



Greg Sandlund, Planning Director
Community Development Department
300 Richards Blvd, 3rd Floor
Sacramento, CA 95811
cap@cityofsacramento.org

Re: Vulnerability Assessment and Climate Action & Adaptation Plan Chapter 7: Adaptation

Mr. Sandlund,

The City of Sacramento released the preliminary public review drafts of the Climate Change Vulnerability assessment and Chapter 7: Adaptation of the Climate Action and Adaptation Plan (CAAP) for public review. The draft represents the City's plan to protect people, assets, productivity and quality of life from the impacts of our changing climate.

The Sacramento Metropolitan Air Quality Management District (Sac Metro Air District) commends the City for undertaking the urgent task of developing a climate adaptation plan, and we are pleased to provide the following comments and suggestions.

General Comments

We commend the City for its comprehensive vulnerability assessment, paying special attention to vulnerable populations. The chapter captures the urgency of the climate emergency and clearly describes our climate future. The companion adaptation chapter, likewise, addresses these vulnerabilities, but we would recommend strengthening some of language to be more prescriptive to ensure the City is prepared. Replacing words such as "encourage, promote, guidelines, and should" with "require, mandate, standards, and shall" will help speed the implementation of these important and necessary actions.

Specific Comments

ER-EC-5-1: Cooling Design Techniques

- Instead of using design guidelines to promote the use of passive cooling, we would recommend using standards to require appropriate techniques for passive cooling. The Capital Region Urban Heat Island Mitigation Project¹ investigates the efficacy of several of these methods when applied at scale.

ER-EC-5-3: Urban Heat Pilot Projects

- While the Sac Metro Air District appreciates the willingness of the City to participate and lead pilot projects, we note that many pilot projects on urban heat have already been conducted in

¹ <https://urbanheat-smaqmd.hub.arcgis.com/>

California and the Sacramento region. We hope that limited resources are focused on creating and implementing design standards to prepare all infrastructure and assets, rather than pilots which, by their nature, are limited in scope.

ER-EC-5-7: Tree Canopy

- We applaud the adoption of a tree canopy goal, and look forward to the development of objective design standards to ensure that individual development projects, as well as public works projects, contribute to this goal.

ER-EC-5-11: Parking Lot Shading

- Beyond monitoring compliance with the ordinance, appropriate remedies must be included to ensure that the urban heat island effect is ameliorated as much as possible when tree plantings fail. Requiring non-compliant parking lots to raise their albedo through pavement treatments until adequate canopy coverage would help protect vulnerable populations while providing incentive for parking lot operators to appropriately maintain their tree canopy.

A-2.1: Heat Reduction in New Development & A-2.4: Resilient Design Techniques

- Our buildings have great opportunity to be resilient, not only protecting their inhabitants, but also bringing co-benefits to the surrounding area. We would encourage the City to make implementation of these actions a priority.

We would like to thank the City of Sacramento for your hard work and dedication in preparing this vulnerability and adaptation plan, for your willingness to listen to stakeholders, and for laying the groundwork for ambitious actions needed to prepare for our climate future. Developing the plan is only the first, and easiest step; next comes all the hard work to realize these commitments. There still remains much to do – not just for the City of Sacramento but for all California communities – and we look forward to working with the City over the next decade to achieve its 2030 climate neutrality target while building climate resilience, protecting public health and the environment, and supporting the local economy and quality of life.

We appreciate your attention to these comments. If you have any questions, please contact me at pphilley@airquality.org.

Sincerely,



Paul Philley, AICP
Program Supervisor, CEQA and Land Use Section
Sac Metro Air District



ECOS

ENVIRONMENTAL
♦ COUNCIL ♦
OF SACRAMENTO

Post Office Box 1526 | Sacramento, CA 95812-1526

December 5, 2022

Mayor and Council Members
City of Sacramento
915 I Street, Sacramento, CA 95814
Sent via email cap@cityofsacramento.org

SUBJECT: City of Sacramento Climate Action Plan (CAAP) Preliminary Draft Adaptation Chapter

Dear Mr. Mayor and Council Members,

Thank you for the opportunity to comment on this chapter.

Flooding: The Draft highlights the high flooding risk in Natomas. Proposed developments in the Natomas basin such as South Airport Industrial, Grand Park, and Upper West Side, would increase flooding threat to Natomas because these lands currently are agricultural, and can absorb significant water should flooding occur. In addition to increasing flooding risk in the Natomas Basin, another climate risk associated with these developments is the loss of habitat land and related species (giant garter snake and Swainson's hawk), which would mean failure of the Natomas Basin Habitat Conservation Plan. Therefore, the City should find a mechanism to influence the County's process of development approvals in these areas. One possibility might be a "Sphere of Influence" application to LAFCo, which has the charge to preserve agricultural land.

Trees: The City of Sacramento has both the Parking Lot Tree Shading Design and Maintenance Guidelines and a tree ordinance. These should be updated to allow for larger shade trees and larger planting areas. We note that Crocker Village has planted "lollypop trees" that don't provide much shade, and trees on Crocker Drive have insufficient planting radius to allow for mature growth. In contrast, neighboring Curtis Park has tree plantings that shade the entire streets by foliage meeting in the middle. The City should develop programs to guide urban forestry within communities, with a focus on increasing canopy in underserved communities. Tree planting should be required as part of major roadway or utility projects. The City should establish a resource database to help staff select tree species based on maintenance costs, structural integrity, and the most appropriate planting locations.

Water: The City should actively participate in the Sacramento Regional Water Bank, to store water during high precipitation years, for use during droughts. This is especially important with models showing more extremes of precipitation, and much earlier Sierra snow-melts. Because the City relies on a combined sewer system for the older parts of the city, the City needs to budget for upsizing pipes in that water system.

Electrification: The City should move forward rapidly on an ordinance requiring existing building electrification, rather than burning natural gas that accentuates the heat island effect.

Land Use: The City should consider land use as an adaptation; e.g., rezoning around transit for higher density, creating community public spaces and parks.

