at one end (with likely small initial plantings) and cutting down large, mature trees for housing projects, is worse than a zero-sum game.

ERC-3-6: Urban Forest Maintenance
As we have said elsewhere, the city needs to maintain trees that are NOT on city property in disadvantaged neighborhoods that were planned out without public right-of-way tree planting strips. These streets and homes deserve and must have the shade and increased air quality benefit of trees. This was a planning error that must be rectified.

ERC-3-11: Planting

We need to change “encouraging” development to do the right thing for our tree canopy into requiring, for plan approval.

Page 150 A-2-3: Cooling landscape standards
We object to “The City shall prepare a Landscape Manual or enhance landscape standards….” This is not an either/or situation. Both should be done, but if only one is done, enhancing landscape standards is a must.

A-2-6:
2nd bullet: “Opportunities to provide incentives or requirements” - weak language. Should be “Provide incentives and requirements.”

4th bullet: re Chapter 12.56 of the City Code related to tree permits for ministerial development project review:
There must be objective design standards that are part of the ministerial review checklist. Currently, after a project is approved and is a "done deal," the developer applies for tree removal permits. By the time the tree removal permit is considered, the developer has completed plans. This is how we lose existing tree canopy.

Page 179

ERC-5-2: Reducing Storm Runoff
Instead of “encouraging designs that,” it should be “require designs to.” In addition limiting project size to allow the use of green space and trees would mitigate storm runoff.

Page 186
Measure CS-1
Urban tree canopy cover should be increased to 35% by 2030 and 45% by 2045.

Please review our attachments for more detailed explanation of the comments made here.

Page 5, Community Health and Resiliency Urban Greening and Forestry
The baseline canopy should be 35% by 2030, 45% by 2045. Currently, Austin, Texas, another city with urban heat concerns, currently has a higher existing tree canopy and much higher goals.

Austin, TX: As of 2022 - 41% canopy coverage, up from 36% in 2018. Austin’s Climate Equity Plan calls for 50% tree canopy coverage by 2050.
https://www.austintexas.gov/blog/austin-closer-its-canopy-goal-50-2050-0

Sacramento’s canopy:
More than 19% (Source: p. 7 - CAAP draft); actually:

19.1% (p. 6 - Urban Tree Canopy Assessment 2018 by Davey Tree)
Page 7, City of Trees
The concept of preserving our existing canopy is missing here. We must plant many trees in disadvantaged neighborhoods, but we cannot grow our canopy if mature, existing trees are being cut down for housing throughout the city. Planning and Zoning codes need to prioritize preserving the canopy.

In many disadvantaged neighborhoods, the city must also help maintain and water private trees, as these neighborhoods were planned without park strips/planting strips that are generally a public right of way for planting city street trees**.**

Recommendations for the Sacramento Urban Forest Master Plan Update and Amendments to the City Tree Ordinance
Trees for Sacramento
March 29, 2019

As the City revises its Urban Forest Master Plan (UFMP), **Trees for Sacramento (TFS)** respectfully submits these comments and recommendations.

Section I is based on categories included in the Stakeholder Representative Group (SRG) Presentation by the UFMP update consultants called "Focus Areas for the Urban Forest Master Plan."

Section II includes additional recommendations beyond the focus areas.

Section III comprises recommended amendments to the City Tree Ordinance adopted in 2016.

I. FOCUS AREAS FOR THE URBAN FOREST MASTER PLAN

1) Protection/Preservation

Do you feel that trees in Sacramento are adequately and reasonably protected from pests, diseases, and unnecessary removals?

No. The protection of Sacramento's Urban Forest (UF) has suffered as too many trees have been removed to make way for development. For example, the Sacramento Commons project, approved in July 2015, authorized removal of 199 trees on Capitol Towers' 10-acre downtown property. In River Park, SMUD removed 63 trees in its Safety and Reliability Project in Winter 2019. Similar removals have been occurring in Land Park. At the Twin Rivers Sacramento Housing and Redevelopment Agency (SHRA) Project, 30 healthy canopy trees were removed. At the renovation and expansion of the Sacramento Community Center and the Community Center Theater, 51 healthy trees were removed in 2018. In Curtis Park, 277 trees, the majority native oaks, were removed for the Crocker Village project, a significant number between 2011 and 2012. Meanwhile, unregulated removals are occurring in unprecedented numbers. PG&E cut hundreds of trees in the American River Parkway between October 2018 and January 2019 with no mitigation.

The City must publicly disclose tree removals to assess their impact and to understand whether trees are being reasonably and adequately protected.

The May 1, 2018, report to the City Council on the first year of implementation of the 2016 Tree Ordinance, "Year One – Tree Ordinance Update," reported the issuance of 73 permits to remove City Trees or Private Protected Trees. In the Year One Update, staff indicates that annual reports are planned. TFS proposes specific contents of those annual reports in **3) Management/ Stewardship below.**

Are there any suggestions for how the City can improve protective measures?

Yes. The value of trees in "The City of Trees" should be expressed in the Master Plan. Trees can co-exist with development and infrastructure improvements. Existing trees should be incorporated into new development wherever feasible, especially when City Trees are proposed for removal. This means that the value of protect and preserve takes precedence over remove

and replace. TFS recommends that the UFMP clearly state that the goal of the Plan, and the City Code, is to protect and preserve existing canopy whenever possible. All new development must include preservation of trees as much as possible.

The UFMP should recommend that the Council instruct City planning staff to bring to the Council amendments to Design Guidelines to protect tree canopy and large tree planting spaces and proactively work with the building and design community to promote architecture integrated with large canopy trees.

A pressing issue is the City's broad interpretation of Section 12.56.050 (B) (1) in the City Tree Ordinance, which has led to widespread removal of existing canopy trees to enable development and homeowner improvements. This is discussed fully in **Section III RECOMMENDED AMENDMENTS TO THE TREE ORDINANCE.**

Notice of Proposed Tree Removals

Currently, tree removals are noticed to the public very late in the design process. For this reason, appeals become costly to the developer. The Plan and the code need to provide that proposed removals are noticed as early as possible in the design process, even before staff has made recommendations.

Also discussed in Section III is the recommendation to create an Urban Forest Advisory Commission. The Commission should monitor UFMP implementation and advise the City Council on issues and decisions relating to the UF.

Crime Prevention Through Environmental Design (CPTED) and Loss of Trees

Crime Prevention Through Environmental Design (CPTED) is defined as a multi-disciplinary approach for reducing crime through urban and environmental design and the management and use of built environments (International CPTED Association website, retrieved March 17, 2019). One CPTED tool is clearing an area of all plant cover, including trees. This tool is designed to reduce crime and clear out and prevent the return of homeless camps. In Winter 2019, the City of Sacramento used CPTED to clear a large area of landscape coverage, including trees, where Elvas Avenue joins eastbound J Street. The City has declared its intention to use CPTED on the proposed Two Rivers Trail Phase II, which, if approved, will pave a gravel toe road in the flood plain of the American River adjoining the River Park neighborhood:

> "The Two Rivers trail will integrate concepts of crime prevention through environmental design (commonly abbreviated as CPTED)… According to the National Recreation and Parks Association, and our own parks and law enforcement staff, bike trails tend to reduce crime by cleaning up landscape and attracting people who use the trail for recreation and transportation." City of Sacramento website: Two Rivers Trail – Phase II, retrieved March 17, 2019.

The City Arborist must have a role in approving any proposed CPTED action which includes removal of trees of any size. The UFMP must include specific language stating that tree canopy must not be reduced by CPTED without prior approval by Lead UF Arborist. All trees removed pursuant to CPTED must be reported in the Annual Report. Tree mitigation fees should be assessed.

Enhance Penalties for Violations

The UFMP should recommend enhanced penalties for violations of the Tree Ordinance.

2) Enhancement

Where should Sacramento focus resources on enhancing tree canopy?
What are the top priorities?

The Davey Tree Canopy Assessment (2018) describes tree canopy as "the amount and distribution of leaf surface area" (p. 1). The first priority is to set specific canopy target goals by community by specific dates. The UFMP should set Canopy Goals both citywide and in each neighborhood and Council District. A citywide canopy goal of 45.4% is possible according to the Urban Tree Canopy Assessment (2018) done by Davey for the City of Sacramento.