Structures: The City should consider incentivizing green walls and green roofs that cool buildings and provide food in urban settings, as well as shaded bus shelters, including passive-cooled shelters, such as developed by JCDcaux. The City should develop green building programs that require institutional and commercial buildings to

have cool roofs. These strategies can be phased in based on square footage and allow for flexible compliance between cool roofs, green roofs, and rooftop solar PV to help alleviate cost concerns.

Roadways: The City should have code requirements for both new roadways and maintenance activities to ensure that roadways are designed and built at the outset to support heat-resilient paving materials. The City should also require high albedo and permeable pavements for transit stations, centers, and corridors.

Sincerely,

A handwritten signature in black ink that reads "Ralph Propper". The signature is written in a cursive, flowing style.

Ralph Propper
Climate Committee Chair
Environmental Council of Sacramento

cc:

Mayor, Darrell Steinberg, DSteinberg@cityofsacramento.org

Mary Lynne Vellinga, MLVellinga@cityofsacramento.org

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Mindy Cuppy, City Clerk, mcuppy@cityofsacramento.org



Sacramento Climate Coalition and 350 Sacramento Comments on the Vulnerability Assessment and Draft Adaptation Section

December 5, 2022

Climate Change Vulnerability Assessment Review

Primary and Secondary Climate Change Impacts in Sacramento Table

Precipitation - Precipitation section bundles drought and flood even though the impacts and effects and responses are not the same. Table doesn't discuss drought responses.

Wildfire - Wildfire section doesn't mention severity of wind driven grass fires on edge of city. The table says air quality impacts are moderate, but the Paradise Fire in 2018 resulted in business and school closures due to smoke and the region had the worst air quality in the world for at least a week.

Secondary Impacts - Extreme Heat Days

Historical data is capped at 2005 in Heat and Precipitation models. Therefore linear projections should be through the current annual data, separately from the modeled projections shown (two projections resulting) to give a picture of how the modeled data differs from historic data through 2021.

Map 23 - Urban Heat Islands and DACs

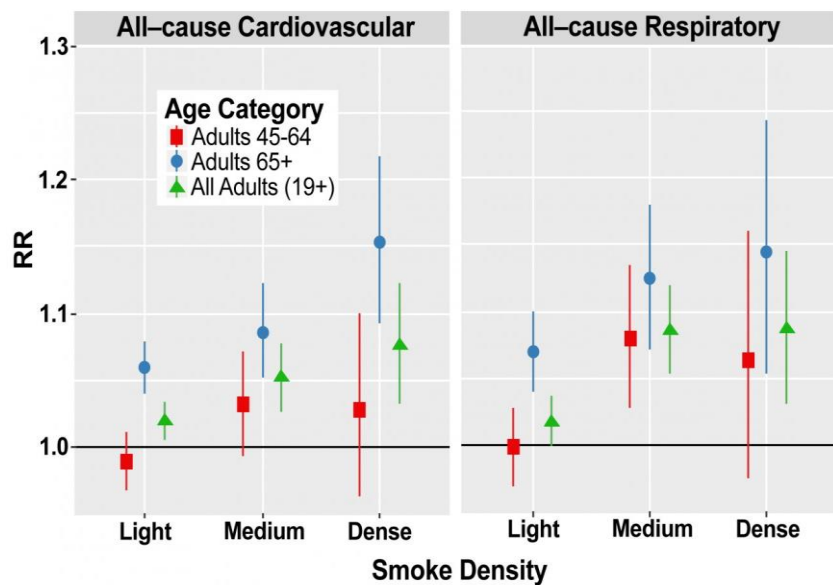
Can the urban heat priority intervention areas be added to this map? In the Vulnerable Populations section (pg. 119), it states that "the City partnered with the NASA Langley Research Center to study the effects of urban development on urban heat islands in the City of Sacramento and the potential for urban interventions to reduce risks, particularly in areas with the greatest vulnerability. Specifically, urban heat priority intervention areas have been identified to target resources where they will be most effective and benefit those who are most at risk". Is the city planning to help low-income residents in those areas get more insulation or heat pumps? Will they get discounted water, or help installing greywater systems to support trees?

Vulnerable Populations - Older Adults (p. 69):

The discussion on air pollution’s effect on vulnerable individuals is incomplete and leaves out multiple other effects and the fact that it can affect average citizens as well as the vulnerable individuals according to the [US EPA data](#).

Wildfire smoke can result in not only the conditions mentioned, but also can lead to premature death, congestive heart failure, stroke, pulmonary inflammation from repeated exposure, bronchitis, and increased vulnerability to infections such as from Covid 19.

The figure below shows relative risk (RR) and 95% confidence intervals for emergency department visits for all cardiovascular and respiratory outcomes relative to smoke free days, at lag 0 days, stratified by age. Source: Adapted from Wettstein et. al. (2018); [US EPA website](#).



Based on this data, we suggest adding information to the Climate Action public information campaign public service ads that:

- Informs people of the risks of wildfire smoke; and
- Encourages people to guide their daily outdoor activities based on checking AQI scores during smoky days.

Adaptation Section Review

This report relies heavily on aspirational language and lacks implementation details, specific deadlines, goal dates and funding sources. It is often unclear what the “actual” actions are that must be done to mitigate climate impacts. The actions rely too much on passive and noncommittal language – *support, continued leadership, promote use of, continue to pursue, should evaluate updating, shall strive to, should work with, consider, encourage, shall evaluate the feasibility of, explore opportunities, plan for*, etc. This language commits the City of Sacramento to implementing little, and even if some of these actions are completed, they will not improve the city’s resilience to climate change impacts based on the absence of goals. For all actions, the City needs to include measures of success or benchmarks. The City of Oakland’s 2030 Equitable Climate Action Plan includes measures of success and the LA Countywide Sustainability Plan includes targets for each action for 2025, 2035 and 2045. Why can’t Sacramento’s plan include these?

We are left with feeling the City’s message is: we would like to do these things and will create plans but do not hold us to a specific timeframe. We know that City officials have said they have a climate plan but no funding (at the last City Council meeting with the Climate Plan presentation). This is a key item missing from this document. Where is the action around finding funds, grants, etc?

Climate experts say that even with a deadline of 2030 we will suffer great changes at the current rate of climate change. What is even more disturbing is your document still includes the goal date of 2045 (per the Mayor’s Climate Commission). We are already suffering from the effects of climate change. Putting off action is deadly for this community, as well as globally. This needs to be a mobilization, like World War II. While we want to encourage and celebrate the city for taking action, we do not see the necessary urgency in the Adaptation document.

MEASURE A-1: Strengthen City government capacity for integrated, holistic climate adaptive strategies.

This measure includes many great ideas, however there are no details, target dates or benchmarks for the implementation actions. For Climate-Informed spending, what steps must be taken to make this happen, when is the target date for implementation? For staffing, what level of staff and in which departments? How will this be paid for?

Actions 1.5 and 1.6 are not even aspirational goals, but just routine, vague statements about “supporting” collaboration and “using and disseminating” resources.

The city should be more specific about evaluating and reducing climate impacts of city expenditures and operation, as the City of Oakland did in their 2030 Equitable Climate Action Plan (CL-1).

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

What is the purpose of pointing to General Plan policies that correlate with this measure? It is unclear what this achieves and is confusing to the reader.

This measure has identified some good actions but lacks any detail on how the city will achieve these goals. Many of the actions rely on aspirational language rather than include measurable goals with target dates, benchmarks and funding sources. The LA Countywide Sustainability Plan has a strategy to “require sustainable, healthy building design and construction” and includes specific, concrete actions (Strategy 2B). The city should adopt similar language. In 2022, the City should not *evaluate updating* (2.1), *encourage* (2.2), and *evaluate the feasibility* (2.4) – the City needs to update, implement, and provide specific assistance.

The city seems to be taking a back seat on some of these actions, when this document needs to outline specific actions the City will take. The City has no authority to make Action 2.2 happen. Can the City identify specific actions they can take to assist SacRT instead?

In terms of the tree canopy (2.9), there needs to be a plan for maintenance of trees in disadvantaged communities who cannot afford the upkeep of these trees. The city should take a lead in maintaining and improving tree canopy health and partnering with specific organizations that are active in this space. I believe there is a need to create a collaborative plan (with the County, Tree Foundation, etc.) to establish a team that is designated to do such maintenance, with specifics, including goal dates. This is also a ripe opportunity for job creation, especially for youth. The city is already struggling to find qualified foresters, this is an opportunity to train young people in a green job field and improve tree canopy health.

Cooling centers (A-2.10) ideally need to be part of resiliency centers. Coordination for “Neighborhood Resilience” (ER-EG-5-12) should also be part of that big plan. It is confusing to have these same topics scattered throughout the document. Cooling centers are brought up five times but at none of these instances does it mention the City needing more/larger cooling centers in the future, or discuss any analysis of how much more capacity might be needed, or what would be done to assess and plan for these.

There is no mention of increasing low-income housing, which is critical to address food scarcity and survival for our disadvantaged communities who will be using these

resilience/cooling centers. There is an urgent need to have a decent place of shelter with all the extreme weather events ahead.

MEASURE A-3: Reduce the risk of damage to life, infrastructure, and property due to flooding and sea level rise.

These implementation actions seem to be a list of existing General Plan policies or actions already found in the 2021 Local Hazard Mitigation Plan. Many of these actions are required by the state. Please specify which actions are already in place, already being implemented, or are required by the State. Please state when these plans will be created and implemented.

Some of the actions listed are not actions, this is confusing to the reviewer. “Continue to meet requirements” (3.3) does not seem like an action appropriate for a CAP. Actions 3.11, 3.12, and 3.14 are statements and updates on existing projects. While these projects are good, it is not clear why they are listed here.

Please add timelines to these actions.

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

This measure should be strengthened and the goal changed to reducing exposure to pollution. The City should adopt the goal in LA’s Countywide Sustainability Plan, to “Minimize the exposure of vulnerable populations to pollution and reduce health disparities” (Strategy 1A).

Please describe these when actions will occur and which actions are already underway.

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

In general, a majority of these measures do not focus on Sacramento’s most vulnerable communities. Prioritizing vulnerable communities should be explicitly stated in each action.

Utilizing CERT volunteers and expanding the CERT program is an excellent idea (5.1). The city should provide targets for expanding the program (number of participants) and should work to offer CERT training in other languages. The LA Countywide Plan identifies targets for the number of people trained on emergency response as well as number of trainings available in other languages (Strategy 1F).

For Action 5.8, the City should consider not just providing support for businesses, but also asking businesses to contribute to the community by “building capacity of retailers to

sustain neighborhoods in the event of an emergency and ensure continued operations during and after a disaster” (LA Strategy 1F, Action 25).

The resiliency portions (5 -20 and 5-21) are welcome in that you are including this development in your plan, but “developing a strategy” sounds like developing a preliminary plan when action needs to be taken now. It is not clear whether “providing resources” is informational only or provision of actual resources to the disadvantaged community. Information is great, but the disadvantaged community needs the resources. Again, what is missing are the specific goals, the dates by which this work will be done and the funding sources.

The City should include a new measure to “Increase resources such as drinking water fountains, filling stations, bathrooms, showers, kitchens, and laundry facilities in parks and public spaces that can be activated to support community resilience during emergencies” (LA Strategy 1F, Action 27).

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

These actions are good, and more information on their rollout/timelines is desired.



December 5, 2022

VIA EMAIL

Attn: Jennifer Venema
City of Sacramento
Office of Climate Action and Sustainability
915 I Street
Sacramento, CA 95814

RE: Sacramento Climate Action and Adaptation Plan (Preliminary Draft Chapter 7: Adaptation)

Dear Jennifer Venema:

Thank you for the opportunity to comment on the Preliminary Draft Chapter 7: Adaptation (Adaptation Chapter) of the Sacramento Climate Action and Adaptation Plan (CAAP).