A 45% goal is necessary to reduce heat island effect and to keep Sacramento a livable city as temperatures rise. The most recent Intergovernmental Panel on Climate Change (IPCC) report included a warning that the world has 12 years to meet the Paris Agreement goal of keeping temperature rise under 2°C (preferably 1.5°C) to avoid the most catastrophic effects of climate change. (See "Report: Global Warming Of 1.5 Celsius, IPCC.") Adopting a 45% canopy goal by retaining existing trees and rapidly planting new trees will help Sacramento to do its part. The larger the tree canopy, the more cooling shade in summertime—shade that reduces the use of air conditioning and makes it possible to continue to walk and bike on hot summer days. The larger the tree canopy, the greater the carbon capture and reduction of greenhouse gases, and the better the storm water control during flooding and intense storms. An extensive tree canopy in Sacramento is not merely an amenity. It is a vital green infrastructure that is as necessary for livability as clean water, electricity, and sewer systems. **For all these reasons, we recommend 45% be our citywide goal.**

The UFMP must include the goal to make tree canopy more equitable across the City. There is tremendous inequity in canopy coverage in Sacramento. Under-canopied regions should be targeted for re-forestation. That includes the neighborhoods which are clearly low in canopy, as well as newly-deforested areas which have lost trees to development. To meet this goal, the City needs to direct additional City and UF resources to under-canopied areas. The City should inventory city-owned space and prioritize tree planting in those spaces.

Is Sacramento's Tree Canopy Growing or Shrinking?

The Davey Urban Tree Canopy Assessment (2018) performed in conjunction with the UFMP update, states that Sacramento's current tree canopy cover is 19.12% (p. 11). The Davey assessment looks at historical change in tree canopy using two different time periods of imagery: 2004 and 2016. Both image sources were provided by the City of Sacramento. Using these photo image sets, the assessment concludes:

"In 2004, the tree canopy was 8,856 acres, which at the time was 13.9% of the land cover. The change in canopy acreage from 2004 to today is 3,342.8 acres or a 37.8% increase in canopy cover" (p. 27).

Is this an accurate assessment of the historical trend for the City of Sacramento?

The Urban Forest Management Plan of 1994 measured Sacramento's residential tree canopy at 28% and it set a goal of 50% canopy cover (p. 45). In 2014, Sacramento's tree canopy was measured at 23.66% (K. Schwarz, et al., PLoS ONE). These studies and the Davey Study are summarized in Table 1. In light of the loss of 620 trees cited on page 1 above, and the decline in canopy between 2014 and 2016, Sacramento's tree canopy coverage is quite likely declining.

Table I: Historical Data – Tree Canopy in Sacramento

Year	Percent Canopy Coverage	Source
1994	28 % (residential)	UFMP Sacramento 1994
2004	13.9%	Davey Canopy Study 2018
2014	23.66%	K. Schwarz, et al. 2015
2016	19.12%	Davey Canopy Study 2018

The UFMP must include thorough additional analysis of Sacramento's tree canopy change – using data that reaches back more than a dozen years, and more than two data points. Aerial photos of Sacramento's tree canopy were done in the late 1980's by Radman Aerial Surveys, Inc. They could provide useful data on historical canopy change. The Davey analysis does not portray an accurate historical picture of Sacramento's tree canopy. The City Council and Sacramento citizens deserve accurate information about the history of canopy tree coverage in Sacramento.

Our current canopy cover is very low compared to many cities (e.g., Pittsburgh, PA 40% 2011, Portland, OR, 29.9%, 2014).

Sacramento's UF was included in a 2013 study of California cities (McPherson, Kotow) that emphasized performance on four measures of a stable and resilient UF. Although Sacramento received an overall grade of B, two measures were substandard: species dominance (that is, ensuring that the UF is diverse); and pest threat. The UFMP should propose steps to ameliorate these issues.

Top Priorities Should Include:

• Setting canopy goals and schedules as outlined above;

• Doubling the City's annual tree planting commitment every 2-3 years as part of the UFMP and Annual City Budget;

• Ensuring that both public and private projects include adequate root space and crown space for mature canopy trees to be sustained;

• Finding ways to ensure support for newly-planted trees during first 3 years;

• Funding a Parking Lot Shade Ordinance Enforcement Program to ensure compliance to existing law; consider increased scope for Parking Lot Shade Ordinance to include more parking lot;

• Reporting annually to the public and Council where the City's new trees are planted;

• Planting very large tree species in City Parks to ensure that very large trees are permanently included in our future tree canopy;

• Planting of native species in city parks and city spaces should be encouraged, along with appropriate landscaping;

• Adopting tree selection guidelines that aim for major canopy and species variability, as well as climate adaptability. The UFMP should include updated information about tree species best adapted to climate change stressors. A long-range study is underway and is described in the "Climate ready urban trees for Central Valley cities" article listed in the references. The tree selection guidelines should include tree species native to the Sacramento Valley. The planting of native trees should be encouraged as much as is appropriate for the species.