We appreciate the efforts staff have taken in developing the Adaptation chapter of the plan. The CAAP is a critical step to the City of Sacramento's climate action, considering the multi-fold impacts that climate change will have on the city's residents, particularly frontline communities who will suffer the impacts of climate change first and worst.

Civic Thread is a nonprofit organization dedicated to advancing equitable investment in the built environment. As such, we would like to emphasize the importance of implementing adaptation strategies through an equity lens that prioritizes the needs of vulnerable communities that will be disproportionately impacted by climate disruption. Stated prioritization of historically disinvested communities is included in several places in the Adaptation Chapter, and we encourage the Climate team to ensure that this is done for every strategy in the CAAP. We also recommend the City use stringent language throughout the plan to commit to climate action – e.g., “the City *shall*” rather than “the City will strive to”, particularly for key strategies. We are at a critical juncture, and binding language is important for committing to a path of action. We hope, moving forward, to see the City dedicate funding towards additional sustainability and climate staff, to hasten implementation of this CAAP and ensure that climate mitigation and adaptation

activities have robust support and that implementation is not resting on the shoulders of a few.

We also encourage the City to consider the expansion of a Universal Basic Income program as a resiliency tactic. Particularly for low-income families, providing a base level of income can improve people's ability to prepare, endure, and recover after climate disasters, particularly when facing loss of housing or destruction of property. While this tactic may not seem like a direct adaptation strategy, it has numerous co-benefits and equity impacts and should be considered.

We would like to offer the following specific feedback on sections in the Adaptation Chapter:

Tree Canopy and Urban Heat Island

- ER-EC-5-7: Tree Canopy: We appreciate that prioritization will be given to areas with the lowest tree canopy cover. We would like to see some examples given regarding strategies that will be explored to reduce barriers to tree planting in disadvantaged areas and would like to see stated intent to partner with local tree experts and community groups to increase the prevalence of tree planting and continued tree maintenance in these neighborhoods. We would like to see strategies explored that can increase tree planting for homeowners *and* owners of multi-family housing, and programs that can support workforce development through tree maintenance.
- A-2.5: Urban Forest Plan: We suggest including a sentence that states that an equity lens will be used in the development of the Urban Forest Plan and that equity will be explicitly considered in the prioritization of resources as this plan is implemented.

Extreme Weather

- A-2.11: Extreme Weather Outreach Strategy and A-2.12 Severe Weather Action Plan: While we are pleased to see that the City intends to utilize social media and in-person outreach to the unhoused population, these two strategies for outreach leave out significant portions of the population, such as seniors or low-English proficiency individuals who may have internet but are either not internet-savvy or are isolated due to language barriers. We recommend including additional options for outreach, for example traditional mailers, telephone outreach, or radio,

that can help reach these populations, as well as considering additional populations that might need in-person outreach to have meaningful access to information. We would also like to see greater partnership with community partners who provide shelter during extreme weather events, in particular when determining the thresholds for when to begin cooling/warming center activations. Cooling and warming centers have not been provided for sufficient lengths of time in recent years when there have been extreme weather events, and this has greatly impacted vulnerable members of the community. We do understand that the City operates in a resource-constrained environment and hope that funding sources can be identified so that adequate coverage can be provided in the future.

Air Quality

- A-4.3: Outreach on Effects of Smoke on Air Quality: This section states that outreach will be carried out via social media and network media. We appreciate the addition of radio to the proposed outreach method but recommend going further and considering additional outreach methods such as traditional mailers, local news broadcasts, and disseminating print resources through community-based organizations.
- We are pleased to see that north and south Sacramento have been noted as high priorities for air pollution control initiatives, and that disadvantaged communities more generally are highlighted as needing interventions to improve air quality. Communities with greater air pollution due to historical racist development patterns are more likely to suffer from adverse air quality impacts such as asthma. Equity-based action to rectify these health disparities is crucial.

Thank you for the opportunity to provide comments, and for City's staff diligent work on the Draft Sacramento Climate Action and Adaptation Plan. Civic Thread looks forward to continuing to follow this planning effort. Should you have any questions, please don't hesitate to reach out to me at [REDACTED].

Sincerely,



Kathryn Canepa
Project Manager, Civic Thread

A Review of Chapter 7 of the Climate Action and Adaptation Plan

December 5, 2022

To: The City of Sacramento Climate Action and Sustainability Office

Dear Jennifer Venema and Laila Atalla of the Climate Action and Sustainability Office,

We would like to begin a conversation between this office and the neighborhoods of Sacramento regarding the preliminary draft of Chapter 7 of Climate Action and Adaptability Plan (CAAP). The following Ch. 7 review highlights some of our concerns we would like to address with this office before the next draft of Chapter 7 of the CAAP is released.

The six neighborhood leaders who collaborated to create this review are:

- (1) Barbara Falcon of Deerfield Mesa Grande in D8 – reviewer
- (2) Kirk Vyverberg of Land Park in D4 – reviewer
- (3) Jeff Coleman of Land Park in D4 – reviewer
- (4) Francesca Reitano of Elmhurst in D6 – reviewer
- (5) Bruce Pierini of Curtis Park in D5 – letter editor
- (6) Jennifer Holden of Mangan Park in D5 – letter editor

Please respond to this review by contacting:

Bruce Pierini at: [REDACTED]; and
Jennifer Holden at: [REDACTED].

Sincerely,

Meadowview Neighborhood Association – District 8

Land Park Community Association – District 4

Sierra Curtis Neighborhood Association – District 5

Deerfield Mesa Grande Neighborhood Association – District 8

Mangan Park Neighborhood Association – District 5

Noralto-Neighbors United – District 2

A Review of Chapter 7 of the Climate Action and Adaptation Plan

An Adaptation Plan is a combination of prevention and response actions that should always emphasize the first strategy. Priority should go to:

- (7) the replacement of combined sewer and storm water systems preventing known health hazards;
- (8) heat reduction requirements in both public and private development standards;
- (3) the integration of a vigorous Urban Forest Management Plan into an ordinance;
- (4) the development of a Water Supply Management Element into the General Plan Update providing proof of water supply for present and future housing with sustainable growth goals; &
- (5) community engagement with City plans and programs led by council district liasons.