Design Standards

How are we designing for canopy growth especially for high-rises and infill?

Guidelines for developers should be developed along with the UFMP. Developer Guidelines were adopted with the 1994 Sacramento UFMP. The guidelines must emphasize the necessity for providing sufficient space above and below ground to grow maximum canopy. "A Guide to Preserving Trees in Development Projects" from Penn State College provides guidance to preserving existing trees in development projects. The City Design Standards should ensure that utility requirements and transit zones do not conflict with the above and below ground needs of canopy trees.

3) Management/Stewardship

Do you have any recommendations for how the City can improve on protecting, maintaining, and enhancing the community tree resource?

<u>Conduct Annual Program Evaluation with Transparency and Reporting</u>

Citizens deserve clear information on the status of our UF and tree canopy. The UFMP needs to set specific goals and specific target dates for reporting, and then require reports on trends with transparency and accountability.

Urban Forestry is a scientific enterprise. The City needs to build the databases which will enable sound program evaluation and analysis of how the UF is changing.

The Year One – Tree Ordinance Update, May 1, 2018, is a good start. The Report refers to: 1) total tree permit applications; 2) public notice for removal of 73 City trees or Private Protected Trees; 3) removal of 64 City trees; 4) Planning and Development discretionary permits; 5) two Public Project tree removals; 6) mitigation fees for 25 tree removals. The Report calls for annual updates; below are recommendations for the annual report.

What the Annual Report should include

The Year One Report states that, "The tree planting and replacement fund obtained $181,000 dollars from three permits that involved the removal of a total of 25 protected trees." The Annual Report should disclose all mitigation fees and the number of trees to be mitigated. It should disclose also where the mitigation funds will be spent. Those mitigation trees should be tracked to ensure that they are cared for in the crucial first 3-5 years of growth.

The Annual Report should be a comprehensive report on tree removal permit applications, disposition, non-emergency trees removed in each category (private permits, private development projects, parks, other city projects, state projects) and tree replacements in each category, and other expenditures from the Tree Replacement Fund sufficient to show how the funds are being spent.

The City's Annual Tree Planting Program should be separately reported by community plan area.

The Report should account for all tree removals in the City of Sacramento for reasons other than "imminent danger to public safety" that the City has approved or conditioned for removal, and all tree replacements linked to tree removals.

The Report should enable the public to account for: the annual loss of the tree resource; the cumulative loss or increase of tree canopy over time; and quantifying the tree replacement effort. We recommend that tree removals and tree replacements be documented in a database that enables third party analysis in addition to an annual narrative where categories may change from year to year. This should include species and size, both height and diameter at standard height (DSH). For public trees, this data can be analyzed in conjunction with the existing database of city trees. For private and other trees, it will at least provide a record of what has been removed and what is being planted so that trends can be identified over time.

Regarding the loss of city-owned trees, the Report should quantify tree removals for private development projects, and public development projects, including The Sacramento Housing and Redevelopment Agency and Capitol Area Development Authority and other public entities. Removal of city park trees should be a separate category.

Regarding the removal of Private Protected Trees, the Report should disclose how many have been permitted for removal, and, for each tree, if in lieu fees were a condition of the permit. Also, for each tree removal permit requiring an in-lieu fee, has the fee been paid.

In addition to annual reporting, Private Protected Tree removal permits on residential lots should be posted on the UF website so that the public can know which trees are permitted for removal from private property. Also, Private Protected Trees, Removal Permit applications should be posted on the UF website.

All trees of any size removed pursuant to the CPTED program must be reported as a separate category in the report.

The UFMP consultants could look at the Portland 2016 Implementation Plan as a comprehensive model for reporting.

Multiple Information Technology (IT) Systems should be Integrated

The existing separate UF IT systems should be combined into one system tracking tree management, tree removal and replacement, including all development project tree removals, and City Project reviews.

Reporting of Proposed Tree Removals

Proposed tree removals on the UF website should include the species and diameter at standard height (DBH) of each tree.

All trees proposed for removal should be posted both on the tree and on the UF website.

Upgrade Status of UF Section within City Hierarchy, with Greater Autonomy, Staffing, and Authority to Manage Partnerships

We recommend consideration of alternative placement for UF in the City's organizational structure for a number of reasons. UF Section Budgeting is not transparent nor is it fully disclosed in the city budget documents. Funding needs to be transparent. The UF appears to be underfunded and understaffed for the important role assigned to it in the General Plan and Code. Maximum allowable Landscape and Lighting Funds should be utilized for UF functions.

The UF Section is not listed on the City's departmental list even within the Department of Public Works. Citizens are not able to identify the Department's staff. The UFMP needs to emphasize the importance of the UF program and urge the Council to validate the program by defining it as a department.

The UF staff should be part of all major development projects providing input early in the process, not added on at the end. To ensure transparency in tree removal analysis, arborists reports, and UF evaluation of these should be easily accessed by the public and decision makers. Access should not be controlled by Planning or Public Works staff. The Community Development Department should include all UF reports in development project considerations, so that they can be publicly accessed and be available to decision makers.

UF must partner with other governmental and private entities operating in the City to preserve and to enhance the canopy. This includes school districts in the City, the County, California State University Sacramento, public utilities, and the State of California. A particular issue is that the City is not advised of proposed city tree removals by the State for its projects within City limits until very late in the development process, making preservation much more difficult and expensive than if it the City were notified as early as possible in the design process.

Developer Fees should cover UF Services

Developer fees should be adopted by City Council to pay the full cost of UF staff review of development projects. (See Section III.) We do not think it is appropriate to use Landscape and Lighting Fee revenue to review new development proposals. Property owners pay these fees for improvements in their neighborhood. The additional revenue will allow more staff time to be devoted to the public interest purposes of the Urban Forestry Department.

4) Education/Awareness

What are the key objectives that should be accomplished through community awareness and education?
*What are some suggestions for how to engage and educate the community***?**

Many Sacramento citizens do not know what is in the Revised City Tree Ordinance. Many do not know what the term "City Tree" means—a street tree in the city right of way or on City property. Many do not know the term "Heritage Tree" is no longer in the ordinance. The Heritage Tree designation was replaced by Private Protected Trees.

The City has done very little to educate the public about the Tree Ordinance. There should be a simple fact sheet about the Ordinance made easily available on the UF website. The City should develop a Tree Road Show to be presented at Neighborhood Associations to explain the UFMP, the Code, and UF resources for homeowners.

Many homeowners are removing their lawns and creating xeriscapes, so trees are suffering from loss of water. The City needs to ensure that when lawns are removed, homeowners make provisions for continuing deep infrequent watering for canopy trees.

What are the obstacles to homeowners planting and caring for canopy trees?

Cost of maintenance and concerns about large trees may be contributing factors. The UFMP should include recommendations for steps to take to encourage and support homeowners who wish to plant major canopy trees.

The City should have a tree care section on the City website with basic information for homeowners on how to care for their trees.

The City should add a full or part-time media person to UF staff to work with community organizations and media on education and outreach.

II. ADDITIONAL RECOMMENDATIONS FOR UFMP UPDATE

1) Highlight the Relationship Between a Growing Healthy UF and Climate Change

The UFMP should highlight the direct relationship between maintaining and growing a vibrant, expanding urban canopy, and addressing climate change. Tree canopy, especially large trees, is one of the most effective methods to reduce CO2 and ameliorate the effects of climate change. This should be expressly stated in the UFMP, the General Plan, including the Environmental Justice section, the Climate Action Plan, and all other relevant City Codes. Special consideration must be given to the General Plans' identified underserved neighborhoods, many of which have a severe lack of trees. Residents of these neighborhoods must be included as active participants in developing plans for the planting and maintenance of trees in their neighborhoods. The Urban Forest Resource Analysis (Davey 2018) discusses greenhouse gas reduction in the context of greenhouse gas reduction credits, or offsets (p.18). Taking action against climate change is a more

important reason to protect canopy. The UFMP must acknowledge the importance of a large, healthy UF as a significant means by which the City can address climate change.