Water Use/ Storm Water/ Sewers

A-6.6 on page 51: Continue to collaborate with regional water agencies, local partners, and public support for groundwater bank programs after sufficient public review of cost, tax impacts, infrastructure requirements and cost/benefits analysis. Comparative conditions of slow growth alternatives should also be provided to public review for consideration.

Heat Effect/Tree Canopy

Adaptation > Goals, Policies and Actions on pages 20-26: contains details regarding tree planting, and little to none on protecting our existing tree canopy, especially in residential neighborhoods. Please include the goals, policies, and actions that will protect our existing tree canopy.

Measure A-2 on page 20: This draft proposes increasing urban tree canopy cover but does not propose preserving existing tree canopy to avoid heat island effects. Suggest including language that supports protecting the existing tree canopy under the heading of 'Create built environments that reduce exposure to extreme heat and mitigate urban heat island effect'.

ER-EC-5-8 on page 23: This merely talks about “encouraging ... private development projects to consider alternatives to removals of healthy trees whenever feasible ...”. First, we are not sure what is encompassed by the term “private development projects.” Does it include small projects such as ADUs, duplexes, triplexes and fourplexes in R-1 zoned areas in existing residential neighborhoods? Secondly, providing “encouragement” is insufficient; we need strong ordinances to protect existing trees.

A-2.5 on page 25: The Urban Forest Master Plan incorporates a vague hint of the concepts expressed above concerning tree protection as part of the Urban Forest Plan (UFMP). The problem is that the UFMP is the *last* element of General Plan 2040, which means that the scope of the UFMP will be severely limited by everything that has been conceptualized, planned and approved *before it*, for example the Missing Middle Housing portion of the 2040 General Plan.

A-2.9 on page 26: Tree Canopy Health needs to include maintenance and assistance as a matter of economic and environmental justice in low-income neighborhoods, especially those without park strips.

A Review of Chapter 7 of the Climate Action and Adaptation Plan

Emergency Preparedness

In the A-5's on pages 39 - 48: Please include in this section that the City shall create options for ensuring emergency power at critical and community facilities, such as resilience hubs, including micro-grids, solar capture and storage, distributed energy, and backup generators. The City needs to complete plans for robust and thorough efforts of energy backup by December 2023.

A – 2.11 on page 27; A- 5.13 on page 45: There should also be additional attempts to encourage people to sign up for Everbridge, Sacramento Alert, FEMA, Flood Watch Newsletter, and other emergency services hotlines, and there should be multiple locations identified as possible centers of refuge.

Air Quality

Overall Air Quality Risk + Adaptation Approaches on pages 36-38: The City and its partners have a responsibility not just to prevent catastrophe, but to ensure quality of life regarding air quality. Sacramento must continue to attract and retain the families, businesses, and cultural assets that make it the vibrant, diverse city it is today. The City should expand its adaptation approach to include investments in community outreach and engagement regarding the decline in quality-of-life issues residents are already experiencing due to climate change (e.g. "half of my kids soccer practices were cancelled due to poor air quality.") Sacramento must become a model for cities aiming to thrive, not just survive, in the warmer future.

The City shall also increase access to publicly accessible indoor spaces with good air filtration. These spaces would be like "cooling centers" but with the goal of improving quality of life during hazardous air quality events. For example, Oakland provides funding to several museums which offer free admission on bad air days. There are other northern California examples as well.

A-4.1 on page 38: The City shall take immediate actions detailed in this plan to address air quality impacts -- one of the biggest impacts we already face -- and build greater public support for investments in adaptation.

A-4.2 on page 38: In addition to its own social and network media efforts, the city must prioritize and invest in building partnerships with community-based organizations such as schools, churches, and other trusted voices. These partnerships would promote the use of city resources by residents (e.g. to subscribe to air quality text notifications) and disseminate urgent information more rapidly and broadly throughout the community.)

Land Use

ER-EC 5-8 on page 43; A-2-6 on page 25: – Amend planning and development codes to maintain 50% lot coverage elements in residential zoning in order to prioritize and protect shade tree cultivation.



Citizens' Climate Lobby
Sacramento-Roseville

December 3, 2022

Jennifer Venema, Climate Action Lead
Office of Climate Action & Sustainability
City of Sacramento
Sacramento City Hall
915 I Street
Sacramento, CA 95814

Re: Preliminary Draft Climate Action & Adaptation Plan Chapter 7

Dear Ms. Venema:

Earlier this year, we submitted comments regarding Chapters 1-6 of the City's Preliminary Draft of the Climate Action & Adaptation Plan. Recently Chapter 7 was made available for comment as well. Thank you for the opportunity to submit additional comments, they are submitted on behalf of the Citizens' Climate Lobby, Sacramento Chapter.

The purpose of Chapter 7 is to “**present the goals and policies that the City and its partners will implement to adapt to climate change impacts and improve resiliency.**” Further “**The Adaptation Strategy is intended to address Sacramento’s key climate vulnerabilities identified in the Climate Change Vulnerability Assessment” (17).** In reviewing Chapter 7, we looked to determine whether the proposed measures and actions fulfilled this intention.

While Appendix G details the broad range of climate disasters we are potentially facing, we are deeply concerned that no true plan of action is provided by Chapter 7. The “Actions” fail to meet the stated goals of the Measures outlined in the Chapter.

- I. Most actions read as general intention to develop a plan of action. This largely includes studying issues, “considering” the climate in the development of plans and standards and improving on current practices. Characterizing general intentions as “actions” reflects a troubling lack of urgency and commitment.**

This language shows up in several “Actions”, such as:

1. **“Evaluate and prioritize** climate vulnerabilities in City facilities....” (A-1.4, 19).
2. **“...Evaluate** the feasibility of updating design guidelines....to **promote**...techniques that provide passive cooling and reduce energy demand.” (A-2.4, 25)
3. **“Evaluate** additional diversification of surface water supply to shift supplies to the Sacramento...” (A-6.7, 51).

This language is especially concerning because we must act now on climate change. Additionally, there is no valuation of how things will be prioritized, or what actions will be taken once those priorities are identified.

II. The actions lack specificity and cannot be measured/monitored as written. Further extensive and complex projects are sometimes characterized as a single action item with no detail provided. This does not constitute a plan.

The City does not identify what specific resources are needed to achieve the climate goals set out in the chapter. On page 19, the CAAP proposes to “Dedicate City Staff and resources for long-term climate adaptation and resiliency needs.” (A-1.2) but does not specify how many staff are needed to achieve them, nor what their general scope of work encompasses. Similarly, A-3.10 does not include any measures or specifics that the Development Services Task Force will discuss adopting (32) and states the “City shall develop and implement an urban forestry plan....” (A-2.6, 25) while, once again, omitting actions or setting measurable goals.

While A-3.14 provides more detail, observing that “Many potential drainage projects that have been identified in the City’s Drainage Master plan and have been prioritized on a Basin Master Planning and Improvement Projects priority list”, there is no information about what the plans are or how they will be prioritized (33).

Most concerning is the vague language used around several action items.

1. A-6.5 “Modify Water Treatment Technologies – **to adapt to changing source water quality conditions**” (50).
2. A-1.1: **“Consider climate risks and vulnerability** in City Budget decisions...” (19)
3. A-2.8: **“Update Street Standards** to optimize tree canopy” (26).

None of these examples stresses the importance of making these changes. Nor do they provide a clear road map for addressing the problems. How will we adapt to changing source water quality? What risk considerations should be accounted for in City Budget decisions and what happens once they are identified? How do we measure and achieve an optimized tree canopy? The city does not clearly define how it will identify, plan, or adapt the actions set forth in this chapter.

III. Timelines provided for the goals set out in this chapter are 18 to 23 years in the future. Action is needed immediately.

The Sacramento City Council established a commitment to reaching carbon neutrality by 2045 and seeks to implement as many carbon reductions as possible by 2030 (2019-0465). We believe the City must set and meet ambitious targets, in accordance with the CAAP Draft which establishes the urgency for action because the climate crisis is happening now, not in 18 or 23 years’ time.

Several actions outlined in this chapter either do not state a completion date and are expected to be completed by 2040 or 2045. We understand the climate future of Sacramento includes uncertainty, and the broad goal is to develop resiliency based on the projects. However, actions must also address the current and shortly anticipated impacts of climate change. After the several heat waves Sacramento has suffered over the past decade, we need the Urban Tree Forest expanded and Urban Island Heat Reduction goals implemented immediately.

Additionally, this plan does not establish timelines to measure the impact of these actions in increasing the City's climate resiliency.

IV. The sources of funding are largely unidentified.

Funding is not clearly established for any of the proposed actions. If we do not have funding resources committed to these actions, we will not be able to achieve them.

V. Responsibility for executing on actions has largely been ascribed to "lead" agencies without identifying specific groups, committees, or individuals. (e.g. Public Works, Community Development, and Department of Community Response, etc.). Diffused responsibility results in a lack of accountability.

For example, the responsibility of A-2.2 is not with the City, and there are no timelines, no specific allocation of resources, and no measurable outcomes. "The City shall encourage Sacramento Regional Transit District to study the feasibility of designing and installing bus shelters that are designed to offer protection and relief from heat..." (24). How will the City execute this action? What will the City's role be? The plan as written does not reflect the urgent nature of the climate crisis and the certainty of increasingly negative impacts to our living environment.

VI. The proposed actions do not adequately address the city's Climate Equity Goals. They fall short of a commitment to timely and effective action in our lower income neighborhoods.

The importance of the Urban Forest has been a topic of discussion, study, and planning since the late 1970s. Codes were updated in 2016. A-2.5 states that the "City shall develop and implement an Urban Forest Plan..." (25). We need urgent action, and **the stated actions must include immediate planting of trees in lower income neighborhoods**. Sacramento has suffered from several record breaking heatwaves over the past decade, and there is no justification for further delay. A-2.13 notes that vulnerable populations will need "...increase[d] access to home air conditioning ..." (27). By creating a comprehensive Urban Forest Plan, we can reduce the need/reliance on home air conditioning. Both plans provide no timeline, defined steps, or accountability.

The city can't rely on developing "...informational materials to provide to residents and businesses..." (A-2.9, 26). Renters and lower income neighborhoods are unlikely to benefit from informational materials. Tree planting and tree maintenance require both significant resources and decision-making authority. The city must assume responsibility and act.

The PD places the City of Sacramento in a supporting role rather than the leading role it must assume to reach its goals. There are few clear goals and Key Performance Indicators to measure the success of these actions.

Unfortunately, several stated goals do not consider that Climate Change is happening now, not in 2045. To make a substantial impact on the Climate Emergency and ensure that Sacramento is still habitable by the current population in 2045, the City needs goals that establish action **now**. The City must clearly commit the funds and personnel to achieve these goals and demonstrate climate leadership for other local governments to follow. We must act urgently. The City must lead the way.

Sincerely,

/s/

Elizabeth Barrett
Member, Citizens' Climate Lobby, Sacramento Chapter

/s/

Kay Crumb
Member, Citizens' Climate Lobby, Sacramento Chapter

/s/

Edith Thacher
Lead, Citizens' Climate Lobby, Sacramento Chapter

04 December 2022

Greg Sandlund, Planning Director
Remi Mendoza, General Plan Lead
City of Sacramento
Planning Development Department

Cc: CAP@cityofsacramento.org

Climate Risk & Adaptation Plan (CAAP Ch#7) - Land Park Community Association Review

INTRODUCTION

This community review is part of a series providing community input to the 2040 General Plan update. To date, our review of the Preliminary CAAP Draft was well acknowledged in the recent Reply to Public Comments. Better yet, we find the draft of the Climate Risk & Adaptation Plan to provide a step ahead, incorporating many of our comments and concerns stated through our series of review of the various GPU elements. Because of this emerging sense of discussion between the City planners and the public, we look forward to the day that we may support the master EIR and CEQA certification of the 2040 General Plan.