The relationship between preserving the existing canopy and mitigating the effects of climate change should inform all City planning decisions. In light of the IPCC warning about the short time we have left to keep temperatures from rising more than 2°C, and the decades that it can take a new tree to grow large enough to provide significant shade and effectively absorb CO2, it is critical that the City do everything in its power to maintain existing trees that are healthy. This includes mandating that developers do everything possible to include existing trees in their project designs rather than removing them. Considering payments to the Tree Mitigation Fund as equivalent to lost canopy is not realistic. Any replacement tree planted through the Mitigation Fund will take decades to replace the canopy lost when mature trees were removed. City policy makers have stated that they understand the urgency of this situation. The removal of any canopy tree needs to be examined in the context of lost CO2 sequestration.

The UFMP should call for the development of a measure for CO2 loss associated with removal of trees, so that the loss can be quantified. Large trees retain carbon already sequestered in past years. (See "Re-Oaking California," California ReLeaf.)

2) Alignment with General Plan and Climate Action Plan 2012 and all Updates

The Sacramento 2035 General Plan has specific standards and goals for the Urban Forest. The UFMP and the City Tree Ordinance need to be conformed to those goals and standards.

The Climate Action Plan 2012 (pp. 4-72) identifies a commitment to annual planting of new trees, new trees in parks, and a Tree Master Plan for Downtown. The UFMP should fully incorporate these provisions of the Climate Action Plan. The UFMP should note the work being done by the US Forest Service on developing climate-ready trees for the future. (See "Performance testing to identify climate-ready trees," and "Climate ready urban trees for Central Valley Cities.")

3) Drought and Tree Survival

Recent recurrent droughts have had a devastating effect on our urban canopy. The UFMP must include proposals for preserving the canopy during drought. Of particular concern is the fate of canopy trees in xeriscapes. As the City supports the removal of lawn, it also must require that preservation of existing trees be planned for by setting up deep, infrequent watering protocols.

4) Best Practices Document

See attached recommended best practices document designed to augment and supplement existing City documents on tree care.

5) Intergovernmental Issues with Canopy Preservation and Development

The City's Tree Ordinance does not regulate trees on State and County property even if that property is within the city limits. We recommend requesting that the State and County **sign a Memo of Understanding (MOU)** with the City regarding consistency with the City Tree Ordinance in their operations, including full reporting of tree removal and mitigation. We recommend an

agreement with the State to provide same level of review and disclosure on state projects as on other projects in the City, with UF, and other arborist reports available to the public. The State has a major presence, particularly in downtown, and has been responsible for substantial tree removal in recent years.

6) Parking Lot Shade Enforcement Program

An analysis of the canopy deficit from non-enforcement of the Parking Lot Shade Tree Ordinance must be completed, as well as developing a plan to correct deficit. This must include workplace and budget needs. UF should establish a pilot project for retrofitting existing lots to meet shade standards.

III. RECOMMENDED AMENDMENTS TO THE TREE ORDINANCE

In light of the findings of lost canopy, inadequate canopy in many neighborhoods and the challenge of a changing climate, TFS recommends that the UFMP Update include a specific recommendation to the Council for comprehensive amendments to the City Tree Ordinance. The amendments are outlined below.

1) Private Protected Trees

A continuing issue is the use of Section 12.56.050 (B) (1) to authorize the removal of Private Protected Trees in order to enable "any use permitted as of right" by a property owner. What this interpretation does is to remove protection for Private Protected Trees because all that is needed is to say that the tree is in the way of a desired use. This is substantially less protection than is needed to preserve our canopy in the face of development pressure.

Recommendations:

TFS recommends amending that section of Code to clarify that there needs to be additional justification for removal of a valued canopy tree.

Code Section 12.56.050 (B) (1) currently reads:

"B. Issuance for Private Protected Trees.

1. The director shall issue the tree permits for removal of private protected trees if the director approves the tree replacement plan and the director finds:

a. That the tree must be removed to use the property for any use permitted as of right or by discretionary permit under the Planning and Development Code for the zoning district in which the property is located, and the use could not be made of the property unless the tree is removed; . . ."

We recommend the following language for this section of the ordinance:

"B. Issuance for Private Protected Trees.

1. The director shall find there are no modifications or revisions to the proposed use that would effectuate its basic project objectives and also preserve the protected tree before approving

removal of a private protected tree. Director shall find that the tree proposed for removal is neither a mitigation tree nor a tree previously required as part of project approval before approving removal of a private protected tree."

Similar language is required for removal of City Trees either on private property or on public projects.