NOTE: We see that the goals and specific actions refer to major documents including the 2040 General Plan Update (GPU) and a variety of hazard and emergency response plans referenced by separate numbering systems. Where possible, we refer to those specific references by number. Our goal at this point is a high level review focusing on omissions, priorities, and accountability.

SUMMARY

The **Risk Analysis** is comprehensive for first hand effects of Climate Change to the City, yet omits a significant secondary impact of a predictable growth of Climate Refugees from rural communities to the security of resilient well-planned cities. Sacramento's homeless community could represent the early refugees from health and housing insecurities that will be supplanted by refugees from food, water, energy and economic insecurities due to heat waves, flood, fire, and drought. Our efforts to solve the current Homeless Crisis should prove as practice for the coming conditions.

Our **Adaptation Plan** is a combination of prevention and response actions that should always emphasize the the first strategy. Priority should go to (1) the replacements of combined sewer and stormwater systems preventing known health hazards; (2) heat reduction requirements in both public and private development standards; (3) the integration of a vigorous Urban Forest Management Plan into ordinance; (4) the develop of a Water Supply & Management Element into the General Plan Update providing proof of supply for Housing Elements and sustainable growth goals; and, (5) community engagement with City plans and programs lead by Council District liaisons from the office of our local representatives.

Adaptation approaches: The plans outline a long list of direct impacts and acute risks, as well as some of the indirect impacts of climate change on the city, but fail to adequately consider and mitigate the substantial risks posed by a sustained, "sub-acute" decline of quality of life in the city. The City should expand its adaptation approach to include investments in community outreach and engagement around

addressing the quality-of-life issues to become a model for cities **aiming to thrive, not just survive, in the warmer future.**

Many cities are **adapting to poor air quality** by increasing access to public and/or publicly accessible indoor spaces with good air filtration, similar to “cooling centers” but with the goal of improving quality of life during hazardous air quality months, not just preventing severe health impacts. For example, (1) Oakland provides funding to several museums to offer free admission; (2) Fairfax keeps a large city-owned gymnasium open as an “indoor park”; (3) in Europe, urban public transit provides direct access to mountain or seaside recreation.

Wildfire smoke is one of the most tangible, recognizable climate impacts Sacramento residents are currently facing. Yet, the city is only committing to “explore opportunities” to **improve indoor air filtration** - a missed opportunity to demonstrate the city’s willingness and ability to take action to adapt. Compared to the high costs and long project timelines associated with protecting the region from longer-term threats like catastrophic flooding, providing safe air to breathe in places like schools and nursing homes is a relatively easy “win”.

DETAILED COMMENTS & CLARIFICATIONS

Public Spaces & Walkable Main Streets (CD,PW)

ER-EC 5-6 Heat Reducing Public Amenities:

5.10 Watering & Irrigation - prioritize tree planting and health in public right-of-ways.

A-2.1 Heat Reduction in New development – provide setback and building form variability to provide multiple shading layers on sidewalks

A-2.8 Update Street Standards to optimize tree canopy and encourage urban streetscaping and micro-parks.

Land Use

ER-EC 5-8 & A-2-6 Tree Protection – amend planing and development codes maintaining 50% lot coverage elements in Residential zoning, prioritizing and protecting shade tree cultivation.

Public Health

A-4 & A-5 Air& Water Quality Challenges – develop active City / County cooperation to cultivate an effective and resilient Public Health System.

PFS 2.9 Neighborhood Preparedness – develop District Community Liaisons that link neighborhoods to major City plans, programs and personnel through the Council member’s office.

Disaster Preparedness

A-5.7 Disaster Housing / Climate Refugee Sheltering – develop collaborative plan to shelter increased homeless refugees over time, utilizing best practices from global aid groups and developed nations.

(City, County, State) Rural climate refugees will seek the protection of well-resourced urban cities seeking housing, health, food, water and economic security lost to heat waves, floods, fires, and rural groundwater depletion and salt water intrusion.

A-5.8 Disaster Resistant Business Program – prioritized toward healthcare, banks, telecom, utilities, and grocers.

Water Resilience

A-6 / ER-EC 9.9 On-site Water Reuse should be developed by mandate in City Planning ordinance.

PFS 4.5 Comprehensive Water Supply Planning – Should be updated on the 5 year cycle of the General Plan Updates providing reliable long-term water supply that supports commercial and RHNA housing development objectives, while maintaining 20 year standards of livability for existing communities.

A 6.4 & A 6.8 City Groundwater Well Replacement – as recommended in the current City Groundwater Master Plan, replace 38 extraction wells in order to reliably meet the City’s long-term water supply needs as determined by the unrestricted growth of our 2040 Housing Plan.

A6.6 Support Regional Groundwater Banking programs – after sufficient public review of cost, tax impacts, infrastructure requirements and cost/benefits analysis. Comparative conditions of slow growth alternatives should be provided for consideration

A 6.7 Diversify City Water Supply – as planned to include the Sacramento River – recognizing City growth beyond beyond the limits of the American River water supply.

REFERENCE ATTACHED

Kirk Vyverberg, Land Use Chair
Land Park Community Association

Jeff Coleman, Climate Lead




REFERENCE

Q: Can we proceed with a Climate Action and Adaptation Plan that is based on the premise that Sacramento can continue with unabated growth without decreasing quality of life?

The U.S. Drought Monitor from both the USDA & NOAA projects continued Extreme Drought (D3) in the Sacramento Valley and Exceptional Drought (D4) in the San Joaquin Valley with the following ecological impacts:

(Sacramento Valley D3)

- Water is inadequate for agriculture, wildlife, and urban* 
- Federal water contracts are not met – groundwater use increases.*
- Homeowners & farms must drill new wells.*
- Reservoirs are extremely low.*
- Hydropower is restricted.*
- Water use restriction are implemented.*
- Water sanitation concerns increase.*
- Water thefts occurs.*

(San Joaquin Valley D4)

- Surface water is depleted.*
- Federal and State Water contracts are not met.*
- Junior water rights are curtailed.*
- Greenhouse gases increase as hydropower production decreases.*
- Deeper wells are required.*
- Water quality is poor.*
- Water prices are extremely high.*
- Food, dairy, and cattle production collapses*
- Food aid is needed.*

December 4, 2022

**Sacramento Climate Action and Adaptation Plan
Public Comment on 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 upzoning. 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 justice, clustering of projects will leave no place to plant trees and improve air quality, ensuring existing urban heat islands.

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.

Detailed Comments

Pages 20-26 of the Adaptation > Goals, Policies and Actions, contain detail regarding tree planting, and little to none on protecting our existing tree canopy, especially in residential neighborhoods.

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

Page 20, discussing Measure CS-1. On this page the city's draft discuss urban heat island effects as a significant factor, saying we need to increase urban tree canopy cover, without discussing protection of our existing tree canopy. Urban heat islands will be

created by removing existing urban tree canopy cover, which is counterproductive. Suggest including language here that supports protecting the existing tree canopy under the heading “Create built environments that reduce exposure to extreme heat and mitigate urban heat island effect.”

ER-EC-5-8: Tree Protection, page 23 merely talks about “encouraging ... private development projects to consider alternatives to removals of healthy trees whenever feasible ...” First, we are not sure what is encompassed by the term “private development projects.” Does it include small projects such as ADUs, duplexes, triplexes and fourplexes in R-1 zoned areas in existing residential neighborhoods? Second “encouragement” is not enough; we need strong ordinances to protect existing trees.

A-2.5: Urban Forest Master Plan, page 25 incorporates a vague hint of the concepts expressed above concerning tree protection as part of the Urban Forest Plan (UFMP). The problem is that the UFMP is the *last* element of General Plan 2040, which means that the scope of the UFMP will be severely limited by everything that has been conceptualized, planned and approved *before it*, for example the Missing Middle Housing portion of General Plan 2040.

A-2-6: Minimum Tree Planting Standards, page 25 incorporates necessary concepts, as minimum tree planting standards are proposed to be included in the planning and development code.

A-2.9: Tree Canopy Health, on page 26 needs to include maintenance assistance as a matter of economic and environmental justice in low income neighborhoods, especially those without park strips (the public right of way between sidewalks and the street).

Respectfully submitted,

Francesca Reitano
Elmhurst Neighborhood
Sacramento, CA 95817-1633

From: [Muriel Strand](#)
To: [Climate Action Plan](#)
Subject: comments on the Draft CAAP
Date: Monday, December 5, 2022 3:03:51 PM

Dear city staff,

Having read/scanned the Preliminary Draft of the Adaptation Chapter of the CAAP
<https://www.cityofsacramento.org/-/media/Corporate/Files/CDD/Planning/Major-Projects/Preliminary-Draft-CAAP-Chapter-7---Adaptation.pdf?la=en>

as well as the Preliminary Draft of Appendix G, the Vulnerability Assessment
<https://www.cityofsacramento.org/-/media/Corporate/Files/CDD/Planning/Major-Projects/Appendix-G---Preliminary-Draft-Vulnerability-Assessment.pdf?la=en>

It appears that these documents focus on addressing and reducing the impacts of business as usual. As with these plans in general (local and state) the idea seems to be to graft our fossil fuel lifestyles onto PVs, windmills, and batteries. Unfortunately, these nonrenewable harvesters and storage units for renewable energy require fossil fuels for the mining and refining of the metals and minerals needed for their manufacture.

Instead, we would be better advised to plan to re-place our whole society on a foundation of just biological resources. That would be the most direct and cost- effective way to permanently reduce GHG emissions.

The websites below go into more detail about some of the concepts and considerations involved with transitioning to a biological model.

One specific detail; it appears that CA's Title 24 regulations fail to give proper credit to passive solar design and construction. This oversight leaves substantial potential energy savings unrealized.

Muriel Strand, P.E.

<https://cas5-0-urlprotect.trendmicro.com:443/wis/clicktime/v1/query?url=www.bio%2dparadigm.blogspot.com&umid=f0afb55a-ff6d-4502-bb12-f76980eed81a&auth=0c78d5381d8efeba9ba4477b3ca23a49d0ab462f-71f541100163a66174a3fe3dc855812d93b1094f>
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<https://cas5-0-urlprotect.trendmicro.com:443/wis/clicktime/v1/query?url=https%3a%2f%2fwww.researchgate.net%2fprofile%2fMuriel%2dStrand%2fpublications&umid=f0afb55a-ff6d-4502-bb12-f76980eed81a&auth=0c78d5381d8efeba9ba4477b3ca23a49d0ab462f-25a7af063dd66db94eca566ed2f825dfd05ff458>

From: [Maggie Coulter](#)
To: [Climate Action Plan](#)
Cc: [Howard Chan](#); [Amy Williams](#); [Hector Barron](#); [Mayor Steinberg](#); [Angelique Ashby](#); [Sean Loloee](#); [Jeff S. Harris](#); [Katie Valenzuela \(City\)](#); [Jay Schenirer](#); [Eric Guerra](#); [Rick Jennings](#); [District8](#)
Subject: Public Comment - Climate Action and Adaptation Plan, Chapter 7: Adaptation
Date: Monday, December 5, 2022 3:48:31 PM

Protection and expansion of Sacramento's tree canopy must be the highest priority for the CAAP. This means keeping as many big trees for as long as possible, including not cutting down ANY large healthy trees.

The city must complete and release the draft Urban Forest Master Plan as soon as possible, by January 2023 at the very latest. The city has been dragging its feet on this vital plan.

Sacramento must also ban two stroke engines (mowers, gas blowers, etc.) because they are so polluting in terms of both air and noise.

Maggie Coulter
Sacramento 95817