• The definition for Private Protected Tree needs to be amended to provide the defining threshold measurement in circumference as well as diameter. Current Code requires homeowners and tree workers to measure circumference, and then divide by pi (3.14). Homeowners and tree workers measure circumference. The City should divide by pi and list target circumferences. The prior version of the City Tree Ordinance included the circumference measurements.

• The Code should be amended to require disclosure of a tree's protected status in real estate transactions of property within City limits. Most homeowners don't understand the requirements associated with the Tree Ordinance. When they purchase a home, they may assume that they are not limited by City Code. One way to ensure that residents understand the requirements is to include them in real estate documents.

• The Code should increase the number and percentage of protected trees. Many trees provide substantial canopy benefits but do not meet current code standards of Private Protected Trees. Canopy value needs to be analyzed prior to removal of large trees.

• The City should consider reinstating the Heritage Tree definition to recognize and protect special trees that have historical and social value. The Heritage Tree designation was often a source of pride to the owner—helping to instill a sense of stewardship of a valued part of the City.

• The City should create a searchable accessible register of all Private Protected Trees. If Heritage Trees are reinstated, the City should create a searchable accessible register of all Heritage Trees.

2) Create an Urban Forest Advisory Commission

TFS strongly recommends that there be an Urban Forest Advisory Commission created in City Code. The Code should establish its composition, appointment guidelines, function, and budget, and provide for neighborhood members, as well as, tree expert members. The Commission should be responsible for monitoring UFMP implementation, and UF budget, and make an annual report to Council. The Sacramento Tree Services Best Management Practices Review and Report (November 3, 2003) recommended forming a Citizen Advisory Group similar to this (pp. 34-35). An Advisory Commission is recommended in the UF Best Management Practices for Public Works Managers (p. 13).

3) Tree Services and Enforcement

The current enforcement strategy for work done on trees is based on the public reporting violations to UF. This reporting is, by its nature, done during or after the damage is done to a tree, and is further predicated on neighbors or others being aware of best practices for arborist care. After a tree is topped, it is permanently compromised. Yet topping is frequently done in Sacramento. A topped or dangerously pruned tree has reduced canopy value. The way to prevent it is to prohibit tree work without a license.

City Code should be amended to require tree services businesses to be registered by the City. The Code should require residents and businesses to use registered tree services. The Code should require tree services employees to demonstrate knowledge of City Ordinance, the UFMP, and best practices. This is a common practice in cities. See, for example, City of Folsom and Boulder, CO. There are a variety of state and professional standards for licensure. The City might use proof of that licensure in issuing a license. Folsom provides its residents with a list of licensed tree care companies that meet standards.

The Code should clarify that Best Practices are required for all tree work, not just on City Trees or Private Protected Trees. This would include, for example, no topping without City review and permit.

4) Protection of Trees During Construction

The Code needs to clearly define specific construction protection requirements. This section was removed in the most recent revision of the Tree Ordinance. For example, 6-foot-tall chain link fencing attached to poles set in the ground should be required. Removal of limbs and or trees for temporary construction activities should not be permitted for construction that can affect City Trees and Private Protected Trees. Also, the Code should set forth guidelines to establish appropriate inspections by International Society for Arboriculture (ISA) certified arborist during construction and penalties for noncompliance of tree protection requirements.

5) Timing of Tree Removal

The Code should clarify the requirement that tree removal will take place concurrently with any demolition activities. Tree removal shall not be performed prior to building permit issuance.

6) Pruning for Sign and Building Visibility

Standards for sign and billboard line of sight should be spelled out.

7) Outdoor Seating

Outdoor cafés impinge on City street trees' available growing space and the path of travel becomes a concern. Outdoor café seating needs to be adjusted to allow more space for the tree as it matures instead of removal of the roots or tree. Paving over tree planting space should not be permitted for outdoor seating.

8) Require Reporting by Outside Agencies

Utilities and flood management districts remove trees without any requirement to obtain permits from the City or to report to the City on tree removal. The Code should be amended to require reporting to UF of tree removals by exempt entities.

9) American River Parkway

The City should specifically include the protection of the trees in the City portion of the American River Parkway in its Ordinance.

10) Developer Fees

Developer fees should be adopted by City Council to pay the full cost of UF staff review of development project tree removal permit applications, to review and approve landscape plans, and to track tree removal and replacement for new development.

11) Tree Appeal Process

In order to ensure that tree appeals are adjudicated by trained professionals, all tree appeals should be conducted by a Hearing Officer who has earned a degree related to tree science and is an International Society for Arboriculture (ISA) certified arborist.

References

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Penn State College of Agricultural Sciences, September 12, 2017

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Sacramento, CA 2018, Davey Resource Group

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Sacramento, CA 2018, Davey Resource Group

"The Sacramento Tree Services Best Management Practices Review and Report"
November 3, 2003, Robert L. Tate Associates, Inc.

Some Recommendations for Inclusion in a Best Practices Manual for the Urban Forest Master Plan Update
Trees for Sacramento
March 29, 2019

Pest Management

- Re-instate the elm leaf beetle Integrated Pest Management (IPM) program. Prior to 2007, elm leaf beetle was successfully managed in Sacramento by an IPM program that was developed by UC Berkley Dept. of Entomology under a grant from the CA Dept. of Pesticide Regulation. Dr. Don Dahlsten studied the elm leaf beetle which was causing the defoliation of 70 – 100-foot-tall English & Siberian elms in the middle of summer. Urban Forestry (UF) at that time was trunk injecting all the elms but due to staffing levels treatment wasn't completed at the optimal time. The three year UC Berkeley study tested various elm leaf beetle control methods. The result was a monitoring program which targeted treatments when beetle egg counts reached a certain threshold. This very successful IPM program cut pesticide use by more than 60% and reduced the elm leaf beetle population to record low levels.

- Pink Rot fungus attacks the California fan palm, and if left untreated will eventually kill the palm. Weather plays a critical role in this disease. A program to monitor infected palms and to provide treatment before the palm dies will greatly reduce the number of removals.

- Fusarium wilt of Canary Island date palms is a fatal disease that is spread by the use of chain saws to prune the palm. Best practices recommend the use of hand saws to prune these palms. The hand saws are soaked in a 50% bleach/water solution for at least 5 minutes. Removal of infected palms requires control of the saw dust. Care must be taken not to allow the saw dust settle in the ground.

- Asian woolly hackberry aphid causes excessive drip on vehicles and sidewalks. This pest is controlled by an insecticide applied as a soil drench. UF should partner with UC Davis or UC Berkeley to explore the introduction of predatory insects found in the pest's native country. Tree mitigation funds should be made available to support a study.

- Mature elms near building construction are more prone to becoming infected with Dutch elm disease. Elms adjacent to construction site should be treated with the fungicide Arbortech – 20 S.

Operational Improvements

- UF should oversee the care and maintenance of the all the public park trees in the city. UF should also oversee the parking lot shade trees. UF previously issued pruning/removal permits for parking lot shade trees. UF arborists have the expertise to advise on root pruning and insect/disease issues that prevent needless tree removals.

- The use of decomposed granite or artificial turf should be restricted in tree wells and park strips where city trees are planted. Organic mulch should be used in these areas. Trees planted in a turf area should have a 6 ft. by 6 ft. turf-free area where organic mulch is installed. Downtown tree wells need barriers to prevent pedestrian foot traffic from compacting the soil. Metal tree guards should be used when newly planted trees are vandalized.

- For City trees or mitigation trees, post-planting tree care should include an inspection every year for the first ten years. Trees should be structurally pruned to develop a strong trunk and branch framework to support the tree crown. This reduces the costs of pruning and tree repair work over the life of the tree.

- Tree support systems i.e. cabling/cobra should be considered for use on significant, mature trees which have a structural defect that poses a high risk.

- Prior to 2007, UF would plant trees in the front yard City right of way maintenance easement on residential streets that do not have a park strip. The maintenance easement is a strip of land parallel to a public street which is 6 ½ feet wide measured from the front property line. The property owner would then be responsible for the care and maintenance of this tree. UF staff would also inspect and make recommendations on trees located in the maintenance easement. In order to reach our canopy goals, these services need to be re-instated Sacramento residents. The services were one of those included in the description for the Landscape and Lighting Assessment program.

- All tree services performed in the City should be managed by the chief of the UF section. Currently some UF staff are loaned to other areas, for example Department of Parks (city park tree services), or to the Concrete Section of the Department of Public Works (sidewalks). In order to create the best program coordination, streamline notification, and enhance cross-training, all city staff working on tree issues should be in the UF section, under the management of the UF chief.